

## **Annex D. Transport**

The two page Summary (10 Reasons For and Against) and Annex A, Alternative Technologies, have already made the case that a centralised waste strategy that brings at least 300,000 t/yr to a central point at Lower Greatmoor Farm is unnecessary. But if it does go ahead, this annex firstly sets out what the implications are. The main implication is the construction of a road from the A41 via a disused railway line. The annex, secondly, finishes with two paragraphs on transport implications if, as SAVI proposes, several ATT plants are installed.

### **Calvert Transport from the A41 via the disused railway line**

Buckinghamshire County Council (BCC) commissioned a Transport Assessment from Jacobs Engineering in summer 2008. Unfortunately it was not delivered until spring 2009. Accordingly there are important parts which have been over taken by events.

The original tonnage quoted in the consultation document has been exceeded many times by the addition of green waste, waste from out of county and extra tonnage required to achieve incineration profitability. The green waste tonnage is unclear on top of the 300,000 t/yr minimum for incineration currently declared but could it be increased again?

In our opinion, the above renders the transport paragraphs from Mr Gibson's letter of 19<sup>th</sup> May '09 to Mr J Bercow MP almost worthless. He said "*The County Council's initial transport evaluation, should Calvert deal with all of Buckinghamshire's household waste, based on 260 working days a year, results in 102 vehicle movements a day (two way), representing a 0.66% increase in the Annual Average Daily Traffic on the A41 in 2013 and a projected 0.57% increase in 2026. Further analysis of the 102 daily vehicle movements shows that this involves 29 seven tonne Refuse Collection Vehicles (RCVs) from Aylesbury Vale (which already use the site) and 22 tonne bulk carriers which would bring household waste from the southern districts*".

Mr Marcus Rogers' of BCC letter to Mr Prideaux (a member of SAVI) of 27<sup>th</sup> October 2008 says "*The carbon footprint, in terms of the distance that waste is carried, is an important element of the Sustainability Appraisal which underpins the Minerals and Waste Core Strategy and forms part of the accompanying evidence base*". This rests uneasily with his letter of 13<sup>th</sup> August in which he says "*On the wider issue of waste transfer by rail – and of waste arising in Buckinghamshire – it remains an unfortunate fact that, in sequential consultations, neither the waste nor the rail industry have shown interest in providing such facilities*". We wonder who is in charge – the industry or the planners?

Reverting to the Jacobs report which covers the tonnage delivered by rail which will fall due to landfill tax and recycling it would be absurd not to use this capability in the future from west and south and east in due course.

The A41 roundabout assessments are not clear. The Bicester Village junction is omitted. What is the impact of Aylesbury Parkway Railway Station and The Berryfields development in due course? Will there be a Waddesdon roundabout? There will be a Woodham roundabout for the purposed access and maybe Westcott too for the expanding venture park. The impact on these roundabouts caused by paragraph two above would be enormous. Each roundabout would be subject to a 30 mph limit, and this would have a significant effect on traffic flow.

Is the Jacobs summary of transport impact on the A41 still credible? It seems not.

BCC Policy 28 in the Minerals and Waste Plan 2004 to 2016 states "*The County Council will protect the amenity of all those who may be affected by mineral and waste development proposals which are likely to generate significant adverse levels of disturbance, both near the site and on routes to and from it, from noise, vibration, dust, fumes, gases, odour, illumination, litter, birds or pests*". (Please see the Ecological Effects paragraph below.)

We quote below some extracts from the Jacobs Report, Appendix F, Social and Environmental impacts, followed by our comments.

### **Hazardous Loads**

*“Hazardous loads can refer to liquid or solid substances that have been tested and assessed against internationally agreed criteria and found to be potentially dangerous (hazardous) when carried (Health and Safety Executive). The development at Calvert could result in the production of hazardous fly ash. Appropriate measures will be put in place to ensure the safe transport of these loads”.*

Jacobs are traffic consultants and we would not expect them to appreciate the understatement in this paragraph. But we can state that the development of a mass burn incinerator at Lower Greatmoor Farm **would** result in the production of hazardous fly ash. Moreover, the bottom ash would also be classified as hazardous. Both fly and bottom ash need to be disposed of in landfill sites for which special permission is needed. If this is granted the site would become available for other hazardous waste along with a dozen or so others in the country, thereby attracting yet more lorry movements, and hazardous as well.

### **Ecological Effects**

*“Ecological effects are generally considered significant where for example a chemical spillage may be possible, or there may be removal of hedgerows or habitats. These would need to be assessed in concert with any proposal for improved/alternative access to the Calvert site. Previous applications to develop access utilising the Akeman Street siding corridor were refused because of their associated ecological effects”.*

The Lower Greatmoor Farm site proposed for the mass burn incinerator is surrounded by sites of Special Scientific Interest e.g. Ham and Home Wood, also Grendon Wood where Shakespeare wrote “Mid Summer Nights Dream”, Doddershall Wood, Sheephouse Wood and Finemere Wood owned by the Bucks Berks and Oxon Wildlife Trust which are all of national importance. Because some of these are within half a kilometre of the proposed Mass Burn Incinerator, Natural England will be a statutory consultee to ensure that the SSSIs are not jeopardised. It seems that the result of that consultation will be the same as the last sentence in the quoted paragraph above.

It will be seen that the transport issues surrounding a centralised mass burn incinerator may not be technical like incineration itself but they none the less pose considerable, and in our view insurmountable problems.

### **Transport Implications of Several ATT plants**

This is the alternative that SAVI proposes, i.e. instead of one centralised mass burn incinerator of 300,000 t/yr capacity, two or three ATT plants of about 50,000 t/yr capacity should be widely spaced around Buckinghamshire. It's easy to see that this will massively reduce traffic movements at a stroke. Moreover, none of those movements will be for hazardous waste.

In Aylesbury town we already have several businesses that handle 50,000-100,000 t/yr volumes, e.g. Shanks Recycling and ASM, and we've lived with them for years without much fuss. The traffic movements that they generate are rather unobtrusive for two reasons: first, they're in well planned high traffic areas anyway, not in remote low traffic country areas; second, they each generate one sixth to one third of the traffic required for a central mass burn incinerator.

CJP