

228 Prince Rupert Drive
Tockwith
York
YO26 7PU

Tel: 01423 359737

31st May 2009

Applicant Name : BCB Environmental Management Limited
Application Reference Number : NY/2009/0176/FUL

Dear Sir / Madam,

I wish to strongly object to above planning application on numerous grounds as I have detailed below. I would also like to make you aware that I consider BCB's consultation with the village to be wholly inadequate. 2 days in the function room of the village pub one from 12 to 5pm and the other until 7pm during the school ½ term is just not enough time to ensure everyone in the village has had chance to see the application. As a local parish councillor I have had a large number of people complain about this, and I too find this a very valid point. If it was not for the local residents association I doubt the majority of the village would even know the full impact of this application. I strongly urge you to insist that **BCB hold more consultation days including a Saturday** and then give the people of Tockwith longer to respond to the application.

1. Does North Yorkshire County Council need this incinerator?

The reason I ask this question is that NYCC is responsible for the waste strategy for our county as well as being the deciding authority on this sort of application. The entire application from BCB seems to focus on domestic waste and the need of their facility to help NYCC meet their landfill targets. However with the NYCC waste strategy in tatters and with them now proposing monster sized incinerators only a few miles away, why do we need two incinerators in rural locations? But more importantly why do we need one at all? Until NYCC have ticked all the boxes with respect to waste reduction and treatment and done all they can **they should not build incinerators anywhere!** As a council tax payer to NYCC I find it disgusting I still cannot recycle plastic, cardboard or paper from my doorstep while only a few miles away in West Yorkshire, this is the norm. **So I ask the NYCC to only look at incineration as a last resort and not to use private incinerators as a back door solution to their own problems.**

2. Road infrastructure.

There is only 1 entrance to the business park. This is off an unclassified road from the B1224 which in itself is a dangerous road prone to flooding and road accidents. As was seen only a few weeks ago when the unclassified road was closed due to a terrible road accident the entire area was grid locked and the whole business park was inaccessible. So what will it be like with an extra 92 HGV movements up and down the road each day including Saturday mornings! **This is a country lane, not a trunk road. I will seriously consider whether it was safe to use such a road on my push bike in the future – how green is that?**

3. Business Park

Quite simply the business park is a business park and not an industrial estate and therefore only has 1 access point for emergency services and likewise only 1 exit for other people on the business park who may need to evacuate in the event of an emergency. This may sound extreme, but this nature of business is dangerous and to my knowledge BCB had 2 very large scale emergency service responses only last year. I also ask you spare a thought for the existing businesses on there. If you were selling kitchens, brewing local beer or making cheese how would you feel when fire engines turn out to deal with the incinerator next door who's burning 60,000 tonnes of waste? I would imagine that this application will have a very detrimental effect on the business park and will result in a number of businesses leaving the site all together. I ask that this is considered very carefully when BCB's own claims that there will be a net gain in employment of 18 low grade jobs is considered.

4. Proximity Principle

BCB claim that they meet the proximity principle. I strongly object to this claim. The purpose of this incinerator is clear when you read page 27, 3.6 of the Environment Statement.

*The Tockwith EfW plant will be located adjacent to the existing hazardous waste transfer station that is operated by BCB. The existing waste transfer station accepts hazardous wastes from a variety of sources. BCB employs specialist chemists who check and test the incoming waste, categorise and sort it for onward disposal to specialist disposal facilities. Some of the onward disposal facilities recycle the hazardous wastes, while others, where the waste is unsuitable for recycling are sent to landfill. There are a limited number of onward disposal facilities, due to their specialist nature, **and they are often a long distance from the collection and bulking operation at Tockwith.***

BCB bring to the site 14,000 tonnes of hazardous waste each year from all over the country (I know, I've seen the lorries on the M25). Currently they process the waste and then send it onwards to either landfill (expensive) or other specialist facilities. But as admitted by BCB the onward locations are often a long distance from Tockwith. I wonder why? Probably because the operators of these had the sense to locate their facility near the source of the hazardous waste, such as Runcorn or Teesside, not miles from anywhere! The proximity principle is not met, just because BCB are currently shipping in from all over the country to a building next door it does not mean it is right, and it does not mean that because of this they can move it next door and burn it. The question has to be asked why this was ever allowed here in the first place and **increasing the movement of hazardous waste across the country to 20-30,000 tonnes per year does not meet the proximity principle.** Yes, I'm sure the 'top up' of the incinerator with domestic waste does meet the principle for Tockwith (although there are no agreements or alliances in place to even do this). But please see this application for what it is; currently they are paying through the nose to send their hazardous waste to landfill, if they can make it magically 'disappear' then no more landfill tax and therefore more profit. If they can get paid to take domestic waste too then all the better. This initiative is not green; it does not meet the proximity principle and is simply a means of increasing profit for BCB.

5. The Process Itself

Apparently vehicles will enter the building through fast opening doors before they unload to minimise smells and pests. According to BCB's figures this still means for every hour of operation the door will be open 10% of the time. This is more than enough time to emit noxious smells over the nearby homes that are already suffering from smells radiating from the business park. I do not believe BCB's proposal is adequate to stop smells blighting people's lives. With respect to rodent and pest problems, if the door is open 10% every hour then I think they will have more than enough time to get in! Based on this I object to the application due to smells and pest problems.

The proposed building would have a bunker large enough to store waste for 4-5 days of incineration. The only means to stop this going anaerobic while it is stored is for the crane operator to occasionally turn the waste. (Page 29,3.2 of ES) Knowing what human nature is, I strongly question whether this will happen and once waste has gone anaerobic it is too late, the smell will be there and therefore being blown over our homes. This is bound to happen at some point and if you were working there and it began to stink, what would you do? Open the doors and windows? I do not believe BCB have chosen the best solution here.

Likewise, the same crane operator (via the use of CCTV) is going to be responsible for finding the unsuitable / unauthorised waste from the pile and separate it out while loading the primary chambers. Again is this really the best technology? At 3am on a Thursday morning, will the crane operator really be that vigilant or will they just shove it all in? I have major concerns this process is far too reliant on people and chance. In some respects Hazardous waste will be more controllable, how do they know what is in the black sack from Joe Blogs at number 30? There could be ANYTHING in the bag and BCB wouldn't know.

6. Drainage

The business park itself discharges **ALL** its run-off from the site into Fleet Beck. With the best will in the world there is no way on this earth >60,000 tonnes of waste can be brought on site with none of it leaking and getting onto the ground. Only last year leaking barrels were brought onto the site and the fire brigade had to be called due to a reaction of chemicals. These will run-off into the beck and pollute the local environment, so I object on local ecology grounds. Facilities like this should be built in proper purpose built areas that have proper drainage systems – not just run-offs to local becks. In addition to this the entire site is on a major aquifer.

7. Noise Levels

I have major concerns over noise, with so many vehicles entering the site per day and it being so close to the hundreds of homes on Prince Rupert Drive this is going to be a major source of distress for people. People already complain that the beeping from lorries reversing wakes them early in a morning so this can only get worse!

In addition to this BCB are proposing new technology to cool the steam generated from the process. In the last application BCB were shown to be lacking when it came to proposing new technology. So much so they withdrew their application and have re-submitted this one. I was actually told at the consultation day that if they had gone for water cooling (in previous application) we would have all died of Legionella! They are now proposing 3 x 12m external air cooled condensers, i.e. huge fans blowing 24/7 and probably a lot harder in the summer. In their own noise report (appendix 12.1) the report admits, 'manufacturer's data are limited, as are other installations/facilities offering the opportunity to survey. Source noise levels are estimated and listed below'. Once again BCB are proposing something that has never been tried before. **I strongly object to such experimental technology being used so close to people's homes. The technology used should either be a known technology with known effects or if they are to use experimental technology it should be thoroughly tested and the data then submitted with this application, you should NOT make a decision based on estimations (by the manufacturer) on such an important issue of noise pollution.**

8. Visual Impact

Tockwith is in the Vale of York, the area is flat. A 31m chimney will be visible from all over the area and will have a huge impact on the area, especially on cold days when the plume from the chimney will be visible.

BCB claim the orientation of the new building will improve the visual impact; this is not necessarily true. The only reason the building is like it is, is for BCB's benefit when it comes to vehicle movements. Dependent on where you are stood in the village the new orientation would actually be worse.

9. Electricity Generation

Just as above, this is complete sales spin. Are they really going to lay a cable to Wetherby just to connect to the grid? If they are then so far they have done nothing about it and have not consulted with anyone about digging up their land. So how do they know this is even possible? For the information of the decision makers P37, 3.65 of the Environment Statement is complete nonsense. I know of no problem with electricity supplies to the village and have certainly never suffered myself.

10. District Heating

The reason I raise this as an objection is that BCB seem to see this as a sales pitch and carrot for the village (as well as yourselves with any affordable housing schemes you may have for Tockwith). I have made enquiries with BCB about this and have been told unless EVERYONE on Prince Rupert Drive takes up the offer it will not be offered. In addition to this we would have to pay for the connection of hot water from the road to our homes, adapt our heating systems and then still maintain our existing system incase they have a breakdown and to cover their 2 week shutdown. Is this really a viable option? No, it's a sales spin and reading how they have described it in their application; it's misleading too!

11. Location within the local area

It is only 370m from a site of special scientific interest, the Aubert Ings and 3.35km from one of the most historical battle grounds in our country. BCB claim it will not be effected by their 31m chimney but I severely doubt this and doubt that most historians would want an incinerators chimney in the corner of their eye when they look out from the world famous Cromwell's plump.

More importantly this site is 430m from a major housing estate and even more worryingly 1000m from a primary school. That means people and children will be living, sleeping and going to school downwind of the emissions from BCB. I am not an expert in emissions and air pollution, but what I do know from A-level chemistry is the simple rule what you put in to a reaction must come out. BCB claim emission levels are within limits but a lot of emissions are unregulated and this includes the very small particles most commonly associated with respiratory disease. Any emission of heavy metals, chemicals and particles cannot be good whatever the level, and I ask a simple question. If you had a choice, would you want to breathe what BCB are proposing to emit? I certainly don't nor do I want my 4 year old too. I believe building an incinerator

DOWNWIND and only 1000m from a primary school is actually dangerous and I urge you to object to the application on this point alone. Nobody really knows what the long term effects will be of something like this, so nobody should be allowed to build something like this so close to homes and schools.

I hope by reading this letter you understand I object to the application in the strongest possible terms and that you pass this letter onto the appropriate committee when the planning application is considered. I also ask that you acknowledge receipt of my letter.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'Mark Algar', with a stylized flourish at the end.

Mark Algar