

# RESPONSE TO PLANNING APPLICATION FOR AN ENERGY FROM WASTE FACILITY AT JAVELIN PARK

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**12/0008/STMAJW** | *Proposed development of an Energy from Waste (EfW) facility for the combustion of non-hazardous waste and the generation of energy, comprising the main EfW facility, a Bottom Ash processing facility and Education/Visitor Centre, together with Associated/Ancillary Infrastructure including Access Roads, Weighbridges, Fencing/Gates, Lighting, Emissions Stack, Surface Water Drainage Basins and Landscaping. | Land At Javelin Park Bath Road Haresfield Stonehouse Gloucestershire*

I would like to register my **objection** to the above Planning Application. The key reasons are as follows:

- 1. The Landscape and Visual Impact is unacceptable, particularly from the AONB.** The incinerator would be a very large industrial building, covering 13,040 square metres - nearly twice the land area of Gloucester Cathedral – and rising to a height of 70metres – taller than Gloucester Cathedral. The proposed design, including the size and layout of the building and the materials proposed, are totally out of keeping with the character of this rural area. It will be highly visible from the adjoining Area of Outstanding Natural Beauty (1 mile away) and the Cotswold Escarpment and Cotswold Way, damaging the beautiful views. Appendix 10.13 of the Planning Application states that *‘Vale landscapes prominent in views from upland areas with wide vantage points such as the Escarpment and Escarpment Outliers landscape types are particularly sensitive to the effects of large scale built development’*. Gloucestershire County Council’s draft Waste Core Strategy states that *‘the site is located in an area that is relatively low and flat, therefore any facility would be clearly visible from the Cotswold AONB, the M5 and the surrounding low-lying areas’*. Stroud District Council, in recognition of the sensitivity of this site, has imposed a planning height restriction of 15.7m. This application would flout that restriction, and the democratic process by which it was set. The proposed development is over-bearing, out-of-scale and out of character in terms of its appearance compared with the existing rural nature of the area and would cause demonstrable harm.
- 2. Adverse effect on the residential amenity of neighbours.** The loss of existing views from properties close-by (there are 40 residential properties within 1km), and the increased traffic, noise and occasional smells (for instance when the incinerator is shut down for maintenance and the waste builds up) would adversely affect the residential amenity of near-by owners. The factory plant for waste burning, bottom-ash processing and electricity-generating will operate 24/7. Deliveries of 190,000 tonnes per annum (tpa) of waste, and the export of around 45,000 tpa of bottom ash and nearly 9,000 tpa of polluted Air Pollution Control residues will take place 7-days a week between 7am-7pm – nearly one HGV per minute at peak times.
- 3. I am worried about the health impact.** Incinerators emit a variety of toxic substances, such as dioxins, heavy metals and fine particulates, which will increase the levels of toxic substances present in the environment and have well documented negative health impacts. For example, dioxins are known carcinogens, and can also give rise to a range of other health impacts. Although promoters of incineration point to studies that claim incinerators do not pose a health hazard, it remains the case that the UK Health Protection Agency has commissioned a new study into “birth outcomes” around incinerators in the wake of research showing increased child deaths near incinerators, and in response to demands to reassess its current advice that incinerators are “not a significant risk to public health”.

The Human Health Risk Assessment in Appendix 14.1 of the Planning Application shows that the cadmium exposure predictions for local children is above the health threshold. The fear of negative health impact will itself have an impact on the health and well-being of residents in the area. There are 20,447 children attending educational settings within 5 miles of the proposed incinerator, whose health may be at risk.

4. **There will be a negative environmental impact on nearby protected sites.** This site is about 7km from the Cotswold Beechwoods Special Area of Conservation. As Natural England states: *'The Cotswolds are nationally important for their rare limestone grassland habitat and for ancient beechwoods with rich flora.'* Polluting emissions from an incinerator can contribute to acid rain and cause damage to trees and plants. The Habitat Regulations Assessment commissioned by Gloucestershire County Council (GCC) in 2010 from ERM shows that *'potential significant effects on European sites cannot be ruled out'* for Javelin Park for thermal waste facilities over 100,000 tonnes per annum (see table 6.1, page 39). This proposed facility will deal with 190,000 tpa. The effect needs to be considered together with the 32k tpa thermal facility, already granted planning permission, at the Moreton Valence site (only 600 metres from Javelin Park) making a combined throughput of 222,000 tpa. This is well above the level already considered as potentially significant. The Planning Application does not assess the combined impact of the two sites.
  
5. **The need for this facility is not proven.** At the Examination in Public of the Waste Core Strategy, the independent Inspector, waste industry representatives and other experts all agreed that the County Council's waste projections were far too high. Their estimate for residual household waste was around 90,000-100,000, rather than the 150,000 predicted by GCC, and on which this application is based. GCC assume waste will rise steadily, whereas even DEFRA is now planning for a continuation of the downward trend of the past 7 years. This facility is far too big and inflexible to meet the county's requirements, and will depend on Commercial and Industrial waste being brought in. It is impossible to monitor and control import of Commercial and Industrial waste into the county, as admitted by GCC officers at the Examination in Public of the Waste Core Strategy. This facility is not being built to meet need in Gloucestershire as stated, but will use market mechanisms to attract waste from further afield.
  
6. **This project does not meet the requirements of the Waste Hierarchy.** The incinerator will act as a disincentive to prevent, reuse and recycle.
  
7. **Additional points (f any):**

Title (Mr, Mrs, Miss, Ms ) .....First Name.....Surname.....

Address.....  
 .....Post  
 Code.....

Email .....

Signature.....

Date.....

**PLEASE FILL THIS IN AND SEND TO:**

The Planning Unit, Environment & Community Directorate, Gloucestershire County Council, Shire Hall,  
 Gloucester GL1 2TH

**You can also fill it in and send it electronically from: [www.glosvain.info](http://www.glosvain.info)**