

ISSUE 5 – SPECIFIC SITES

Question 1: Javelin Park

We are not opposed to the use of Javelin Park for waste infrastructure, so long as the criteria for use of the site are clearly specified and restricted. We support the submission and recommended amendments from the Green Party in relation to Javelin Park, but would like to add the following points:

1. **Visual impact and height.** The existing planning permission for the site restricts maximum ridge height to 15.7metres for very good reasons. Anything higher than this would have a severe visual impact on nearby settlements such as Haresfield and Standish, on the AONB and from both sides of the Severn Vale escarpment. Different technologies have a different footprint and height, and therefore height restriction is one important reason why waste technology for the site should be specified within the WCS (as recommended in the Green Party submission). A mass-burn incinerator would be around 45m high, with a stack of over 70m. This would be in contravention of the existing planning restrictions that have been agreed by Parish and District councils and which have full local support. Disregarding these would fly in the face of the sentiments of the Localism Act, whereby “the Government thinks that local communities should have genuine opportunities to influence the future of the places where they live” (Department of Communities and Local Government, 2011). At present the most iconic and visible building in the Severn Vale is Gloucester Cathedral, which at its highest is 69m. An incinerator would dwarf this, becoming the most noticeable structure in the Vale, and blighting views from local settlements and from many beauty spots along the Cotswold escarpment and from May Hill. We object strongly to the disingenuous statement that a waste facility would be a ‘landmark facility’ – it would not be.

CD1.1 Appendix 5 Site 3 should be amended to specify that *“any waste facility on the site should have a maximum ridge line height of 15.7m, in line with existing agreed planning restrictions.”*
2. **Other points.** We reproduce points made about Javelin Park under previous Issues, for ease of photocopying:

Annexe E of PPS10, point c. Visual Intrusion, requires waste planning authorities to protect landscapes of national importance, including Areas of Outstanding Natural Beauty. The AONB Cotswold escarpment, and the national trail of the Cotswold Way, are of national importance largely

because of the views they provide of the Severn Vale, yet this has not been considered when proposing sites, particularly the Javelin Park site, as a likely location for mass burn incineration. A large waste facility would have a massive impact on views into the Vale.

Javelin Park is not well placed for processes which generate heat, since it is not possible from this site, without the addition of considerable network infrastructure with its attendant adverse environmental impact, to meet the EU Waste Incineration Directive requirement that 'heat generated during the incineration...process is recovered as far as practicable e.g through combined heat and power, the generating of process steam or district heating' (EU, 2000).

Ozone is "formed by the action of sunlight on oxides of nitrogen (mainly from vehicle emissions and industry) and volatile organic compounds (VOCs) (mainly from vehicles, solvents and industry)....Peak ozone formation takes place downwind of precursor sources in sunny weather with low wind speeds." (APIS, 2011) The Cotswold Beechwoods are downwind from Javelin Park, and therefore most likely to be affected by ozone forming as result of emissions from an incinerator there.