



Campaign to Protect
Rural England
NORFOLK

Mr Mike Jackson
Director of Environment, Transport and Development
Planning Services
Norfolk County Council
County Hall
Martineau Lane
Norwich NR1 2UD

3rd August 2011

Dear Mr Jackson

**Application No. C/2/2011/2020 – Proposed Energy from Waste facility,
land at Willows Business Park, High (Saddlebow) Road, King's Lynn**

CPRE supports the Waste Hierarchy and the judgement within it that recovering energy from waste is an appropriate way to minimise the impact of landfill. However, we believe that incineration is the least desirable alternative to landfill. Other technologies are available which are more environmentally friendly and cost-effective in reducing greenhouse gas emissions.

Having carefully studied the application documents and visited the site, we write to **object** to the proposed incineration plant at Saddlebow on the following grounds:

- **Location** - The site is situated on the far western edge of Norfolk, resulting in a significant increase in HGV movements throughout the county to feed the plant for 24 hours per day, every day for 25 years. The applicant states there will be up to 270 two-way vehicular movements per day on High (Saddlebow) Road. Managing waste is heavily transport-dependent, with obvious effects on the beauty and tranquillity of the countryside. To treat and dispose of waste in reasonable proximity to its point of generation is the principle that works to minimise environmental impact and cost of waste transport.
- **Recycling and Composting** - We are concerned to note that the County Council's recycling and composting figure for 2009/10 stands at 43.5%, whereas neighbouring authorities are achieving up to 70%. We need to be satisfied that the waste stream is minimised by prevention, reuse, recycling and composting. The County must avoid the danger of providing more capacity in the lower levels of the Waste Hierarchy - incineration in this case - which discourages recycling. The 25 year PFI contract with Cory Wheelabrator will be such a danger. There is a risk that the operator will ship in waste from

CPRE Norfolk
86 St. Benedict's Street
Norwich
NR2 4AB

Telephone 01603 761660
Email: info@cprenorfolk.org.uk
www.cprenorfolk.org.uk

President
Professor Tim O'Riordan

Chairman
James Parry

Treasurer
John Davies

The Campaign to Protect Rural England exists to promote the beauty, tranquillity and diversity of rural England by encouraging the sustainable use of land and other natural resources in town and country.

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further distances with serious implications for amenity and greenhouse gas emissions. Moreover the 25 year PFI contract leaves no flexibility to respond to future innovations in resource and waste management such as plant-based packaging and the diversification of recyclable materials. Over time, these innovations could result in far less non-recyclable waste, with the Council locked into feeding an outdated incinerator.

- **Landscape & Visual Impact** - The applicant states that the proposal would be of insufficient magnitude to adversely affect the inherent character of the landscape. We disagree, since the cumulative impact of the proposal together with the existing industrial complexes of Palm Paper and Centrica Power Station (both with permissions to extend) will dominate the skyline of this Fenland landscape. The incinerator's 85m chimney stack, with its aviation lights, will be visible within a 20km radius of the site – a distance which includes The Wash, with its many nationally important nature conservation designations, beyond Sandringham to the north and encompassing Swaffham, Downham Market, Wisbech and many villages.

- **Air Quality Emissions** - CPRE does not accept the applicant's statement that *'Overall the effects are not considered significant in terms of emissions'*. The Health Protection Agency's conclusions on the impacts from emissions from incineration are challenged, both in the UK and Europe, by studies which come to a different conclusion. Toxic emissions from the stack could be blown downwind over King's Lynn, The Wash and agricultural land, affecting soil, water and livestock. Local people are apprehensive and fearful for their children's health which, we believe, can be a material consideration in planning.

- **Amenity and Social Economic Impact** - CPRE is not only concerned about the beauty and tranquillity of the countryside but we are also concerned about the built environment. The choice of King's Lynn as the site for the county's incinerator dealing with the residual, commercial and industrial waste for the whole county will endanger the social and economic viability of the town and the furthering of its Growth Point status. It will certainly not enhance the image of the town as somewhere in which to live, work and invest.

- **Nar Ouse Regeneration Area (NORA)** - The South Lynn Millennium Community, one of only six such projects in the UK, is part of a £250m government initiative towards regeneration of a 48 hectare brownfield site south of the town centre. It is intended to attract new high skills employment opportunities allied to high quality housing. It would be wholly inappropriate to place a further industrial complex with its associated traffic implications close to the A47 which forms the southern boundary of the Regeneration Area.

- **Local Democracy** - The Localism Bill has signalled the Government's intention to allow people the power to initiate referendums on important local issues. Local authorities and other public bodies are required to take the outcome of referendums into account and consider what steps to take in view of the result. In this case, 93% of residents voting in a local referendum were against the proposals, as are the Borough Council and the two local MPs. In our view the planning application should never have been brought to the table, given the weight of objection.

We should be grateful if you would inform members of your Planning Committee of our objection to this application for the reasons outlined above.

Yours sincerely

James Frost
Director

CC: David Parkin, Principal Planner, King's Lynn & West Norfolk Borough Council