



COGGESHALL PARISH COUNCIL

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RESPONSE FROM COGGESHALL PARISH COUNCIL

Application;-ESS/24/17/BTE/SPO Screening Opinion Request CC/ESS

Address;- Land at Rivenhall Airfield, Coggeshall Road (A120), Braintree CO5 9DF

Title;- Integrated Waste Management Facility – Proposed change of stack height from 85m AOD (35m above existing ground levels) to 105m AOD (55m above existing ground levels)

Please find the following comments from CPC with regard to the above scoping request; -

We believe that the application must be treated as a 'material change' under the Town and Country Planning (Environmental Impact Assessment) Regulations 2011, amended 2015 in force April 6 2016 as the plant is referred to DIRECTLY as a waste incinerator as confirmed in Para 9 schedule 1 and therefore represents a 'Developmental Change'.

Furthermore it is clear that this is a 'multistage application' and as such 'effects not identified at the time of the original principle decision' and 'Schedule 4 part 1' determines that the effects of the changes on planned, new and subsequent developments must now be included within the planning application i.e. their cumulative impact must now be included within any application.

Below is an outline of points that need to be taken into consideration for this scoping request. We accept that some of these points may be considered a part of the second permit application currently being reviewed by the EA, however, the permit application and any future planning application are directly linked and should not be separated in their consideration.

Consequently, and based on the above, the following must now be addressed/included in any application.

1. Provide clarity with regards to the stack height, its relationship with the building and Ordnance datum as this is unclear and contradicted in the documents provided to both ECC and the EA
2. Ensure the stack height is determined by best performance and minimal emissions rather than planning acceptability and cost. Reduction in emissions should be the only reason behind seeking a certain height, and reducing emissions to the lowest point possible should be the goal
3. In the EA refusal document, the EA stated: "**stack heights of (incineration) plants of similar size are in the region of between 70 and 120 metres which we regard as the BAT range for plants in the UK, the proposed stack height (35m) is significantly less than the minimum height that we would consider to represent BAT for a plant of this size.**" Given this, the proposed height of 55m is well below the 70-120m range which the EA recommends.
4. Use a 10km radius for all visual and environmental impact assessments and considerations, and ensure these include proposed developments or allocated sites for development. Ensure that this includes local schools such as St Peter's primary and

Honywood in Coggeshall as the dispersion will occur over a wider area due the increased height. Both of these schools should be included within the consultation process as new consultees under the above legislation.

5. Increase the zones of visual interest beyond 3km to account for the realistic distance the increased stack will be visible over given the nature of the Essex countryside - the distance should be around 10km

6. Additionally, the zone of theoretical view must now include all of the surrounding heritage assets based on the revised stack height; - Ideally this would be best achieved by overlaying the theoretical zone of view onto a heritage map of the area and include near (woodhouse farm) and distant views from Coggeshall (east) Witham, Braintree, Kelvedon and even Chelmsford

7. An illumination/visual impact study should accommodate night time and take into consideration a naturally dark landscape

8. A more compressive photomontage should be provided, based on the above

9. Provide better height, perspective and proportionality examples as comparison with pylons and trees is simply misleading (perspective and proportions are wrong) and should be disregarded. These must be replaced and as there are no comparable structures the statement that '**the stack does not have a significant impact**' is incorrect and misleading. This is especially important given the removal of a significant number of large trees to make way for the development

10. There should be a completely new Air Quality assessment based on the stack height design combined with the changes in plant for BAT (which is not addressed in the scoping request), the revised design, application stack height and technology used

11. A new and not revised EIA is required, based on the above. This must be a totally new EIA based on the revised design, stack height as confirmed and applied for, and to accommodate the BAT/technology used

12. The development of consolidated relevant emergency plans is required

13. An additional wildlife study should be carried out based on the increased stack height

14. Clarification is needed with respect to the process used (open or closed loop) for the water consumption and discharge into the Blackwater. Whilst the scoping document makes passing reference to discharge, the EA has confirmed (at the recent public consultation) that the applicant has had discussion regarding a discharge licence.

These points and inclusions are critical as the above plant had its environmental permit refused by the Environment Agency in December 2016.

An application for a 55m stack would be contrary to condition 14 and the scoping request does not address this matter and, if a planning application is submitted, it should be supported by a clear, fresh and objective EIA that must be a standalone document as above.

Gent Fairhead has stated that they 'have considered the local community' in their statement regarding a new EA permit. There is no evidence of this at all and they have in fact ignored the local community who does not want this.

Furthermore, there has been no communication with the local community and the nature of their documents means they are difficult to access and understand. This is unfair to the community and as a result, there should be a referral to an inspector to assess the situation and there should be a completely new planning application submitted.

12th April 2017