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ARDLEY INCINERATOR REF 8. 1/54261/9 ARDLEY EFW

We refer to the above application by Viridor to build an incinerator at Ardley.

We are unable to comment on the health and environmental pollution aspects of the proposal, but understand these will be carefully scrutinised by the Health Regulatory Authority and the Environment Agency respectively should the application be approved in principle. Suffice to say, we understand that the technology proposed is not exactly 'state of the art', and that later developments such as mechanical biological treatment together with plasma gasification should perhaps be researched more deeply before any firm decisions to proceed are made.

We also understand that Viridor have had little, if any, experience of running the sort of plant for which they are applying.

Our objection to the proposal rests on two areas of particular interest to our aim of protecting rural Oxfordshire:

- 1) the building itself, with a stack 82 metres high, brings an industrial feel to what is essentially a very rural landscape. The impact on the surrounding countryside will be marked, and this leads us, inter alia, to query the scale of the project.
- 2) the implications of operating a scheme of this size on the dependent existing transport system are clearly onerous, possibly fatal. Not only does the raw waste have to be brought in, all on existing roads, but 75,000 MTPA of bottom ash needs to be sent out, and a further 12,000MTPA of toxic fly ash removed for specialised disposal elsewhere (Gloucestershire?). We calculate this will mean over 500 lorry movements per day or approx 125,000 movements per year. This may be feasible where there are routes available with adequate

capacity, but the B430 carries more than its fair share of HGVs, and is already overloaded. A comprehensive survey is required of the traffic, plus the overall air quality and CO2 emissions, impact on all roads in the vicinity that will be involved in the operations associated with this plant.

Both the above areas of concern touch on the aspect of scale, which is highlighted by both this and the Sutton Courtney proposal. One has to ask why, if the County has approx 175,000 MTPA of waste to dispose of, it needs two 300,000MTPA incinerators? The implication is that the operators (and presumably the County) wish to make money out of disposing of other counties' rubbish, but at the expense of the local population. This seems particularly the case of the Ardley proposal where, we understand, neighbouring counties like Buckinghamshire are waiting to make decisions on their waste disposal plans depending on how Oxfordshire moves forward.

It may be that some form of incineration of the final level of the waste hierarchy is required. However, it would seem sensible to keep such units small in scale to minimise the visual impact on the landscape; minimise the lorry miles needed to feed them, and so minimise the additional CO2 emissions involved; and to put these combined heat and power units closer where this value-added output is required.

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