

Communications:

In writing to Minster-on-Sea Parish Council, Love Lane, Minster-on-Sea, Sheerness, Kent ME12 2LP

By telephone to: (01795) 873831

By e-mail to: clerk@minsteronseapc.co.uk



MINSTER -ON-SEA PARISH COUNCIL

STATEMENT

OUR INDIVIDUAL REFERENCE NUMBER : KEM3-001

DATED: 2ND MARCH 2020

Re: Application by WTI/EFW Holdings Ltd. for a Development Consent Order for the Wheelabrator Kemsley (K3) Generating Station and Wheelabrator Kemsley North (WKN) Waste to Energy Facility (K3 and WKN) in Sittingbourne, Kent

In introducing itself, Minster-on-Sea Parish Council on the Isle of Sheppey in Kent, is the closest elected tier of local government to the community representing the interests of approximately 17,000 residents. To summarise its position, the Parish Council has serious concerns about this application and it asks that you recommend refusal of Wheelabrator Technologies Inc.'s application for a Development Consent Order (DCO) on the following grounds: -

Firstly, the impact on traffic flow is important. The Swale Way / A249 dumbbell roundabout (known as the Grovehurst roundabout)) is currently regularly gridlocked at extended peak periods with queues stretching back to the Swale Way / Barge Way Roundabout and at times as far back as the DS Smith main entrance for over half a mile. The Swale Way / A249 dumbbell roundabout is at the evening peak, for traffic that is travelling northbound on the A249 wanting to access the Grovehurst Roundabout is regularly queued back onto the A249 main carriageway which also presents as a serious safety hazard.

Allowing this application would be in direct conflict with Highways England advice that it will not support any further significant sources of traffic generation (on the A249 corridor) until the Stockbury M2 / A249 Junction 5 upgrade is completed (taken from Planning Reference:

17/505711/: Land at Wises Lane, Borden, Kent ME10 1GD also Planning Ref: 19/501921/FULL: Land At Belgrave Road Halfway Kent ME12 3EE and press article <https://www.kentonline.co.uk/sheerness/news/roads-chiefs-put-brakes-on-plans-for-new-housing-206252/> Furthermore, there is no consideration in its review of committed developments of the enormous Aldi Southern Region Distribution Centre which is now operational and providing the requirements for 120 Aldi stores throughout the south and south-east. (An Aldi store on average has 3 HGV Aldi deliveries per day noting that 100% of this HGV traffic will pass through the Stockbury M2 / A249 Junction 5.) Neither does it consider the Morrisons' Warehouse which is alleged to accept a vehicle every two minutes.

Secondly, the impact on the Grovehurst Roundabout which is a single carriageway dumbbell roundabout will be substantial. This is because it has a lower capacity than a single lane circular roundabout and half the capacity of a two-lane circular roundabout. (The capacity of a roundabout varies based on entry angle, lane width, and the number of entry and circulating lanes. As with other types of junctions, operational performance depends heavily on the flow volumes from various approaches. A single-lane roundabout can handle approximately 20,000–26,000 vehicles per day, while a two-lane design supports 40,000 to 50,000.) Although there is a plan to update this roundabout, with no funding currently in place, this could take several years to achieve. Therefore, allowing this application will result in total gridlock. For example, traffic approaching the Grovehurst Roundabout from the D.S. Smith facilities themselves and traffic travelling north along the A249 route is already gridlocked at peak periods. This proposal will exacerbate the existing problem unless significant improvements are made to the highway network. The Parish Council estimates that over the year, one million and forty-seven tonnes of waste will be carried by approximately 200,000 per annum additional heavy goods vehicles (HGVs) movements and this very significant number of HGVs and cars will descend upon this area due to their involvement with these proposals. This is in direct conflict with Paragraph 32 of the National Planning Policy Framework (NPPF) which makes it clear that: “Development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe”. To mitigate this effect, it is suggested that the DCO should not be applied for until the proposed upgrading of the Grovehurst Roundabout is completed. If this application is permitted, the opportunity to travel along these routes within a reasonable timescale will be severely compromised or in the worst-case scenario even lost.

Thirdly, the Parish Council is also seriously concerned about the environmental impact of, what appears in effect to be the doubling of the current level of waste coming into the area, with both the expansion to the existing Generating Station and the introduction of the WKN facility. Not only will the increased capacity of the facility lead to substantially more waste delivery traffic, with a corresponding increase in HGV exhaust pollution, but the disposal of the products of burning – bottom ash and flue dust – will generate yet more traffic locally. Flue dust in particular is a hazardous waste product and constitutes around 8% of the raw waste input. The only licenced site in Kent for flue dust disposal is at Norwood Farm Landfill on the Isle of Sheppey, a mere 3 miles from the proposed WTE plant. The applicants have outsourced their flue dust disposal, without revealing its destination, but the likelihood of it being anywhere other than Norwood Farm is highly improbable. Allington WTE plant, Maidstone, already uses it as the most cost-effective option. Use of Norwood Farm would produce an additional 8000 20-tonne HGV movements per annum (to and from the Sheppey site) along already heavily congested roads, with all the extra vehicle pollution that would entail for local residents. Fugitive emissions of toxic fumes, regularly reported from WTE plants elsewhere, would be carried directly towards Sheppey on the prevailing south-westerly winds – so constituting another potential hazard to the residents of the same area within which the flue dust would be disposed of.

In addition to the above, the Parish Council has concerns over the future capacity of the two plants, currently the 49.9MW site is capable of disposing of 550,000 tons of waste each year. The plans include a 25.1MW increase to the current Generating Station, but only to dispose of an additional 107,000 tons of waste each year. The WKN facility will produce up to 42MW, but again will dispose a maximum of 390,000 tonnes of waste each year. It seems obvious from the maths that since both facilities will be built to significantly increase waste disposal in the future, the current proposals do not include any details of possible future expansion. Bearing this in mind, there are concerns that should demand continue to outstrip supply, then both sites could quickly be required to take on additional waste disposal. This is seriously concerning and must be addressed as a priority.

The Parish Council asks why an application for the 75 MW CHP was not applied for from the onset when it constitutes a Nationally Significant Infrastructure Project (NSIP) where an application for a DCO is required? The K3 CHP plant was clearly designed and constructed to be able to operate at an output level of 75MW from its design inception. The Parish Council

also questions the applicant's failure to provide a proper report on the Traffic Flow Data for the K3 – 75 MW CHP which is imperative if you are to properly understand this application and its effect on the highway network. In its place are separate spreadsheets which are confusing and not at all transparent as the process should be. Further questions could also be asked about the environmental impact with no information supplied on continuous or periodic monitoring. The percentage of refuse collection vehicles, flue ash and bottom ash waste also needs to be known. Here, there are concerns that the periods for waste deliveries will have a knock-on effect on the Grovehurst A249 Junction and M2 junctions as most of the deliveries are scheduled to take place during peak periods.

For all these reasons and more Minster-on-Sea Parish Council asks you to refuse permission of the DCO. The proposal provides no solution to the negative effect on the highway network and the consultation that underpins it is simply not fit for purpose due to its failure to provide adequate and transparent information on Traffic Flow Data.