

At: The Old Brickworks, Puddock Hill, Warboys, PE28 2TX

Applicant: Mr Jonathan Field, Thermeco Energy Ltd

Application Number: CCC/22/151/FUL

For: Construction and operation of thermal treatment facility for the generation of electricity from non-hazardous, residual waste (post-recycling); including associated plant and infrastructure, vehicular access, car parking and landscaping

To: Planning Committee

Date: 8 October 2025

From: Head of Planning

Electoral division(s): Warboys & The Stukeleys

Purpose: To consider the above planning application.

Recommendation: That permission is **refused** for the reasons set out in paragraph 24.1 .

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# 1. Introduction / background to the application

- 1.1 This application is brought to the Planning Committee to determine because it raises complex policy and other issues, the County Councillor for Warboys and The Stukeleys has asked that it be decided by the Planning Committee and there is a significant level of public interest in the proposal.
- 1.2 A waste recycling facility has been in operation within the waste management complex known as Warboys Landfill Site since 1996. Until 2014 this was within and adjacent to the former brickworks buildings which have since been demolished. Planning permission (reference H/05016/12/CW) was granted in April 2013 for the construction and operation of a permanent materials recycling facility (MRF) and a separate office building on the site of the old brickworks. Since 2014 the waste recycling operations have been conducted within and adjacent to the MRF building. The full planning history of the recycling area is set out in section 4.
- 1.3 Planning permission (reference H/5002/18/CW) was granted on 15 July 2019 for:

“Construction of a heat and power plant comprising biomass energy from waste (fluidised bed combustion) facility and treatment of waste water by evaporation treatment plant and associated infrastructure comprising tank farm, combustor with 25 metre high chimney (stack), process building, store building, office building, walking floor canopy, car park, fuel storage bays, fire water tank, conveyor, pipe gantry, diesel tank, control room, auxiliary plant skid, high voltage transformers”
- 1.4 The planning permission was subject to 7 pre-commencement conditions, only one of which was discharged by the applicant, Sycamore Planning Ltd. The application area was for the most part the same as the area for which planning permission is currently being sought by Thermeco Energy Ltd (Thermeco). Initially Thermeco suggested that their proposal could be carried out by varying the terms of planning permission H/5002/18/CW. They started to address the outstanding pre-commencement conditions but realised that they would be unable to do so before the permission expired on 15 July 2022. In any event, the development proposed by Thermeco differs significantly from that of the original scheme and cannot reasonably be considered as a variation of planning permission H/5002/18/CW.
- 1.5 Thermeco did not seek formal pre-application advice from the Waste Planning Authority (WPA). In June 2021 the WPA agreed with Thermeco that a new planning application would be submitted and that it would be Environmental Impact Assessment (EIA) development. EIA is a process used to assess the significant effects of a development proposal on the environment ensuring that they are properly understood before decisions are made. An applicant may agree with the planning authority the topics for inclusion in the EIA and the level of detail in which they should be covered in a process known as ‘scoping’. Thermeco did not obtain a formal scoping opinion from the WPA but it was agreed informally that the Environmental Statement (ES) should cover the same topics as the ES that accompanied planning application H/5002/18/CW.
- 1.6 The current planning application was submitted on 28 December 2022 but was invalid for a number of reasons including that the ES did not fully comply with the requirements of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017.

Amended and additional information was submitted on 16 February 2023 which enabled the application to be validated. The ES covered landscape and visual impact, air quality, noise, odour, ecology and health impact.

- 1.7 On 12 May 2023 and based on the responses from statutory and other consultees, the WPA made a formal request under Regulation 25 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 for further information in respect of the ES. At the same time Thermeco was asked to address objections relating to matters that fell outside the ES, including compliance with development plan policy. A development plan is a document setting out the local authority's policies for planning proposals in their area. For the current application the development plan comprises the Cambridgeshire and Peterborough Minerals and Waste Local Plan which was adopted by Cambridgeshire County Council in July 2021 and Huntingdonshire's Local Plan to 2026 which was adopted by Huntingdonshire District Council in May 2019.
- 1.8 Further information submitted on 20 September 2024 included the following changes to the proposed development:
  - all the feedstock for the facility would be obtained directly from the adjacent Woodford MRF;
  - reduction in the footprint of the thermal treatment (boiler) building to allow for additional on-site landscape screening; and
  - off-site landscape screening.
- 1.9 Further technical information and revisions were provided on landscape and visual impact, air quality, health, noise, ecology as part of an updated ES. Revised additional information was also submitted to address planning policy matters, including:
  - revised planning statement
  - carbon assessment
  - statement of sustainable design and construction
  - alternative sites assessment
  - economic impact assessment
  - site boundary comparison
  - waste availability report
  - letters of intent to supply the feedstock
  - transport assessment addendum
  - construction traffic management plan
- 1.10 On 28 May 2025 the applicant submitted responses to the consultee comments relating to the September 2024 information. This included:
  - reducing the height of the boiler building from 25 metres to 20 metres
  - an updated ES;
  - revised landscape and visual impact assessment and landscape proposals
  - revised planning statement
  - revised Biodiversity Net Gain (BNG) assessment.

Further information on BNG was provided on 7 August 2025.

## 2. The site and surroundings

2.1 The waste management complex known as Warboys Landfill Site covers approximately 26 hectares and includes the land on which Thermeco's proposed development would be situated. It is located about 10 kilometres northeast of Huntingdon and 4 kilometres southeast of Ramsey, to the north of the village of Warboys on the side of the escarpment overlooking Wistow Fen. It comprises a restored landfill site and overburden storage area, landfill gas engine/flare producing electricity, a MRF, restored ponds and grassland and ancillary land used for access and parking and an administration building. The landfill was a former brick pit which has been filled with waste in a series of cells. The waste recycling operations take place within a modern building on the site of a former brickworks.

2.2 The proposed development site (the Site) has an area of 1.9 hectares and lies between the MRF and the northeastern boundary of the waste management complex. The land immediately to the northeast is Wistow Fen, which is low-lying intensively cultivated agricultural land. The Site is in flood zone 1 and is not within a groundwater source protection zone. It is within 65 metres of the Warboys Clay Pit Site of Special Scientific Interest (SSSI) and Warboys and Wistow Wood SSSI is approximately 460 metres to the west, adjacent to the western boundary of the landfill site. The Site is in a SSSI Impact Risk Zone and the proposed development is of a type for which consultation with Natural England is required. Pingle Wood and Cutting County Wildlife Site (CWS) lies 130 metres south of the site access. There are no scheduled monuments within 3 kilometres of the Site. The closest listed buildings are 1.6 – 2 km to the southwest and south mostly within the Warboys Conservation Area which is centred on the High Street.

2.3 The closest residential properties (measured from the nearest point of the Site to the nearest part of the property's garden) are:

- Woodview 20 metres to the northeast
- Wingate 70 metres to the south
- Old Railway Tavern, opposite the site access onto Puddock Hill
- Fenside Caravan Park 80 metres to the southeast
- The Old Station Yard 140 metres to the northwest.

There are business premises immediately to the northeast of Woodview and a recreation lake between the southeasternmost part of the restored landfill area and Wingate. Long Lot Farm, a mobile home at Wilson's Orchard and commercial premises are at the western end of Fenside Road between 240 metres and 340 metres from the Site. Dorringtons Farm is approximately 650 metres to the northwest of the Site on Cross Drove, Wistow.

2.4 Access to the restored landfill site and MRF for HGVs is via a purpose-built access road from the class C Puddock Road immediately to the southwest of Woodview. The proposed development would also use this access road. The access to the property known as The Old Station Yard which currently runs through the Site would be realigned. No public rights of way cross the Site. Public footpaths no. 245/2 and no. 254/12 are approximately 500 metres to the south of the Site and lead from Humbrills Farm in a southerly direction to Warboys. Public footpath no. 245/7 starts at the western end of Fenside Road and runs around the edge of the Pingle Wood and Cutting County Wildlife Site also leading to Warboys.

2.5 Most of the Site is within the Warboys MRF Waste Management Area (WMA) identified in

the Cambridgeshire and Peterborough Minerals and Waste Local Plan (July 2021) and which is surrounded by a Consultation Area (CA).

### 3. The Proposed Development

- 3.1 The proposed development is a Thermal Treatment Facility (TTF) to process 87,500 tonnes per year of non-hazardous, non-recyclable waste in the form of Refuse Derived Fuel (RDF) to generate electricity. The thermal output would be 31 MWth of which 8.8 mWe would be exported to the national grid, with the rest used to run the plant. The RDF would be sourced from the adjacent MRF run by Woodford Recycling who would be responsible for recovering the recyclable fractions (construction and demolition waste that could be used as recycled aggregate, glass and plastic) from non-hazardous waste, screening for metals and shredding the residual waste to the appropriate size and specification for use as RDF. In accordance with the planning permission for Woodford's MRF, the waste would be sourced from within the administrative areas of Cambridgeshire and Peterborough or a 45 km radius of the MRF, whichever greater. Approximately 90,000 tonnes of waste would be required to generate 87,500 tonnes of RDF.
- 3.2 The RDF would be taken from the Woodford MRF to the Site using the shared access road in rigid body electric vehicles capable of carrying an approximate payload of 14 tonnes. It would be emptied into one of 5 fuel bays which would have rolling shutter doors that would be kept closed between deliveries. The RDF would be delivered by conveyors to the furnace where it would be incinerated in an automated process. The heat generated from the incineration process would pass through a series of boilers which then feed to a turbine and subsequently to a generator. The turbine exhaust would pass through an air-cooled condenser to condense the vapour for re-evaporation in the boiler. The flue gas would be managed through an air pollution abatement system in accordance with the Environment Agency's requirements in the environmental permit. Ash from the incineration process would be collected and removed from the Site, the majority of which would be used in secondary aggregate products. The plant would be designed to allow carbon capture and storage infrastructure to be retrofitted.
- 3.3 Access would be via the existing access off Puddock Road used by Woodford Recycling. Given that the waste would be delivered to the Woodford MRF the only HGV traffic to the Site once constructed would be for the collection of ash and delivery of process chemicals amounting to an average of 1 vehicle (2 trips) per day.
- 3.4 The plant would operate 24 hours per day 7 days per week with a scheduled 2 week shut down each year for maintenance. Waste and ancillary materials would be received between 07:30 and 18:00 Monday to Friday and between 07:30 and 13:00 Saturday. There would be no deliveries on Sundays or bank holidays except in exceptional circumstances and agreed with the WPA. There would be 26 full time members of staff working shifts with 10 on site at any one time. Construction traffic would be most intense during the estimated 4 month period for site set up and enabling works with 2 HGV movements per hour and the estimated 2 month period for mains services.
- 3.5 The physical elements of the proposed development would comprise:

- (i) Fuel bay building – steel-clad measuring 30 metres x 34 metres x 11.5 metres high to contain pre-cast concrete wall fuel bays
- (ii) Thermal treatment (boiler) building – steel-clad measuring 50 metres x 52 metres x 20 metres high
- (iii) Turbine hall – steel-clad measuring 29 metres x 17 metres x 10 metres
- (iv) Office/amenity building – brick with wood cladding finishes measuring 16 metres x 15 metres x 7.5 metres
- (v) Stack – twin-core flues each 44 metres high, 1.4 metres diameter
- (vi) Air cooled condenser – open-sided steel structure with fans on top measuring 36 metres x 17 metres x 14 metres high
- (vii) Fire water tank – galvanised steel measuring 12.5 metres diameter x 10.5 metres high
- (viii) Ash collection area – steel frame with sloping roof measuring 20 metres x 14.5 metres x 11 metres high
- (ix) Steelwork such as platforms, walkways, ladders, stairs and handrails for access and maintenance
- (x) Two weighbridges
- (xi) Security fencing – 2 metre high dark green plastic coated chain link or welded mesh perimeter security fence
- (xii) Acoustic fence – 3 metre high acoustic fence along part of the shared access road close to the property 'Woodview'
- (xiii) Car park (11 spaces including one for disabled persons) with 3 EV charging stations; bike shelter
- (xiv) Surface finishes – concrete except the car park (block paving)
- (xv) Lighting – for roads and building exteriors
- (xvi) Landscape planting - a hedge with trees along the northeast (Fen edge) boundary and between the boiler building and the realigned access to The Old Station Yard

- 3.6 Mitigation for the loss of habitat and biodiversity on the site is proposed off site:
- for great crested newts (GCN) within land owned by Woodford Recycling;
  - oak and white willow and wildflower meadow along the southern boundary (village side) of the restored landfill site; and
  - creation of scrub, ponds and grassland on 1.36 hectares of land at Great Raveley

## 4. Planning History

- 4.1 The relevant planning history of the Site is set out in the following paragraphs.
- 4.2 H/0560/96 – Waste recycling operations granted on 13/09/1996. Allowed the sorting, processing and storage of waste within and adjacent to the former brickworks building. A condition required the use to cease by 31/12/99.
- 4.3 H/0476/97 - Variation of condition 1 of planning permission H/0560/96 to extend duration of waste recycling operations granted on 12/08/1997. Extended the date by which use of the waste transfer station must cease from 31/12/99 to 31/12/08.
- 4.4 H/5008/08/CW - Variation of condition 1 of planning permission H/0476/97 to extend the date by which operation of the waste transfer station must cease from 31 December 2008 to 31 December 2011 granted on 05/08 2008.
- 4.5 H/05013/11/CW -Variation of condition 1 of planning permission H/05008/08/CW to extend the date by which operation of the waste transfer station must cease from 31 December 2011 to 31 December 2015 granted on 23/12/2012.
- 4.6 H/05016/12/CW - Construction and operation of a materials recycling facility, offices and ancillary development granted on 19/04/2013. This replaced the temporary waste transfer station with a purpose-built facility.
- 4.7 H/5007/14/CW - Variation of condition 12 of planning permission H/05016/12/CW to extend the hours Heavy Commercial Vehicles (HCVs) directly associated with the skip hire business may enter or leave the site granted on 05/12/2015
- 4.8 CCC/22/053/VAR - Materials recycling facility, offices and ancillary development. Informative: Section 73 planning application seeking to vary conditions 3, 7 & 16 of planning permission H/5007/14/CW to allow the storage of waste and the crushing and screening of hardcore waste outside the materials recycling facility building and to amend the surface water drainage scheme granted on 19/09/2024
- 4.9 H/5002/18/CW - Construction of a heat and power plant comprising biomass energy from waste (fluidised bed combustion) facility and treatment of waste water by evaporation treatment plant and associated infrastructure comprising tank farm, combustor with 25 metre high chimney, process building, store building, office building, walking floor canopy, car park, fuel storage bays, fire water tank, conveyor, pipe gantry, diesel tank, control room, auxiliary plant skid, high voltage transformers granted on 15/07/2019 (not implemented)
- 4.10 FMW/19/073 - Engineering operations to extend landfill void comprising:
- reworking of fill material
  - placement of non-hazardous waste
  - measures to safeguard Warboys Claypit SSSI
  - site restoration.

Informative: Section 73 planning application to develop land without complying with condition 2 of planning permission H/5022/18/CW to allow until 31 December 2023 to complete restoration. (Condition 2 requires the restored landfill and other land in the

operator's ownership to be managed in accordance with the Site Ecological Management Plan (Etive Ecology Ltd Version 6.0 dated 25 July 2023 including part of the current application area)

## 5. Publicity

- 5.1 The application was advertised in accordance with Article 15 of the Town and Country Planning (Development Management Procedure) (England) Order 2015 by a notice in the Hunts Post on 1 March 2023 and notices at the Site entrance, opposite Coronation Avenue and at Orchard Close, Warboys on 6 March 2023. Discretionary notification letters were sent to the occupiers of properties within 1 km of the Site except those on Coronation Avenue and Orchard Close (informed by Landscape and Visual Impact Assessment (LVIA) viewpoint 1); properties at the eastern end of Fenside Road on the access route ;and Dorringtons Farms because they are close to LVIA viewpoint 4.
- 5.2 The additional information received on 20 September 2024 was advertised by a notice in the Hunts Post on 2 October 2024 and notices at the Site entrance, opposite Coronation Avenue and at Orchard Close, Warboys on 8 October 2024. Individuals who had commented on the application as originally submitted were notified.
- 5.3 The additional information received on 28 May 2025 was advertised by a notice in the Hunts Post on 4 June 2025 and notices at the Site entrance, opposite Coronation Avenue and at Orchard Close, Warboys also on 4 June 2025. Individuals who had already commented on the application were notified.

## 6. Consultation Responses

- 6.1 The following section summarises the consultation responses received from the most recent consultation and where relevant, earlier comments and submissions. The full responses are available on Cambridgeshire County Council's (CCC) public access planning webpages.

Huntingdonshire District Council (Planning) - Object

- 6.2 The proposed development is unacceptable against policies LP10, LP11, LP12, LP19 and LP35 of Huntingdonshire's Local Plan (HLP) to 2036. The application fails to comply with the specific and limited opportunity for development in the countryside provided for in the HLP. The proposal fails to recognise the intrinsic character and beauty of the countryside due to its adverse landscape impact, contrary to Policies LP10b), LP19h) and LP35.

Huntingdonshire District Council (Landscape Officer) – Object

- 6.3 There are concerns about some aspects of the methodology employed in the applicant's LVIA and the significance of landscape and visual effects has been frequently understated. The sensitivity of receptors on footpaths should be high to high-medium not medium or medium-low. The additional viewpoint sought on the footpath to the north of

Wiggs Close, or on the B1040 Ramsey Road, just west of Warboys and visualisation of the development from VP5 have not been provided.

- 6.4 The reduction in the height of the boiler building by 5 metres is an improvement to the scheme. However, the 44 metre high chimney and the limited scope for onsite mitigation remain significant concerns. The proposed development is unsympathetic in scale to the host landscape and would present an incongruous feature in a setting widely identified as sensitive to large-scale and hard edges, which would have long reaching visual impacts. The proposals would lead to the clearance of a vast majority of the existing site features with little opportunity for landscape and visual mitigation, and as such the proposals represent overdevelopment of the site. Of primary concern is the loss of a mature landscape buffer, which currently ranges from 35 metres at its widest point to 15 metres at its narrowest and is shown to be inadequate to soften and screen the existing MRF building from the Fen landscape. The space available for new planting falls far short of what is required to help mitigate the proposed development. The amended planting proposals (September 2024 and May 2025) provide only a limited width of landscaping along the northeast boundary which is inadequate and insufficient to achieve the necessary capacity for mitigation that would help to soften and screen the development from the Fen landscape. Visual receptors on the network of public rights of way in the Fens will experience changes in view, whereby the existing skyline, currently defined by landform and vegetation, with some residential development visible on higher land, would be broken by the taller new features, detracting from the horizontality of the landscape and the important transition from the fens to higher land.

Huntingdonshire District Council (Environmental Health Officer (EHO)) – no objection

- 6.5 Noise – A condition limiting the level of sound from the development when operational to 34dB L<sub>Aeq</sub> 1 hour at any dwelling is recommended. The proposed construction hours are acceptable, but the Construction Environmental Management & Traffic Management Plan (CEMP) needs to be improved to include more information on noise monitoring, a commitment to use broadband reversing alarms and details of a contact point for the public.
- 6.6 Air quality – Most of the queries previously raised have been addressed although 3 points remain unaddressed in the response table [in the Consideration of Consultation Responses 27/05/2025]: ‘Terrain’, ‘Annual and 24-hour benzene concentrations’ and ‘Annual average PM10 and PM2.5 concentrations’. Although not foreseen to be a problem, they should be included for completeness and transparency so they could be addressed. The landfill gas engines and flare controlled under the environmental permitting regime and their impact can be appropriately assessed as part of Thermeco’s permit application to ensure the combined effect is taken into account and appropriate limits set and mitigation imposed for the application site.
- 6.7 The conditions and control measures that HDC would usually recommend to protect residential amenity will be covered by the environmental permit and relate to all activities on site including waste storage, acceptance and throughput, management of the site to control emissions, monitoring requirements and emission limits. With the correct controls in place no significant adverse impact is anticipated from the proposals. The CEMP should be updated to be consistent, robust and enforceable to mitigate the impact of dust.

Environment Agency – No objection

- 6.8 The development will require an environmental permit under the Environmental Permitting (England and Wales) Regulations 2016, Regulation 12.

Natural England – No objection

- 6.9 Designated Sites - The updated ES Section 7 – AQA indicates air quality emissions below the 1% 'significant' threshold for all designated sites including Woodwalton Fen. ES Section 8 – Ecological Impact Assessment concludes minor adverse but not significant impacts through air quality, including ammonia emissions, for Warboys & Wistow Site SSSI and the two CWS. The applicant should explore whether any additional measures could be implemented to mitigate/compensate minor adverse air quality impacts to the SSSI and local wildlife sites, such as an enhanced planting scheme. This will ensure that the proposed development is compliant with national and local planning policy to protect and enhance designated sites. The updated AQA indicates that the proposed Air Quality Mitigation Scheme (AQMS) for a previous application at this site is considered to have negligible benefit in terms of air quality impacts to the SSSI and the rationale for this seems reasonable. Consideration of any additional measures that could help to further reduce the air quality impacts of the current proposed scheme on these sensitive designated sites would be welcomed. Any such measures, if available, should be detailed in the relevant mitigation strategy and delivery secured through planning condition. Delivery of mitigation measures outlined within the Construction Environmental Management Plan (CEMP) and the Dust Management Plan (DMP) should be secured through planning condition.
- 6.10 Protected species - Note that GCN surveys were being updated at the time of writing the revised ES Chapter 8 – GCN Mitigation Strategy (June 2024). The applicant's submission of a Natural England European Protected Species Licence should be secured through a planning condition.

UK Health Security Agency (UKHSA) – No objection; position statement

- 6.11 ““UK Health Security Agency (UKHSA) has reviewed research undertaken to examine the suggested links between emissions from municipal waste incinerators and effects on health (<https://www.gov.uk/government/publications/municipal-waste-incinerators-emissions-impact-on-health>). UKHSA's risk assessment is that modern, well run and regulated municipal waste incinerators are not a significant risk to public health. While it is not possible to rule out adverse health effects from these incinerators completely, any potential effect for people living close by is likely to be very small. This view is based on detailed assessments of the effects of air pollutants on health and on the fact that these incinerators make only a very small contribution to local concentrations of air pollutants.”
- 6.12 No significant concerns regarding the risk to the health of the local population from the proposed installation. Health impacts are assessed at the planning application stage, and then subsequently at the environmental permitting stage. Any environmental permit will require the applicant to ensure that emissions to air from the facility are within permitted emission limits and that abatement measures are in place to minimise the environmental impact of emissions from the process using best available techniques (BAT) under the

environmental permitting regulatory framework and guidance overseen by the Environment Agency.

Health and Safety Executive (HSE) – No comment to make

6.13 This application does not fall within any HSE consultation zones.

CCC Transport Assessment Team – No objection

6.14 The information on the movements/volume of construction traffic appears to be a reasonable estimate for a site of this size. The anticipated volumes of construction traffic would not result in an unacceptable impact on the highway network in transport terms.

CCC Highway Development Management Engineer – No objection

6.15 100% of the plant's feedstock will be sourced from the adjacent MRF which will reduce the number of vehicles accessing the site. Conditions requiring wheel cleaning and traffic routing should be imposed.

CCC Ecology Officer - Object

6.16 Initial concerns about the impact on air quality on designated sites have been addressed. The proposed GCN mitigation strategy is accepted in principle however, as it relies on land outside the applicant's control, it must be secured by way of a legal agreement. It would also need a European Protected Species Licence from Natural England.

6.17 The proposed off site mitigation schemes on Warboys landfill site and at Great Raveley are unrealistic and unlikely to adequately address the impacts on biodiversity. As such the proposed development fails to accord with Cambridgeshire and Peterborough Minerals and Waste Local Plan Policy 20 which seeks to conserve, enhance and deliver gains for biodiversity. It is considered that the three species of scrub proposed at Great Raveley would not realistically achieve 'Good' condition, the proposed species mix is not in keeping with the landscape character of the area and the proposed ponds would not meet all the relevant criteria. Planting trees on the grassland on the edge of the landfill site would substantially reduce the grassland quality beneath/around them. There is no guarantee that other areas of grassland will be completely covered, and so it is likely that areas of bare ground will be in excess of 5%. The landfill site already has an agreed restoration scheme which was designed and intended to compensate previous habitat losses and wildflower meadow remains the most appropriate restoration approach for this site.

6.18 Unless the following information is provided prior to determination refusal is recommended:

- i) Redesign of Great Raveley (off-site) scheme to deliver biodiversity appropriate for the location, using native species of local provenance and creating habitat that is likely to succeed within 30 years;
- ii) Redesign of Warboys (off-site) scheme so that it does not conflict with the existing restoration scheme to restore site to wildflower meadow; and
- iii) Update the BNG assessment to provide realistic target habitats and conditions, taking into account and reflecting the proposed landscape scheme, achievable management and locality.

CCC Historic Environment Team (CHET) - No objections

- 6.19 The proposed development lies in area that was formerly an industrial landscape including the Great Eastern Joint Railway, Ramsey-Somersham and adjacent to the site of a former brickworks (CHER MCB23001). To the south east is a Royal Naval Armaments depot. A condition of planning permission H/5002/18/CW was fulfilled by the production of an archaeological desk based study which created a good record of the site and has now been added to Historic Environment Record (ECB6928). No further archaeological requirements are necessary for this site.

Lead Local Flood Authority - Object

- 6.20 The applicant has not provided drainage calculations to indicate whether the system can cater for the 3.3% and 1% Annual Exceedance Probability (AEP) storm events. The discharge rate from the site is required to be at or below greenfield equivalents for both the 3.3% and 1% AEP storm events.

CCC Public Health Officer – No objection

- 6.21 Many of the points previously raised have been addressed by the applicant. With an increasing number of proposals particularly from the energy and utility sectors within this part of Cambridgeshire, consideration should be given to the overall cumulative impact on local communities. Defer to the UKHSA in terms of research and evidence in relation to potential effects on health of efficiently operated, regulated and compliant municipal waste incinerators. Further details from the developer regarding their role and the administration of the community liaison group would there is no reason to object to the application.

CCC Climate Change and Energy Service (CC&ES)

- 6.22 Concludes that there are a number of uncertainties in estimating greenhouse gas emissions from waste disposal at this proposed development, which mean that it is not possible to state definitively whether or not the development will lead to increased or reduced carbon emissions.

Fire and Rescue Service

- 6.23 Adequate provision should be made for fire hydrants which may be secured by way of a Section 106 agreement or a planning condition.

Middle Level Commissioners (on behalf of Ramsey 1<sup>st</sup> Internal Drainage Board (IDB)) - Object

- 6.24 Object because of the significant loss of habitat units including the three ponds on the application site; the proposed means of surface water attenuation is considered inappropriate by most IDBs; lack of information on surface water outfalls; and lack of discussion with the IDB about obtaining discharge consent.

Cambridge City Airport – No objection

6.25 The proposal does not conflict with the safeguarding criteria for the airport.

The Wildlife Trust – Object

6.26 Support the comments from the CCC Ecology Officer.

Warboys Parish Council – Object

6.27 Object in the strongest possible terms because the application is not consistent with national guidance or local policy. Any potential benefits are far outweighed by the harm it would have on the community of Warboys and the local environment. The application should be refused on the following grounds (reinforced 4 November 2024) :

(i) that the applicants have failed to demonstrate a need for the development which is contrary to the National Planning Policy for Waste, the draft National Policy Statement for Renewable Energy Infrastructure and the Cambridgeshire and Peterborough Minerals and Waste Local Plan;

(ii) that the Minerals and Waste Local Plan projects surplus capacity for the thermal treatment of municipal waste over the Plan period to 2036, as a result of which there is no justification for the proposed development. The subsequent approval of a site with significant capacity at Wisbech since adoption of the Plan reinforces this case;

(iii) that the location of a thermal treatment plant at Warboys contravenes the proximity principle set out in the Local Plan which requires energy from waste plants to be sited in close proximity to the point of origin of the waste. The scale of the plant proposed means that it could be accommodated close to an urban area where waste is generated, thereby avoiding excessive road transport which is contrary to the Local Plan principles of sustainability and minimising any adverse impact on climate change;

(iv) that the applicants have failed to demonstrate the source of the municipal waste to be used as fuel for the proposed plant, creating a concern that this may result in the importation of waste to Cambridgeshire contrary to the principles contained in the Local Plan and generating additional traffic movements. The draft agreements between Woodford, the operators of the adjoining MRF, and other waste operators to supply waste to the site cannot be relied upon either in the short or long term;

(v) that the applicants have failed to demonstrate the capacity of the proposed plant, leading to concern both that more waste could be accommodated in the plant proposed or that it could be expanded in the future if permission is granted. In such circumstances, this would invalidate the results of the various assessments submitted in support of the application;

(vi) that the applicants have failed to demonstrate how residual ash from the plant will be processed on site and where this will be transported for subsequent treatment which is contrary to the draft National Policy Statement for Renewable Energy Infrastructure;

(vii) that the proposal will represent an unacceptable further expansion of industrial development at the site of the Warboys Landfill Site far in excess of the initial permission granted for 5 years for the tipping of waste at the adjoining landfill site. The cumulative harm to the locality from the further intensification of use will outweigh any potential benefit from the co-location with adjacent waste management facilities.

(viii) that not all of the site of the proposed treatment site is located within the permission granted for the MRF and therefore constitutes an extension into the open countryside;

(ix) that the application contains no convincing evidence that the proposal will not lead to additional traffic movements on local roads. While the applicants contend that all of the waste to be processed can be accommodated within the permission granted for the volume of waste to be handled at the adjoining MRF, the material handled to date at the MRF has been supplied in skip vehicles and therefore a significant increase in traffic compared to the present day will be required to supply the treatment plant. Furthermore, there is no assessment of the volume of waste that would need to be transported to site for processing to leave a residual amount of 87,500 tonnes of waste to be used as feedstock for the plant. It is inevitable that the uncertainties involved and the comparison with current activity levels at the MRF will lead to additional traffic using Fenside Road which is wholly unsuitable for the volume and weight of the additional traffic. The further intensification of use would lead to a deterioration of the road conditions which the highways authority has inadequate funding to maintain to an acceptable standard;

(x) that additional traffic supplying waste to site will generate a likelihood of HCVs queueing to enter the site before it opens each day or parking on local roads and laybys to the detriment of highway safety, as occurred when the adjoining landfill site was operational;

(xi) that the site is located in close proximity to grade 1 agricultural land farmed intensively for the cultivation of crops upon which the nation depends for its food security. Any pollution of the surrounding land by air or water would have far-reaching consequences for the livelihood of local farmers and the health of the public;

(xii) that the Noise Impact Assessment has failed to adequately take into account the cumulative impact of the noise that would be generated from the proposed treatment plant and the permissions for the crushing of waste and operation of the adjoining MRF and fails to adequately address the concerns raised in a report commissioned from WSP by the County Council about the noise impact of the proposal. The MRF already leads to complaints from local residents of unacceptable levels of noise emanating from the site so it is inconceivable that the further intensification of use would not have an adverse impact on the quality of life of local residents;

(xiii) that the Air Quality Assessment has failed to address the concerns raised in the report by Air Quality Assessment Ltd commissioned by the County Council and that the proposed development would therefore pose unacceptable risks to human health, wildlife and the surrounding countryside from emissions to air of hazardous chemicals;

(xiv) that the Carbon Assessment cannot be relied upon and should be discounted as it fails to compare the use of green energy such as solar or wind to power the proposed

treatment plant as opposed to fossil fuel and also does not take into account the impact of decommissioning the plant after 20 years.

(xv) that the plant and particularly the 44 metres high stack will represent a visually prominent and intrusive feature in the local landscape which is totally out of character with the neighbouring fen environment. The application also fails to address the issue of power transmission off site from surplus capacity and whether this will involve additional surface power lines. No mention is made of the visual impact of emissions from the stack itself which will affect its impact on the landscape. The Landscape and Visual Impact Assessment fails to address the concerns raised in the report by Greater Cambridge Shared Planning commissioned by the County Council;

(xvi) that no evidence has been submitted to justify the assumptions of power generation on Site nor the power required to operate the treatment plant itself which appears excessive. This calls into question the various assumptions made about the amount of surplus energy to be generated and its use to power 21,000 homes and the claimed contribution to national energy security;

(xvii) that the proposed operation of the Site on a continuous basis throughout the year with the exception of a two week close down for maintenance will represent an intolerable intrusion into the quality of life of local residents from emissions, noise, odours and dust emanating from the Site;

(xviii) that approval of the application would establish a precedent which would make it difficult for the planning authority to reject potential future applications for an extension of the operational hours or the capacity of the MRF, an increase in capacity of the proposed treatment plant, the importation of waste from suppliers other than Woodford MRF or an extension in the suggested lifespan of the operation.

- 6.28 May 2025 submissions and reduction in height of the boiler building do not overcome objections. The great crested newt mitigation measures are outside the application area and not secured by a binding agreement.

Wistow Parish Council – Object

- 6.29 Traffic to or from the A1(M) at Sawtry may use the direct route through Wistow so restrictions on vehicle routing must be in place. Risk of odour and atmospheric pollution from prevailing wind from the east towards Wistow with harm to public. Object until the parish council is satisfied that Wistow will not be affected by smells or other pollution from the incinerator. Local biodiversity between Wistow and Warboys should be protected, especially Wistow Fen. There will be another incinerator at Woodhurst.

Ramsey Town Council - Object

- 6.30 Many of the perceived outcomes of the proposed development impact on Warboys Parish and not directly on Ramsey. Many of the objections put forward by Warboys Parish Council are relevant and need addressing and therefore support Warboys in their objection.

## Bury Parish Council – Object

- 6.31 Object on grounds of visual impact and the view from Bury towards Wistow and Warboys woods; pollution of air and water affecting farmland and public health; noise, dust and odours affecting nearby residents and wildlife; increased HGV traffic on unsuitable Fenside Road; planning status of the Site in relation to the landfill site; need not demonstrated; could result in importation of waste to Cambridgeshire contrary to the principles of the local plan. Proposals for more homes in the area will bring more people closer to the plant. Agree with neighbouring parishes.

## Pidley-cum-Fenton Parish Council - Support

- 6.32 Concerned about the height and visibility of the stack but support the application provide a routeing agreement is in place to ensure lorries don't come through the village. The parish council has applied for a 7.5 tonne weight limit through the village.
- 6.33 Campaign to Protect Rural England (CPRE) - No comments received.
- 6.34 British Horse Society - No comments received.
- 6.35 Warboys Landfill Action Group - No comments received.

## 7. Representations

- 7.1 Representations have been received from 60 individuals and UKWIN (UK Without Incineration), all objecting to and raising concerns about the proposed development. The points raised are summarised in paragraphs 7.2 to 7.11 below. A copy of the full representations will be shared with members of Planning Committee one week before the meeting. Representations have been received from Ben Obese-Jecty, MP for Huntingdon and from County Councillor Ross Martin (Warboys and The Stukeleys) and Huntingdonshire District Councillor Charlotte Lowe (Warboys ward). These are summarised in paragraphs 7.12 to 7.14 below and may be read in full on the Council's public access planning webpages.

### Need and source of RDF

- 7.2 Applicant has not demonstrated need  
Unlikely to be able to source from 45km radius catchment area  
Long term contracts with councils to supply minimum quantity of waste would deter recycling  
Will be in competition with much larger Wisbech and Bedford incinerators  
EfW plants are proposed in Bedford, Essex and Leicestershire  
No justification in this location – 4 times more waste is imported into Cambridgeshire than is exported  
Not close to source of waste  
No definition of RDF – could be toxic  
Should be located in a main settlement/industrial area with a good road network and away from residential and agricultural properties

## Climate change

- 7.3 CO2 savings based on assumption that all treated household waste would otherwise go to landfill  
Creation of RDF requires energy  
Lack of carbon capture; the Environment Agency has guidelines on this  
Does not take into account of machinery used outside the buildings, vehicles used to remove the ash, construction of the plant itself, energy used in the processes and offices or production of cyclopentane  
Removal of hedge and mature trees on northern boundary – replacements will take many years to be effective in removing CO2  
Fewer transport miles to landfill sites compared with EfW plants of which there are fewer  
Burning household waste is dirtier than burning coal in terms of production of greenhouse gases

## Visual impact and the countryside

- 7.4 44 metre high chimney nearly twice as high as previously approved one  
Not in keeping with the natural Claylands/ Fenlands border landscape; the restored landfill site is an artificial hill  
New building and chimney will dwarf neighbouring commercial and residential properties  
Will affect views of the countryside  
Red Tile wind farm will be removed within 5 years so comparison with proposed chimney of limited value  
Views from properties on Fenside Road and First Turf Fen Drove were not included in the LVIA

## Air pollution

- 7.5 No reference to negative pressure within the buildings  
Modelling takes no account of existing gas engines – a second source of potential pollution  
Huntingdon Crematorium not taken into account  
Gases from hazardous waste in the landfill not taken into account  
Level of harmful substances at closest properties  
Emissions from HGVs especially ultra-fine particles harmful to health  
Not possible to eliminate air pollution and particulate matter – danger to health particularly those with pre-existing conditions  
Contrary to Government's clean air agenda  
Any breach of emission limits will be too late  
When wind to northeast will affect Warboys village including the school 1400 metres away and new houses that HDC granted permission to be built  
Local temperature inversion exacerbates effects  
Area experiences more winds from the north affecting the village more  
Any increase in NO2 and SO2 levels should be avoided even if 'not significant'  
Proposed filtration of toxic gases may not be effective  
Cumulative impact with Envar incinerator  
What is the composition of the ash?  
The chimney needs to be taller because of the relative height of the village and the average others being 70 metres

Air pollution of agricultural land - impact on crops and livestock and ingestion as food  
Dust especially from ash  
Odour

#### Traffic and highways

- 7.6 Increase (x5) in lorry traffic on Fenside Road and Puddock Road  
Further damage to Fenside Road and roads through village by HGVs  
Conflict with other business including agricultural users of Fenside Road  
Conflict with pedestrians, cyclists and horse riders using Fenside Road inhibiting recreational use which is good for well-being  
The traffic would be for longer hours than Woodford are permitted  
New jobs will cause more traffic on Station Road which is already affected by new housing development and noise from traffic within the village  
Spillage from HGVs  
Junction is dangerous especially when HGVs turn right from Fenside Road onto the A141  
Cumulative construction impact with housing development on Station Road  
Queuing to enter the Site before it opens and parking on local roads or in laybys

#### Nature conservation

- 7.7 Impact of noise and emissions from HGVs on wildlife in nature reserve  
Pollution of watercourses would affect wildlife  
No account taken of hedgehogs or badgers within 1km of the Site  
Loss of habitat units on the Site, especially the 3 ponds containing great crested newts  
Proposed compensatory hedgerow habitat units would take long-term commitment  
Within 2km of SSSI, ancient woodland, nature reserves and fenland; with Warboys Wood, Wistow Wood and Pingle Wood within 500 metres; will be affected by emissions  
Impact of lighting on wildlife

#### Noise and light

- 7.8 No acoustic cladding  
Noise from Woodford site already excessive  
24/7 working  
Waste deliveries 07:00 – 19:00 weekdays and 07:00 – 13:00 Saturdays  
Acoustic fence not high enough compared with sources of noise and should be around whole Site  
Assessment has not taken into account Woodford's proposal for crushing waste or processing waste to create the RDF feedstock  
Light pollution - increase on what already experienced from Woodford MRF

#### Increased flood risk and water pollution

- 7.9 Garden and adjoining fields flooded 10 March 2023 – alleged to be from silted up pipes from Woodford  
Additional surface water run-off and foul water to be managed  
Pollution of agricultural land from water - impact on crops and livestock and ingestion as food

## Miscellaneous

- 7.10 Location of house not accurately represented in application documents  
Live electricity supply cable beneath line of former railway  
Risk from storing highly inflammable cyclopentane and lack of information on firefighting equipment  
Not all the moisture content has been accounted for which will be hazardous and transported off site with risk of spillage  
Re-grading the incinerator Site and BNG offsetting on the landfill site could disturb the integrity of the landfill site  
Will attract flies  
Will adversely affect local businesses because people will not want to live and visitors will avoid the area  
Increase in health problems will impact on the NHS

Not relevant or material to planning

- 7.11 Errors and inconsistencies in application documents  
Woodford proposal to crush concrete  
Number of planning applications for the site within 4 years  
Applicant and agent's lack of experience in building such a facility  
Too many documents for general public to read  
Lack of pre-application engagement with the community

Ben Obese-Jecty MP

- 7.12 Strongly objects on grounds of lack of need, impact on air quality, ecology and flood risk and cumulative impacts with Envar proposal at Woodhurst.

Cllr Ross Martin

- 7.13 Objects because it is contrary to adopted planning policies and because of its cumulative environmental, ecological, carbon and social impacts. The application:
- fails the sequential site test under Policy 4
  - undermines climate commitments under Policy 18 and the NPPF
  - harms designated ecological assets, with no mitigation or compensation contrary to Policy 20 and the Habitats Regulations
  - fails to secure enforceable BNG or GCN mitigation
  - jeopardises future planning processes
  - presents public health and air quality risks
  - lacks robust justification of transport and construction impacts.

Cllr Charlotte Lowe

- 7.5 Objects because it poses too many risks to the environment and health and doesn't meet planning policy:
- should be built in or near a large urban area
  - would increase traffic on unsuitable roads
  - damage to SSSIs, loss of great crested newt habitat
  - cost to the IDB of surface water management

- risk to public health from emissions to air
- carbon calculations not robust
- and lack of need.

## 8. Planning Policy

8.1 Section 70(2) of the Town and Country Planning Act 1990 states that “in dealing with an application for planning permission the authority shall have regard to the provisions of the development plan, so far as material to the application and any other material considerations.” Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that “if regard is to be had to the development plan for the purpose of any determination to be made under the planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise.” The development plan comprises the Cambridgeshire and Peterborough Minerals and Waste Local Plan (adopted July 2021) and the Huntingdonshire Local Plan to 2036 (adopted May 2019). The relevant development plan policies are listed in paragraphs 8.15 and 8.16 below.

### National policy context

- 8.2 There is a raft of legislation, policy and targets aimed at delivering more sustainable waste management and protect the environment. These include European Union (EU) legislation such as the Industrial Emissions Directive 2010/75/EU and revised Waste Framework Directive 2008/98/EC which have been transposed into English legislation through the Waste (England and Wales) Regulations 2011, as well as national policy on waste as set out within the Waste Management Plan for England (2021). The EU Withdrawal Act 2018 maintains established environmental principles and ensures that existing EU environmental law continues to have effect in UK law, including the Industrial Emissions Directive (IED) and BAT (Best Available Techniques) Conclusion Implementing Decision made under it. Elements of the Environment Act 2021 have come into force including Part 1: Environmental governance. This includes the requirement for a long term target to be set in the following priority areas: air quality, water, biodiversity and resource efficiency and waste reduction. Most of Part 3: Waste and resource efficiency is in force.
- 8.3 Defra’s Energy from Waste Guide (2014) sets out guidance on the delivery of energy from waste facilities. It highlights key environmental, technical and economic issues to raise the level of understanding and encourage debate around energy from waste. The guide provides clear support for the further expansion of energy from waste to manage waste which cannot be recycled. Renewable energy is generally defined as being from natural sources that are replenished at a higher rate than they are consumed e.g. solar, wind, some biomass. Mixed residual waste will contain a mixture of things and only the energy generated from the recently grown materials in the mixture is considered renewable. Energy from residual waste is therefore a partially renewable energy source and considered by the Government to be a source of low carbon energy.
- 8.4 The Waste Management Plan for England (2021) and its associated documents, together with local authorities’ waste local plans (such as the Cambridgeshire and Peterborough Minerals and Waste Local Plan) ensure that waste management plans are in place for the whole of the UK. It focuses on waste arisings and their management. It is a high-level, non-site specific document, providing an analysis of the current waste management

situation in England explaining how the Plan supports implementation of the Waste (England and Wales) Regulations 2011. It sets out the Government's ambition to work towards a more sustainable and efficient approach to resource use and management.

- 8.5 Paragraph 5 of the National Planning Policy Framework (December 2024) (NPPF) states that "National policy statements form part of the overall framework of national planning policy, and may be a material consideration in preparing plans and making decisions on planning applications." Although there are National Policy Statements for Energy (EN-1) and Renewable Energy Infrastructure (EN-3) they primarily apply to Nationally Significant Infrastructure Projects (NSIP) which are determined by the Planning Inspectorate on behalf of the Secretary of State. Thermeco's proposal is well below the threshold for being an NSIP and as such limited weight should be given to the national policy statements in this context. The NPPF is the principal national planning policy for determining planning applications made to planning authorities.
- 8.6 Residual waste is the waste left over when all the recycling possible has been done. The Government published a 'Residual waste infrastructure capacity note' on 30 December 2024 which presents evidence and analysis of municipal residual waste arisings and infrastructure capacity in England from 2020 to 2035. It is intended "to support decision makers in planning for residual waste treatment to support the transition to a circular economy." Together with the accompanying Ministerial Press Release and Statement it represents the Government's position on residual waste capacity and was regarded as an important material consideration by a planning inspector in his decision to allow an appeal for an energy from waste plant in Derbyshire (Appeal Ref: APP/U1050/W/24/3354670).

#### Proximity principle

- 8.7 The principle of self-sufficiency and proximity is set out in paragraph 4 of Part 1 of Schedule 1 to the Waste (England and Wales) Regulations 2011. This is within the context of the requirement to establish an integrated and adequate network of waste disposal installations for recovery of mixed municipal waste collected from private households and waste from other producers. The network must enable waste to be disposed of in one of the nearest appropriate installations, by means of the most appropriate methods and technologies, in order to ensure a high level of protection for the environment and public health. The network must be designed to enable the UK to move towards self-sufficiency in waste disposal and the recovery of mixed municipal waste from households taking into account geographical circumstances and/or the need for specialised installations for certain types of waste.

#### Waste hierarchy

- 8.8 In England, the waste hierarchy is both a guide to sustainable waste management and a legal requirement, enshrined in law through the Waste (England and Wales) Regulations 2011. The waste hierarchy, which ranks options for waste management, has driven progress in resource efficiency. Priority goes to preventing the creation of waste in the first place, followed by preparing waste for reuse, then recycling, and then recovery including by incineration where there is energy recovery. Disposal – in landfill for example or incineration without energy recovery – is regarded as the worst option.

8.9 The 2011 Regulations require everyone involved in waste management and waste producers in England (and Wales) to, on the transfer of waste, take all reasonable measures to apply the priority order in the waste hierarchy. There are exceptions for specific waste streams to depart from the priority order provided that this is justified by lifecycle thinking on the overall effects of generating and managing the waste. Regulators under the Environmental Permitting (England and Wales) Regulations 2016 must exercise their relevant functions (such as granting environmental permits) for the purpose of ensuring that the waste hierarchy is applied to the generation of waste by a waste operation.

#### National Planning Policy Framework (December 2024) (the NPPF)

8.10 The NPPF sets out the Government’s planning policies and how these are expected to be applied. At its heart is a presumption in favour of sustainable development. Paragraph 11 states that:

“For decision-taking this means:

- c) approving development proposals that accord with an up-to-date development plan without delay; or
- d) where there are no relevant development plan policies, or the policies which are most relevant for determining the application are out of date, granting permission unless:
  - i) the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for refusing the development proposed; or
  - ii) any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies of this Framework taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination.”

8.11 Paragraphs 2 and 48 of the NPPF remind us that “Planning law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise.” Paragraph 8 sets out three interdependent overarching objectives of the planning system to achieve sustainable development: economic, social and environmental. Other paragraphs of the NPPF considered to be relevant to the proposal are listed below and set out in full in Appendix 1.

Paragraphs 7 & 8	Achieving sustainable development
Paragraph 39	Decision-making
Paragraph 85	Building a strong, competitive economy
Paragraphs 88	Supporting a prosperous rural economy
Paragraphs 109, 110, 115 – 118	Promoting sustainable transport
Paragraphs 131, 135, 139	Achieving well-designed and beautiful places
Paragraphs 161, 164 & 166	Planning for climate change
Paragraphs 181 & 182	Planning and flood risk
Paragraph 187	Conserving and enhancing the natural environment
Paragraph 193	Habitats and biodiversity
Paragraphs 196, 198, 199 & 201	Ground conditions and pollution

Paragraphs 207, 216 & 218      Conserving and enhancing the historic environment

8.12 Paragraph 4 states that the NPPF should be read in conjunction with the Government's planning policy for waste, the National Planning Policy for Waste.

National Planning Policy for Waste (October 2014) (the NPPW)

8.13 Paragraph 1 of the NPPW includes and identifies the following as key components in delivering the country's waste ambitions through:

- delivery of sustainable development and resource efficiency, including provision of modern infrastructure, local employment opportunities and wider climate change benefits, by driving waste management up the waste hierarchy;
- ensuring that waste management is considered alongside other spatial planning concerns, such as housing and transport, recognising the positive contribution that waste management can make to the development of sustainable communities;
- providing a framework in which communities and businesses are engaged with and take more responsibility for their own waste, including by enabling waste to be disposed of or, in the case of mixed municipal waste from households, recovered, in line with the proximity principle;
- helping to secure the re-use, recovery or disposal of waste without endangering human health and without harming the environment; and
- ensuring the design and layout of new residential and commercial development and other infrastructure (such as safe and reliable transport links) complements sustainable waste management, including the provision of appropriate storage and segregation facilities to facilitate high quality collections of waste.

Paragraph 7 states that "When determining planning applications, waste planning authorities should:

- only expect applicants to demonstrate the quantitative or market need for new or enhanced waste management facilities where proposals are not consistent with an up-to-date Local Plan. In such cases, waste planning authorities should consider the extent to which the capacity of existing operational facilities would satisfy any identified need;
- recognise that proposals for waste management facilities such as incinerators that cut across up-to-date Local Plans reflecting the vision and aspiration of local communities can give rise to justifiable frustration, and expect applicants to demonstrate that waste disposal facilities not in line with the Local Plan, will not undermine the objectives of the Local Plan through prejudicing movement up the waste hierarchy;
- consider the likely impact on the local environment and on amenity against the criteria set out in Appendix B and the locational implications of any advice on health from the relevant health bodies. Waste planning authorities should avoid carrying out their own detailed assessment of epidemiological and other health studies;
- ensure that waste management facilities in themselves are well-designed, so that they contribute positively to the character and quality of the area in which they are located;
- concern themselves with implementing the planning strategy in the Local Plan and not

with the control of processes which are a matter for the pollution control authorities. Waste planning authorities should work on the assumption that the relevant pollution control regime will be properly applied and enforced;

- ensure that land raising or landfill sites are restored to beneficial after uses at the earliest opportunity and to high environmental standards through the application of appropriate conditions where necessary.

8.14 Appendix B of the NPPW states that in determining planning applications, waste planning authorities should consider the following factors:

- a. protection of water quality and resources and flood risk management
- b. land instability
- c. landscape and visual impacts
- d. nature conservation
- e. conserving the historic environment
- f. traffic and access
- g. air emissions, including dust
- h. odours
- i. vermin and birds
- j. noise, light and vibration
- k. litter
- l. potential land use conflict

Where relevant to the current proposal, these matters are covered later in this report.

The development plan

8.15 The following policies of the Cambridgeshire and Peterborough Minerals and Waste Local Plan (July 2021) (MWLP) are considered to be relevant to this proposal.

Policy 1	Sustainable Development and Climate Change
Policy 3	Waste Management Needs
Policy 4	Providing for Waste Management
Policy 10	Waste Management Areas (WMAS)
Policy 16	Consultation Areas (CAS)
Policy 17	Design
Policy 18	Amenity Considerations
Policy 20	Biodiversity and Geodiversity
Policy 21	The Historic Environment
Policy 22	Flood and Water Management
Policy 23	Traffic, Highways and Rights of Way
Policy 25	Aerodrome Safeguarding
Appendix 3	The Location and Design of Waste Management Facilities

8.16 Relevant policies in Huntingdonshire's Local Plan to 2036 (May 2019) (HLP)

Policy LP2	Strategy for Development
Policy LP5	Flood risk
Policy LP8	Key Service Centres

Policy LP10 The Countryside  
Policy LP11 Design Context  
Policy LP12 Design Implementation  
Policy LP14 Amenity  
Policy LP15 Surface Water  
Policy LP16 Sustainable Travel  
Policy LP17 Parking Provision and Vehicle Movement  
Policy LP19 Rural Economy  
Policy LP29 Health Impact Assessment  
Policy LP30 Biodiversity and Geodiversity  
Policy LP31 Trees, Woodland, Hedges and Hedgerows  
Policy LP34 Heritage Assets and their Settings  
Policy LP35 Renewable and Low Carbon Energy  
Policy LP36 Air Quality  
Policy LP37 Ground contamination and groundwater pollution

8.17 The following Supplementary Planning Documents (SPD) are relevant:

Cambridgeshire Flood and Water SPD (July 2016);  
Huntingdonshire Landscape and Townscape SPD (March 2022)

## 9. Planning Considerations

Principle and location of the proposed development

Relevant policies: NPPF paragraphs 85 and 88  
MWLP policies 1, 3, 4, & 16  
HLP policies LP2, LP8, LP10, LP19 & LP35

9.1 The purpose of the proposed development is to use the non-recyclable fraction of non-hazardous waste to generate electricity. The principle of recovering energy from waste would contribute towards addressing climate change and is supported by national and development planning policies. HLP policy LP35 supports renewable or low carbon (non-wind) energy generating schemes provided “all potential adverse impacts including cumulative impacts are or can be made acceptable”. Energy from waste (EfW) is a type of recovery which is below prevention, preparing for re-use and recycling but above disposal in the waste hierarchy as shown in Appendix A of the NPPW. As set out in paragraph 8.3 above, the Government expects EfW to contribute to meeting the UK’s energy needs. It is considered that the proposed development insofar as it is treating waste that would otherwise be disposed of by landfill, would be consistent with the Government’s position on EfW and the policy aims of the NPPF in promoting sustainable development and the generation of low carbon energy.

9.2 NPPF paragraph 85 supports the investment in, expansion and adaptation of businesses and paragraph 88 states that “Planning policies and decisions should enable: a) the sustainable growth and expansion of all types of business in rural areas, both through the conversion of existing buildings and well-designed, new

buildings.” One of the strategies for development in HLP policy LP2 is to “Support a thriving rural economy”.

9.3 MWLP Policy 1: Sustainable Development and Climate Change, states that “Mineral and waste management proposals will be assessed against the overarching principle of whether the proposal would play an active role in guiding development towards sustainable solutions.” The policy requires that an applicant should also set out how this will be achieved such as:

“(a) demonstrating how the location, design, site operation and transportation related to the development will help to reduce greenhouse gas emissions (including through the adoption of emission reduction measures based on the principles of the energy hierarchy); and take into account any significant impacts on human health and wellbeing and on air quality;

(b) where relevant, setting out how the proposal will make use of renewable energy including opportunities for generating energy from waste for use beyond the site itself, and the use of decentralised and renewable or low carbon energy; ...[(c) not relevant]

(d) for waste management proposals, (i) how the principles of the waste hierarchy have been considered and addressed; and (ii) broadly quantifying the reduction in carbon dioxide and other relevant greenhouse gases e.g. methane that should be achieved as part of the proposal, and how this will be monitored and addressed in future.”

9.4 Location, transportation and the waste hierarchy are discussed later in this report. The development would generate low carbon energy (electricity) which would be used on the Site itself with the remainder exported to the grid for use off site. The office building would have solar panels giving a source of renewable energy. The applicant has provided a carbon assessment which gives the net carbon impact of the plant over its 20 year lifetime including the construction phase impact and after deducting the emissions offset from electricity generation with the net impact calculated to be 539,370 tCO<sub>2</sub>e. The emissions from sending the same waste to landfill are estimated by the applicant to be 541,557 tCO<sub>2</sub>e after deducting emissions offset by electricity generation from combustion of landfill gas. The estimated net saving from this proposal, compared to landfill, is very small. However, there are many uncertainties such as the biogenic composition of the waste and rate of landfill gas capture. The applicant’s methodology has been challenged by the CCC Economy and Climate team who consider that the benefit of emissions offset from electricity generation is likely to be smaller than claimed.

9.5 MWLP Policy 1 criteria (e) to (i) relate to climate change resilience such as sustainable drainage and flood risk and will, where relevant, be addressed later in this report. The principle of the proposed development would be consistent with the broad policy aims of supporting low carbon energy generation. However, it is considered that the precise quantity of carbon benefits of the proposal should carry little weight because the broad policy support is dependent on the proposed development not having significant impacts on human health and well-being and air quality (amongst other things). These matters will be considered later in this report, as will whether carrying out the development would comply with planning policy in

respect of need and location and, if it does, whether any adverse impacts would be significant enough to outweigh the benefits of using waste to generate energy.

### Waste Management Needs - MWLP Policy 3

9.6 MWLP Policy 3 deals with the need for waste management and Policy 3 states that:

“The net capacity figures in the table above are not ceilings for recycling, treatment or recovery of waste. As such, proposals will, in principle (and provided they are in accordance with Policy 4: Providing for Waste Management), be supported if any of the following scenarios apply:

- (a) it would assist in closing a gap identified in the table, provided such a gap has not already been demonstrably closed; or
- (b) it would assist in closing a new gap identified in the future, with such identification to be set out in the annual monitoring of the Plan; or
- (c) it moves waste capacity already identified in the above table up the waste hierarchy.”

#### Scenario (a) – a capacity gap

9.7 Under the heading for the Treatment and energy recovery processes (AD, energy from waste and other physical /chemical treatment processes) in the table of waste management needs in Policy 3 there are forecasts for the amount of Mixed – Municipal, Commercial and Industrial (C&I) waste arising in Cambridgeshire and Peterborough: these are 226,000 tpa in 2021, rising to 416,000 tpa in 2036. The table looks at existing operational capacity (what waste management facilities are in place) and in 2021 the forecast was a capacity surplus of 124,000 tpa. By 2031 the capacity gap would become 57,000 tpa and by 2036 80,000 tpa. Taking into account waste sites that have planning permission but are not operational, there would be a capacity surplus for the entire plan period (until 2036). The Peterborough Green Energy Ltd (PGEL) Energy from Waste scheme has been permitted but is not operational and therefore the applicant considers that MWLP Policy 3 scenario (a) is met because the 57,000 tpa and 80,000 tpa capacity gap would not be closed by that scheme. This is accepted because although PGEL received planning permission in 2009 and has been implemented to keep it ‘live,’ it now seems unlikely that it will be constructed.

9.8 In February 2024 a Development Consent Order (DCO) for the Medworth Energy from Waste Combined Heat and Power Facility was granted for this facility in Wisbech which will have a throughput of 625,000 tpa residual non-hazardous waste. Requirement 29 of the DCO (similar to planning conditions) puts restrictions on the waste catchment area for the facility to ensure the proximity principle is applied. The Waste Area Plan for the DCO states that 17.5% (approx. 109,000 tpa) must be sourced from within 75 km of the facility, with 80% of the total (625,000tpa) waste from an area which includes all of the East of England, most of the East Midlands and some of the West Midlands. Thermeco’s proposal and the Medworth facility have overlapping market areas, and there is no restriction preventing Medworth obtaining their feedstock of waste from the same sources that Thermeco wishes to pursue. Medworth has both a larger catchment area than Thermeco

proposes but also a requirement to take 109,0000 tpa of waste from a similar catchment area as the proposed Thermeco facility.

9.9 On the basis of the above, whether this proposal complies with scenario (a) depends on whether the capacity gap has demonstrably been closed. All the requirements of the Medworth DCO that are necessary for development to commence have been discharged and the developer, MVV Environment Ltd (MVV), has under the terms of the S106 agreement formally notified CCC that they anticipate commencing development during the week beginning 22 September 2025. At the meeting of the Operator Liaison Group on 5 June 2025 MVV stated they anticipate that the facility will be fully operational by the middle of 2029 and that they had already contracted 50 – 60% of their waste supply. When assessing waste needs as part of the preparation of Local Plan, the likelihood of a facility coming online during the lifetime of the Plan and its capacity are taken into account. It is considered highly likely that the Medworth facility will be built and operational by 2029 and is likely to close the capacity gap by 2031 meaning the Thermeco facility cannot meet Scenario (a).

9.10 Scenario (b) is not relevant.

Scenario (c) - moving waste up the waste hierarchy

9.11 A proposal would meet scenario (c) if it moves waste capacity identified in the table up the waste hierarchy. The table in Policy 3 refers the scenario to capacity within Cambridgeshire and Peterborough and the available tonnage of waste becomes relevant. It is necessary to consider how much of the waste the Thermeco facility could receive and if it would move up the waste hierarchy - for example a waste recycling facility moves waste further up the hierarchy than a waste recovery facility.

9.12 Energy from waste is a form of recovery because the waste becomes fuel to generate electricity. The applicant states that the facility would treat waste that would otherwise be landfilled (disposal) so moves it up the waste hierarchy.

9.13 The proposal is that all the 87,500 tpa feedstock for this facility would be obtained from the Woodford MRF which is limited by condition 20 of planning permission CCC/22/53/VAR to accepting waste from “the administrative areas of Cambridgeshire and Peterborough or a 45 kilometre radius of the site, whichever is the greater”. To comply with Policy 3 scenario (c) waste from within the Cambridgeshire and Peterborough area that would otherwise be landfilled would need to be moved up the waste hierarchy. Waste from within the 45 km radius of the Woodford MRF but outside Cambridgeshire and Peterborough Plan Area that would otherwise be landfilled would not meet scenario (c).

9.14 The applicant submitted a Waste Availability Report (WAR) which seeks to demonstrate that there is adequate waste available to fuel the facility. A market area of 45 km is identified, based on the catchment area of the Woodford MRF. The WAR is based on Environment Agency Waste Data Interrogator (WDI) 2022 (Waste Removed) data. The WDI is based on administrative areas, some of which fall partially within and partially outside the 45 km catchment area of the Woodford

MRF. The WAR concludes that 461,358 tonnes of suitable waste was sent to landfill from the administrative areas within their market area but it is unclear whether the report is based on the upper or lower tier authority areas (i.e. County or District Councils). In both cases the figures will be exaggerated because they include Bedford, North Northamptonshire, Norfolk, Lincolnshire and Suffolk which are beyond the 45 km limit. The WAR has not quantified the amount of waste arising from the catchment area, but from a much wider area of search. The WAR does not demonstrate that sufficient waste arises in the 45 km catchment area of Woodford MRF. However, based on the available data and the Table in Policy 3, the core argument that sufficient waste presently exists is justified, albeit not to the extent that that the applicant presents.

- 9.15 The WAR also states that 640,000 tonnes of local authority (mainly municipal) waste was sent to landfill in 2022/23; this represents approximately 23% of the total waste managed by the authorities in the eastern region (from DEFRA Waste Data Flow). It is again unclear whether the report is based on the upper or lower tier authority areas and the WPA's research suggests that the upper tier authority areas were used to arrive at the 640,000 tonnes figure. During 2020-21 Cambridgeshire sent 103,158 tonnes of waste to landfill and Peterborough sent 173 tonnes. More than half of the Eastern region's total of 644,974 tonnes of waste to landfill in 2020-21 was from Essex. The Government's 'Residual waste infrastructure capacity note' (30 December 2024) identifies Cambridgeshire and Essex within a list of the 7 local authorities that sent more than 40% of their residual waste to landfill 2022-23 (Essex 95% and Cambridgeshire 87%).
- 9.16 To comply with MWLP Policy 3 scenario (c) the Thermeco facility would need to move waste arising that is accounted for in the table up the waste hierarchy by diverting it from landfill. Although, based on 2020-21 figures, there is likely to be around 103,000 tpa of waste which could potentially be used by Thermeco, and they would be competing with Medworth for the same waste in the same market. The proximity principle states that waste should be managed at one of the nearest facilities, and therefore the consideration of the sustainability of the distance that waste will travel, if both facilities are constructed, is a consideration.
- 9.17 Thermeco have also submitted letters from Thalia Waste Management Ltd, Westbrook Waste Ltd and Woodford Recycling seeking to demonstrate the availability of a suitable type and quantity of waste.
- 9.18 Thalia operates a waste recycling and landfill site at Waterbeach and other waste recycling sites within Cambridgeshire as well as sites in Milton Keynes (and elsewhere in the UK), processing approximately 800,000 tpa. Thalia state that if this proposal is approved "Thalia Waste Management has the potential to deliver a proportion of the residual waste required across our portfolio of waste management services. This would be in keeping with our strategy to eradicate the need to use landfill for disposing of waste materials, as well as seeking to move waste that we manage up the hierarchy from disposal to recovery."
- 9.19 Westbrook Waste have a contract with Thalia via their Cambridgeshire County Council management contract to dispose of their waste materials and state that they intend to supply 100% of the RDF feedstock required by the proposed

Thermeco facility. Although Westbrook Waste state that Thalia are landfilling 300,000 tonnes of waste per annum that they have agreed to recycle at the Woodford Recycling's site, CCC's Head of Waste Management clarified that only 120,000 tpa of 'black bag' waste is handled by Thalia, with most landfilled and a small amount going to an energy from waste plant in Bedfordshire.

9.20 Woodford Recycling have stated their "ability and intention to supply 100% of the feedstock required" and the planning application was amended in September 2024 to state that Thermeco would only source feedstock from Woodford Recycling. However, the letter also states that "Our operational permit and processing building will ensure that we can provide the majority of the required feedstock at our existing facility as per a supply contract to your thermal treatment plant." This is not consistent with the statement that they will supply 100% of the feedstock. Woodford's planning permission (CCC/22/053/VAR - Materials recycling facility, offices and ancillary development) allows them to process up to 160,000 tpa waste. According to the Environment Agency, WDI Woodford's annual throughput since 2019 has been between 20,000 and 30,000 tpa, of mostly inert C&D waste which is what would be expected from a skip business. Provided that Woodford's operations comply with the conditions in planning permission CCC/22/053/VAR (including the waste catchment area) they would be able to accept residual non-hazardous waste and produce RDF.

9.21 Supporting text in paragraph 3.41 of the MWLP states:

"However, the Plan's indicative capacity needs do not form a ceiling; where justified and in line with the wider aims and policies of this plan the Councils would be supportive of opportunities for additional capacity to be approved for a range of waste management methods where this will drive waste up the waste management hierarchy".

This suggests that the provision of excess recycling and recovery capacity may be supported if it is justified and be in line with the wider aims of the MWLP. Paragraph 3.42 states

"...Government policy focuses the proximity principle more towards the disposal of waste and recovery of mixed municipal waste. For these, and other waste types, the intention is for the Plan to include the preference for waste development to support sustainable waste management principles, including the proximity principle. This also links through to supporting sustainable transport movements."

9.22 As set out above, the Medworth EfW facility is very likely to begin construction this year and, once operational, would close the capacity gap for the treatment and energy recovery from waste by 2031. The Thermeco facility would provide additional and possibly excess recovery capacity and, because of catchment area restrictions, would be competing with Medworth for Cambridgeshire's waste that would otherwise go to landfill.

9.23 If there is excess capacity in the Plan area, this would result in either:  
i) unused capacity (more likely where there is a lack of suitable material for recycling); or

ii) importation of waste from outside the Plan area (more likely in the case where there is waste material available elsewhere).

- 9.24 Excess capacity runs counter the proximity principle. If the Thermeco facility could source material from within its (the Woodford MRF's) catchment area then it would move waste that would otherwise be landfilled up the waste hierarchy. It would also have the net effect of displacing the capacity of the Medworth facility, which would need to source waste from further afield. In the event that the Thermeco facility couldn't source all feedstock from within its catchment area the facility could not operate as proposed i.e. sourcing all its feedstock from the Woodford MRF.

### Conclusions on MWLP Policy 3

- 9.25 In principle, the proposed development would move waste that would otherwise be landfilled, up the waste hierarchy and make a contribution to the generation of renewable energy. If permission is granted, the proposed facility would provide capacity to recover waste that would otherwise go to landfill by providing an alternative form of capacity that is higher in the waste hierarchy.
- 9.26 However, it is considered that the Medworth facility is likely to close the capacity gap for Treatment and energy recovery processes (Mixed – Municipal, Commercial and Industrial (C&I) identified in MWLP Policy 3 by 2031. For the reasons given in paragraphs 9.8 and 9.9 above it is considered that the proposed development would not meet MWLP Policy 3 scenario (a). The Woodford MRF may only accept waste from within the administrative areas of Cambridgeshire and Peterborough or a 45 kilometre radius of the site, limiting the potential sources of waste from which to create RDF for the proposed Thermeco facility. If the Thermeco facility were to be developed as well as Medworth, it is considered that there is likely to result in over-provision of energy recovery capacity in Cambridgeshire.
- 9.27 Scenario (c) requires that a proposal “moves waste capacity already identified in the above table up the waste hierarchy.” For the reasons given in paragraph 9.13 above, only waste that would otherwise be landfilled and sourced from within Cambridgeshire and Peterborough would meet scenario (c). As set out in paragraphs 9.19 – 9.20 there is uncertainty about the availability and security of supply of suitable feedstock for the proposed facility. Consequently, scenario c) cannot, with certainty, be met.
- 9.28 For the reasons given above it is also considered that the proposed facility would either: be unable to compete with Medworth for suitable waste from within their common catchment area and be unable to function as proposed; or be able to secure all its waste from within the catchment area resulting in Medworth needing to source waste from further afield which would be contrary to the proximity principle.
- 9.29 Compliance with Policy 3 is also dependent on the proposal being in accordance with Policy 4 which will be addressed in the later section in the report. In conclusion, and irrespective of compliance or not with Policy 4, it is considered that the proposed development does not accord with MWLP Policy 3. However, if the Planning Committee does not agree with officers' analysis and conclusion and

decide that that either scenario (a) or scenario (c) applies, then it would be necessary to fully assess the proposed development against Policy 4.

#### Development in the countryside

- 9.30 This section of the report considers the location of the Site in the context of the HLP which is also relevant to the consideration of the proposal under part of MWLP Policy 4, which will be covered later in the report. Paragraphs 4.80 to 4.85 of the HLP discuss what are considered to be built-up areas for the purposes of the application of policies LP7, LP8, LP9 and LP10. Warboys is defined as a Key Service Centre and policy LP8: Key Service Centres states:

##### “Development Proposals within the Built-up Area

A proposal for development on a site which is additional to those allocated in this plan will be supported where it is located within a built-up area of a Key Service Centre.

##### Development Proposals on Land well-related to the Built-up Area

A proposal for development on land well-related to the built-up area may be supported where it accords with the specific opportunities allowed for through other policies of this plan.”

- 9.31 The Site is neither within the built-up area of Warboys nor well-related to it. There is a clear separation between the houses on Coronation Avenue which form the northern edge of the village and the Site. Furthermore, the village has been developed on the plateau at around 30 metres AOD whereas the Site is located close to the foot of the restored landfill site on the Fen edge at approximately 8 metres AOD creating a clear separation of the village and the farmland to the north. It is considered therefore that the Site in planning policy terms is in the countryside and that HLP policy LP10 is relevant.
- 9.32 HLP policy LP10: The Countryside states that “Development in the countryside will be restricted to the limited and specific opportunities as provided for in other policies of this plan” which will be discussed later in this report. A key ‘other policy’ is HLP policy LP19: Rural Economy which has two limbs that relate to the expansion of existing businesses. The first supports the expansion of established businesses within their existing operational sites and the second supports the expansion of established industrial or rural businesses on land outside of their existing operational site in the open countryside where four criteria are met. The current proposal falls mostly within the area that has planning permission for waste management, with a small part outside.
- 9.33 This section of the report is to establish the status of the Site in the context of HLP policy LP19: Rural Economy. Most of the Site is identified on the MWLP Policies Map as a Waste Management Area (WMA) shown hatched in black on the extract from the MWLP in Figure 1 below. WMAs identify existing or committed waste management facilities that make a significant contribution to managing any waste stream and for that reason are protected from being compromised by inappropriate non-waste development by MWLP Policy 16. The Consultation Area (CA) referred to in condition 16 is defined by the green line with triangles on the plan below.



Figure 1

- 9.34 The WMA reflects approximately 5 hectares of land to which planning permission CCC/22/053/VAR, the Woodford MRF, relates. It includes the operational area which comprises the building, the adjacent yards and access road and the office building and car park which together cover approximately 2 hectares. The remainder is subject to a landscape plan referred to in condition 5 of planning permission CCC/22/053/VAR. The Thermeco application area is, except part of the shared access road, outside the operational area of the Woodford MRF on land that is shown on the landscape plan as being planted with trees and shrubs and grassed areas with ponds. Although Thermeco would be new to the district and to the Warboys waste management site, HDC considers that the proposal would be the expansion of an existing business outside of its existing operational site. The second limb of HLP Policy LP19 is therefore relevant and it requires four criteria to be met. HLP Policy LP19 (e) requires opportunities for the reuse of existing buildings to be explored and replacement or new build only where no suitable reuse opportunities are available. There are no opportunities to reuse buildings on the site.
- 9.35 HLP Policy LP19 (f) requires proposals to make more efficient use of land within the existing site boundary unless it is not suitable for the proposed use. There would not be sufficient land within the operational area of the MRF to accommodate the proposed development. HLP Policy LP19 (g) requires development outside an existing operational site to avoid the irreversible loss of the best and most versatile agricultural land (Grade 1 to 3a) particularly Grade 1 where possible, and to use land of lower in preference to land of higher agricultural value. HLP policy LP10 (a) and MWLP Policy 24 (Sustainable use of Soils) have similar aims. The Site has not been in agricultural use for many years being part of the railway line and station in the late nineteenth century and subsequently the brickworks. More recently part of it has been great crested newt compensation habitat. No agricultural land would be lost as a result of the proposed development.
- 9.36 HLP policy LP19 (h) requires the scale, character and siting of the proposal not to have a detrimental impact on its immediate surroundings and the wider landscape. HLP policy LP10 requires that development in the countryside must recognise the intrinsic character and beauty of the countryside. This is discussed in detail in

section 10 of this report where it is concluded that the proposed development, in particular the new buildings and stack, would not be sympathetic to the landscape and would have an adverse visual impact. For this reason, it is considered that the proposed development would not comply with all criteria of the second limb of HLP policy LP19. Policy LP10 requires development in the countryside not to give rise to noise, odour or obtrusive light or other impacts that would adversely affect the use and enjoyment of the countryside by others. These matters are discussed in detail later in this report where it is concluded that adverse impacts could be mitigated.

- 9.37 The support in principle for renewable and low carbon energy generation schemes in HLP policy LP35: Renewable and Low Carbon Energy is qualified by the need for it to be demonstrated that all potential adverse impacts are or can be made acceptable. The next sections of this report will consider the proposed development in the context of the wider policies of the development plan and the other relevant locational criteria in the NPPW Appendix B will be addressed.

#### Providing for Waste Management – MWLP Policy 4

- 9.38 MWLP Policy 4 sets out a broad spatial strategy for the location of new waste management development and states that:

“In line with Objective 2 of this Plan, the Councils aim to actively encourage and will in principle support the sustainable management of waste, which includes encouraging waste to move as far up the waste hierarchy as possible, whilst also ensuring net self-sufficiency over the Plan area. In order to ensure this aim can be met, waste management proposals must demonstrably contribute towards sustainable waste management by moving waste up the waste hierarchy; and proposals for disposal must demonstrate that the waste has been pre-treated and cannot practically be recycled. Proposals which do not comply with this strategy for waste management development must also demonstrate the quantitative need for the development.”

- 9.39 Policy 4 goes on to state that:

“Unless otherwise supported by policy provision under one of the sub-headings in the second half of this Policy, the locational strategy of this Plan is that new or extended waste management facilities should be located within the settlement boundary\* of the existing or planned main urban areas of: Cambourne, Cambridge, Chatteris, Ely, Huntingdon, Littleport, March, Northstowe, Peterborough, Ramsey, Soham, St. Ives, St. Neots, Waterbeach New Town, Whittlesey or Wisbech”

“\*a ‘settlement boundary’ is that which is defined on the relevant Policies Map for the area (e.g. a village envelope or urban area boundary). If no such boundary is identified on the Policies Map, it will constitute the edge of the built form of the settlement, or should an edge be defined in words (rather than map form) in a Local or Neighbourhood Plan, then that definition will be used in that local area.”

- 9.40 The Site is not in one of the main urban areas listed in MWLP Policy 4. As set out in paragraph 9.31 above the Site is outside any settlement which would under the HLP definition be a ‘built up area’ and in planning policy terms is a countryside

location. Having failed to meet the first part of Policy 4, the proposal needs to be assessed against any relevant subheadings in the second part. Of relevance are Waste Management Facilities – Rural Areas and Waste Management Facilities – Colocation which will be addressed in turn.

“Waste Management Facilities – Rural Areas:

Only waste management facilities which are located on a farm holding, and where the proposal is to facilitate agricultural waste recycling or recovery (the majority of which is generated by that farm holding) will, in principle, be supported. Outdoor composting proposals which require the importation of waste material will be determined in accordance with wider policies of the Development Plan.”

The current proposal would not comply with that part of Policy 4.

Co-location

9.41 Co-location is introduced in supporting text paragraph 3.49 which states:

“The benefits of co-location of waste management facilities is also acknowledged by the Councils, particularly where facilities can show why co-location would be beneficial or can complement existing waste streams e.g. where outputs of one recycling waste stream can benefit further recycling or recovery from waste that is already taken to the original waste site or where the synergies of the operations can be understood and justified; which is why a locational criteria based assessment is not required in such instances by the second half of Policy 4. For the avoidance of doubt, such benefits will need to be considered on a case-by-case basis, and the policy should not be read as a blanket approval for further waste management extensions or new sites or facilities, just because a waste site already exists in the area.”

9.42 Policy 4 states:

“Waste Management Facilities – Co-location

Opportunities to co-locate waste management facilities together, or with complementary activities, as explained within the supporting text for this policy will, in principle, be supported, particularly where relating to:

- employment sites;
- industrial estates;
- mineral extraction and processing sites (for temporary proposals for aggregate and/or inert recycling facilities associated with extraction and processing and, where benefits are demonstrated, to the restoration of a mineral site); or
- integrated waste management development that has specific links to the existing waste management operations already taking place on a site.

Proposals for co-location will not be supported if the benefits do not outweigh the harm when assessed against the wider policies of the Development Plan.”

9.43 The following tests have been drawn up to assist in assessing the proposal against the principles of co-location which are in MWLP supporting text 3.49 and set out in paragraph 9.41 above.

1. Is the proposal co-located with a waste management development that has specific links to a permitted waste management facility at the site? (i.e. located on the same site)
2. Is there a clear link and / or interdependence between the facilities?
3. Is benefit being offered by co-location in this instance? (What is this benefit and how closely is it linked to existing operations?)
4. Do the benefits offered by co-location outweigh the harm (considering all other policies of the development plan) that the proposal will cause?

#### Test 1 – Physical co-location

- 9.44 As set out in paragraph 9.38 above, most of the proposed development would take place within the area covered by the planning permission for the Woodford MRF, which is an existing permanent waste management site, and would be physically adjacent to the MRF.

#### Test 2 – Link and interdependence between facilities

- 9.45 Integrated waste management development is not explicitly defined in the MWLP but the term implies that a minimum of two processes are already being undertaken at the existing site or that a new facility would be integrated with the existing facility. Examples of co-location are where the proposed development would treat an existing green waste stream in a different way – dry anaerobic digestion instead of composting or processing a new waste stream to generate energy that would be used to power the other waste operations. These could be considered to be good examples of co-location because the new facilities were linked to the existing waste stream and/or were interdependent.
- 9.46 In applying the test of “integrated waste management development” it is necessary to understand the existing facility. The Woodford operation is currently a skip business run from a site which has planning permission to sort and process mixed waste for recycling or disposal off site. There could be some benefit for the MRF, in the form of an outlet for some of its current waste stream, but as stated in paragraph 9.20 above, little of the current skip waste would be suitable to create RDF; for the years 2019 to 2023 the site received between 800 and 1,800 tonnes of household, industrial and commercial waste which would be potentially suitable for RDF (source EA WDI). The link would be to a very small part of the existing waste management operation.
- 9.47 In order to supply the Thermeco facility with 87,500 tpa of RDF the Woodford MRF would need to accept and process 90,000 tpa of residual waste. In terms of the permitted annual throughput limit of 160,000 tpa this could be done alongside the skip waste business. New plant would need to be installed to process the new waste stream. The agreement between Woodford and the applicant, Thermeco, is a material consideration. Woodford have stated their “ability and intention to supply 100% of the feedstock required” but the applicant “reserves the right to source material directly if there is a break in supply for whatever reason.” Woodford could under the terms of its existing planning permission produce RDF for any EfW plant but according to Thermeco’s planning application does not do so because there is no outlet for it close enough to the site. The proposed EfW plant could, if the supply

from the Woodford MRF is unavailable, and in the absence of a restrictive planning condition, operate with RDF from any source.

- 9.48 It is considered that unlike the other co-located proposals where the new waste facilities would be under the control of the existing site operator and would be inter-related such that they could not operate effectively in isolation, the Thermeco proposal demonstrates very limited benefits of co-location which would be lost entirely should the agreement with Woodford break down. As set out in paragraphs 9.17 – 9.19 above, Thermeco are placing weight on Westbrook Waste obtaining CCC waste from Thalia and it being processed by Woodford. It is unlikely that this supply chain, which is dependent on 4 companies, could be within the scope of a S106 planning obligation.

Test 3 – Is benefit being offered by co-location?

- 9.49 The Thermeco proposal does not include the infrastructure for processing residual waste into RDF so needs to obtain it ready-processed from elsewhere. The Thermeco plant would be capable of using the appropriate specification of RDF from any source. The co-location benefit being offered is that the Thermeco plant would receive its feedstock from the adjacent Woodford MRF and not directly from a remote source of RDF thereby reducing transport miles. However, should the Woodford MRF not be willing or able to provide the Thermeco facility with the required RDF, this benefit would not be realised. In the worst case scenario it can be presumed that the facility itself would still operate but with RDF that had been processed and brought to the Site from elsewhere. If the Thermeco facility was not constructed the RDF it would have used would go to other facilities.

Test 4 – Do the benefits offered by co-location outweigh the harm?

- 9.50 This requires other aspects and potential impacts of the development to be assessed against the relevant policies before being attributed weight in the overall planning balance. This is covered in the overall conclusion section of this report.

Other locational factors

- 9.51 The applicant has put forward two arguments that in their view support the development on the Site which will be addressed in turn.

- i) no other sites are available; and
- ii) the Site is an existing waste management site.

Site availability

- 9.52 The applicant has submitted an Alternative Site Assessment (Leivers Consultancy Ltd 28 May 2024) (the ASA) which followed a Site Search Assessment covering the whole of the UK undertaken by Avison Young which used 7 criteria including location in relation to the feedstock market and the planning status of the Site. The ASA is intended to address the requirements of MWLP Policy 4 and applied additional site-specific criteria to alternatives to the Site. These documents are available on the public access area of our planning webpages.

Policy 4 states that:

“Where the proposed use and operations are potentially suitable within an urban setting (with suitability predominantly determined by applying policies in the Development Plan), then proposals should first consider the use of either:  
(a) employment areas (as identified in the Development Plan as being suitable for industrial and storage or distribution type uses) within the settlement boundary of the above identified urban areas; or  
(b) any ‘strategic’ employment areas over 10ha (as identified in the Development Plan as being suitable for industrial and storage or distribution type uses), which might not necessarily be located at one of the above identified urban areas.

Where such sites are demonstrated not to be available or suitable, using a proportionate amount of evidence, then support will be given, in principle, to locating facilities on other suitable sites within the urban areas identified above; or on the edge of them where it is demonstrated that the development is compatible with surrounding uses (including the physical size and throughput of the proposed development); and where there is a relationship with the settlement by virtue of landscape, design of the facility, and highway access. In applying these provisions, proposals should prioritise, and substantial weight will be given to, the use of suitable brownfield land within the above identified urban areas.”

- 9.53 The ASA included search criteria beyond those referred to in Policy 4 and set out in the paragraph above so little weight can be placed on it.

Existing waste management site

- 9.54 MWLP supporting text paragraph 3.46 introduces the potential for new waste management facilities on existing waste management sites:

“Whilst new waste management sites and facilities will be directed to the main settlements that exist in the plan area through the locational criteria of Policy 4, the Councils acknowledge that there may be instances where waste management sites or facilities that already exist outside of these main settlements may be appropriate for either:

- temporary recycling opportunities e.g. landfill sites where additional facilities linked to the life of the temporary permission could help push waste up the hierarchy; or
- alternative or additional waste management facilities within the planning permission boundary of existing permanent waste sites.

In such instances, when considering the locational criteria based assessment the Councils will, in principle, support the use of an existing waste site for new waste management facilities. However, the consideration and support in principle to such uses, including temporary uses linked to the life of an existing waste site, should not be taken as support for permanent facilities, or for an intensification of a site where the benefits do not outweigh the harm when assessed against the wider policies of the Development Plan.”

9.55 MWLP Policy 4 states:

“New waste management proposals that are unable to demonstrate benefits of co-location under part 2 of this policy, that are within the planning permission boundary of existing waste management sites (i.e. where extensions to the site area is not required) that already operate outside of the main settlements identified in the locational criteria above will, in principle, be supported. Each case will be considered on its own merits and will be assessed against all the policies within the Development Plan.”

9.56 The Woodford MRF is a permanent waste management site. Most of the Thermeco application area is within the area covered by the MRF’s planning permission CCC/22/053/VAR, shown outlined in blue on Figure 2 below. A relatively small part (11.3%) along the boundary with the Fen and shown in green is not so this part of MWLP Policy 4 is not met.



Figure 2 (from Application drawing no. D6628-IE-0003 Rev A3)

9.57 The conclusion to the second paragraph of Policy 4 states that: “Proposals which do not comply with this spatial strategy for waste management development must also demonstrate the quantitative need for the development.” The spatial strategy is Policy 4 and this requirement effectively is a broader version of Policy 3 scenarios (a) – (c). The requirement to demonstrate quantitative need is an additional requirement in scenarios where a proposal does not comply with Policy 4. A demonstration of need does not change the development not being supported by Policy 4, i.e. not being in accordance with the spatial strategy.

#### MWLP Policy 4 conclusion

9.58 The Site is not in within the settlement boundary of a main urban area and in planning policy terms is in the countryside. The proposal does not meet the criteria for waste management development in rural areas and could not take place entirely within the planning permission boundary of the existing waste management site.

Taking into account the analysis against the 4 tests set out in paragraphs 9.44 to 9.49 above it is considered that the proposal would present only small and insecure benefits of co-location. As stated in paragraph 9.50 above, these limited benefits need to be weighed against the wider policies of the development plan so it is not possible to come to a conclusion on MWLP Policy 4 in isolation.

## 10. Landscape character and visual impact

Relevant policies: NPPF paragraphs 135 and 187  
MWLP Policy 17 and Appendix 3  
HLP policies LP10, LP11, LP12, LP19, LP31 & LP35

10.1 NPPF paragraph 135(c) states that “Planning policies and decisions should ensure that developments:

- a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;
- b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;
- c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);
- d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;
- e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and
- f) create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.”

10.2 NPPF paragraph 187 states that:

“Planning policies and decisions should contribute to and enhance the natural and local environment by:

- a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan;
- b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, of trees and woodland; ...”

10.3 MWLP Policy 17 requires waste development to amongst other things, “be sympathetic to the local character, history, including the surrounding building and landscape setting, while not discouraging appropriate innovation or change (such as increased densities) and to “provide a landscape enhancement scheme which

takes account of any relevant landscape character assessments (including any historic landscape characterisation) and which demonstrates that the proposed development can be assimilated into its surroundings and local landscape character”.

- 10.4 HLP policy LP10 states that “All development in the countryside must:...
- b. recognise the intrinsic character and beauty of the countryside;” HLP policy LP11: Design Context states that:
- “A proposal will be supported where it is demonstrated that it responds positively to its context and has drawn inspiration from the key characteristics of its surroundings, including natural, historic and built environment, to help create distinctive, high quality and well designed places. In order to achieve this a proposal will need to have applied the guidance contained in the Huntingdonshire Design Guide SPD (2017), the Huntingdonshire Landscape and Townscape Assessment SPD (2007) or successor documents and applicable conservation area character statements. A proposal should also have had regard to relevant advice or guidance that promotes high quality design, details the quality or character of the area or describes how the area should develop in the future.”
- 10.5 HLP policy LP12 states that a proposal will be supported where it “a. contributes positively to the area’s character and identity; b. successfully integrates with adjoining buildings, the routes and spaces between buildings, topography and landscape.” HLP policy LP19 states that “A proposal for the expansion of an established industrial or rural business on land outside of its existing operational site in the open countryside will be supported where it is demonstrated that: ...h. the scale, character and siting of the proposal will not have a detrimental impact on its immediate surroundings and the wider landscape.” HLP policy LP35 states that “A proposal for a renewable or low carbon energy generating scheme, other than wind energy, will be supported where it is demonstrated that all potential adverse impacts including cumulative impacts are or can be made acceptable.” Supporting paragraph 8.52 states that landscape is one of the potential adverse impacts that should be taken into consideration.
- 10.6 HLP policy LP31 seeks to protect trees and hedges and that:
- “Where loss, threat or damage cannot be fully addressed through minimisation and/ or mitigation measures the proposal may be supported if alternative measures such as reinstatement of features, additional landscaping, habitat creation or tree planting will compensate for the harm and can be implemented and established before development starts.”
- 10.7 The proposed development includes the erection of a 20 metre high boiler building with a 44 metre high stack and other buildings and infrastructure between 10 and 14 metres high. Under the right atmospheric conditions, a white plume can be created from hot, wet exhaust gases being cooled to ambient temperature, resulting in condensation of the water vapour within that exhaust gas. A plume could increase the visibility of the proposed development. Landscape and visual impact are included in the Environmental Impact Assessment. The application was accompanied by a Landscape and Visual Impact Assessment (DSA Environment & Design, Rev B January 2023) (the LVIA). Owing to a lack of capacity within

Huntingdonshire District Council's landscape team when the planning application was first submitted, the WPA sought advice from an independent consultant, Greater Cambridge Shared Planning, on landscape and visual impact. In response to the council's landscape consultant's comments (31 March 2023) which informed the WPA's formal request for further information dated 12 May 2024 the LVIA was revised (Rev D May 2024). The LVIA was revised again (Rev F April 2025) to take into account the reduction in the height of the boiler building and the more detailed assessment of likely plume visibility undertaken by Stopford is summarised in paragraph 9.6.1 of the ES (Rev A3 19/05/2025). The 2024 and 2025 information was assessed by Huntingdonshire District Council's landscape officer, taking into account the consultant's original comments.

### Landscape character

- 10.8 Landscape character may be defined as a distinct and recognisable pattern of elements, or characteristics, in the landscape that make one landscape different from another. The Site is not within an area designated for its landscape value i.e. a National Park or National Landscape (formerly known as an Area of Outstanding Natural Beauty). It is at the northeastern-most edge of Natural England's National Character Area 88 (NCA) Bedfordshire and Cambridgeshire Claylands, a gently undulating lowland plateau divided by shallow river valleys that gradually widen as they approach The Fens NCA in the east. At a district level in the Huntingdonshire Landscape and Townscape SPD (March 2022) the Site is within a relatively narrow band of Fen Margin between the Central Claylands and The Fens Landscape Character Area (LCA).
- 10.9 The Site lies at approximately 8 metres AOD, approximately 2 metres below the yard serving the adjacent MRF. It is situated between the flat Fen farmland to the northeast which generally lies at around 0 metres AOD and the restored landfill site to the southwest. The Fens are characterised by rectilinear fields, often separated by ditches rather than hedges with isolated farmsteads and relatively large modern agricultural buildings. A noticeable feature in the flat landscape is the Red Tile wind farm (12 turbines, blade tip height 100 metres) approximately 3.5 km to the northeast of the Site. The landfill rises generally from north to south with two 'high points'. The western and central section for the most part rises to 24 metres AOD with a small area at around 25 metres AOD. The high point east of centre and due south of the MRF building rises to approximately 32 metres AOD. The southern edge of the landfill site drops steeply to where it meets the boundary with the adjacent field at 23 – 24 metres AOD. The field is part of a plateau of farmland extending to the village of Warboys at around 25 metres AOD.
- 10.10 The revised LVIA that was submitted expanded the sections on the study area and on local landscape character. The 4 km study area based on a Zone of Theoretical Visibility was assessed as having medium sensitivity and slight overall effects at both the construction and operational phases. The landscape sensitivity of the Fen Margin LCA was re-evaluated to having a high to medium instead of medium sensitivity and the overall effects of the development at both the construction and operational phases being moderate/slight adverse instead of slight adverse, becoming negligible over time with landscape mitigation and management. The Fens and Central Claylands LCAs were assessed as having medium sensitivity and

negligible overall effects. The landscape fabric of the Site itself was assessed as having medium sensitivity, moderate adverse overall effects during the construction phase and slight adverse overall effects at the operational phase.

- 10.11 The LVIA considers the cumulative effects of the proposed development with other future development (residential development at Station Road, Warboys – application subsequently withdrawn; two 21.5 metre blade tip wind turbines to the south of Fenside Road - approved; and changes to Fenside Caravan Park – appeal in progress). It concludes that these would be physically separated from the Site and are not of a sufficient size to have any significant impact on the key characteristics of the local landscape character.
- 10.12 The council’s landscape consultant (31 March 2023) considered that overall, the landscape effects were understated in the original LVIA, in particular that the magnitude of the operational effects of the Fen Margin would be high with little opportunity to introduce more meaningful, characteristic mitigation. The applicant recognises this on page 2 of the revised LVIA “There is little space on site for effective landscape intervention through planting except for a thin margin along the northeastern edge of the site.” It is unclear how the moderate/slight adverse landscape impacts would become a negligible effect in time. It is also considered that the magnitude of the effects on the Site itself would be high as it would largely be cleared of its existing features and vegetation. Again, with little scope for meaningful mitigation, it is not clear how the magnitude of effects would reduce to slight during the operational phase.
- 10.13 The LVIA conclusion on landscape effects is that there would be no significant impacts on landscape character from the proposed development. It evaluates that the study area and landscape fabric of the Site itself would experience a moderate adverse impact at first, reducing to slight adverse impact with the establishment of the woodland and hedgerow planting along the northern boundary and woodland blocks to the south and that the Fen Margin would experience a moderate / slight adverse impact.
- 10.14 The applicant acknowledges at paragraph 9.2.2 of the LVIA that “The proposals will introduce a large industrial unit into an agricultural and semi industrial landscape. Taller infrastructure, including electricity pylons and wind turbines, are present locally.” The proposed development is not characteristic of the scale found in this landscape, particularly the boiler building and stack, and there is little capacity on the Site to provide mitigating features that would be typical of this landscape. The proposed development responds poorly to the scale of the host landscape, the Site is a poor location for the proposed development due to the sensitivity of the host landscape to intrusive structures, and the lack of opportunity for any meaningful mitigation suggests over-development of the Site.
- 10.15 The Site is not within an area designated for its landscape value, but it is recognised that nevertheless the countryside around the Site is valued by its residents and by visitors as shown by individuals whose response raised concerns about the impact of elements of the proposed development on the countryside. The proposed development does not comply with:

- i) MWLP Policy 17 (f) and NPPF paragraph 135 c) because it would not be sympathetic to the landscape setting;
- ii) HLP policy LP10 b. and NPPF paragraph 187 b) because it does not recognise the intrinsic character and beauty of the countryside;
- iii) HLP policy LP11 because it does not respond positively to its context;
- iv) HLP policy LP12 a. because it would not contribute positively to the area's character and identity or b. because it would not successfully integrate with topography and landscape;
- v) HLP policy 19 h. because its scale, character and siting would have a detrimental impact on its immediate surroundings and the wider landscape; and
- vi) HLP policy LP35 because not all adverse impacts can be made acceptable.

## Visual impact

- 10.16 Visual impacts are the aesthetic changes during or as a result of development that are seen by receptors at identified viewpoints. Adverse visual impacts may, but do not always, affect the broader character of the host landscape. For example, a new barn on a farm may have an adverse visual impact when viewed from a public footpath but not change the overall character of the landscape as being agricultural.
- 10.17 In response to the council's landscape consultant's comments (31 March 2023) some elements of the proposal were redesigned to allow for additional planting to provide screening. The boiler building would have an approximately 10% smaller footprint but be the same height of 25 metres to the ridge. This would allow a 3 metre high bund to be constructed between the boiler building and northeast boundary of the Site. In May 2025 the proposal was amended again, reducing the height of the boiler building from 25 metres to 20 metres. Some of the images from the LVIA have been reproduced in this report but some clarity has been lost. It is recommended that they are viewed in their original form using this link to the CCC website: Application documents (published 28 May 2025).
- 10.18 The applicant's LVIA had a study area of a radius of 4 kilometres from the Site within which the visibility of the proposed development was assessed. Appendix E of the LVIA shows locations where various elements of the proposed development would theoretically be seen from i.e. not taking account of vegetation or buildings. Most of the proposed buildings (and the boiler building and the stack) would theoretically be visible from the Fens to the northwest, north and northeast of the Site and towards Pidley in the southeast. The 20 metre high boiler building (and the stack) would theoretically be visible from Warboys village and south of the village, from land southwest of Warboys Wood and from Pidley Fen to the southeast towards Somersham but from less extensive areas than a 25 metre high building. From approximately the line of the A141 across Pidley Fen, locations between Warboys and Wistow, locations beyond Warboys and Wistow and from Bury only the stack would theoretically be visible.
- 10.19 The applicant has used atmospheric dispersion modelling system (ADMS) to model plume visibility above the residential receptors identified in the Air Quality Assessment. Based on an exhaust water content of 7 % volume and using five years of annual meteorological data (2017 - 2021), the modelling showed that there would be a visible plume for two 1-hour periods over the 5 years modelled. Using

Environment Agency significance criteria on plume visibility, the impact is deemed low. This is because of the following criteria:

- Small impact from the operation of the process; and
- Visible plume length exceeds the site boundary <5% of daylight hours per year.

10.20 The assessment determines that the maximum length plumes are estimated to be less than 3 metres, suggesting that the overall perceived height of the development would be 47 metres to the top of plume. This would only slightly increase the height of the chimney stack when viewed from the surrounding landscape and not to a large enough degree to materially change the outcome of the LVIA.

10.21 The LVIA has used 11 representative publicly accessible viewpoints of the Site. These are shown on Figure 3 below reproduced from the LVIA. The visual sensitivity stated is the applicant's which the council's landscape consultant considers should in most cases be higher. The LVIA included visualisations of the proposed development from Viewpoints 1, 2, 3, and 4 which are reproduced in this report. The applicant did not revise the sensitivity of the receptors on footpaths as recommended by the council's landscape consultant and their assessment of the magnitude of change and the construction and operational effects is also unchanged therefore the council's consultant's comments stand and inform the 'Landscape consultant comments' in the following paragraphs.



Figure 3 – LVIA viewpoints

10.22 Viewpoint 1 – Warboys Footpath 12 off Station Road approximately 500 metres south of the Site, representative of users of the public footpath and people at Humbrills Farm. The ridgeline prevents views of the MRF building and mature

woodland generally restricts views from the footpath towards the. Visual sensitivity: medium/low.

Viewpoint 1 – With development, year 15



Construction: Taller plant such as cranes may be visible. Magnitude of change: low. Construction effects: slight / negligible adverse.

Operation: The existing vegetation and topography provide screening to the proposed development. Properties along Station Road may experience some views of the top of the buildings due to their elevated position in relation to the Site. Most of the proposed Site should be screened, with only the very top of the stack and plume when present visible over the ridge line and parts of the boiler building roof visible from isolated property along Station Road. Even in winter the dense nature of the field boundaries would provide an element of screening to the proposals. Magnitude of change: low adverse. Operational effects: slight /negligible adverse.

10.23 Landscape consultant comment: The viewpoint is representative of a footpath, local road and dwellings therefore the visual sensitivity should be high which when combined with the magnitude of the effect will increase the overall effect.

10.24 Viewpoint 2 – Junction of Fenside Road and Puddock Road near the Old Railway Tavern approximately 100 metres southeast of the Site representative of road users and the Old Railway Tavern. Neither the MRF building nor offices are visible owing to the existing screening bund within the Woodford site. Visual sensitivity: medium / low.

Viewpoint 2 – With development, year 15



Construction: Taller plant such as cranes may be visible, and the boiler building would likely be visible. Construction traffic would be noticeable. Magnitude of change: medium. Construction effects: moderate / slight adverse.

Operation: The majority of the proposed development would not be visible, due to the screening effect of the existing bund. The taller elements (the boiler building and stack) would rise above the bund and break the skyline from this location, more so from first floor windows of Old Railway Tavern. In time the recent landscape planting on the slope facing the road would mature and create a wooded slope rather than the quite 'engineered' mound at present. Magnitude of change: medium/low. Operational effects: slight adverse.

10.25 Landscape consultant comment: The viewpoint is representative of cyclists on Cycle Ride 13, residents, and local roads. The section of road is also a connection between north-south footpaths and bridleways. In accordance with the Landscape Institute's Guidelines for Landscape and Visual Impact Assessment 3rd edition (GLVIA3) this viewpoint should have a visual sensitivity of high to high-medium. The boiler building and stack comprise a large part of the proposed development and would be far larger than any existing structures within the landscape. Even if these are the only visible elements, they are incongruous in the environment and would receive visual prominence. The magnitude of change is likely to be medium or medium-high. Paired with the sensitivity of the view, the overall affect in the operational stage will be at least substantial/moderate adverse. Some reduction may occur as the vegetation matures, but the boiler building, stack and plume will remain prominent in the view.

10.26 Viewpoint 3 – Puddock Road near Hazeldene approximately 700 metres north of the Site representative of road users and residents along Puddock Road. Open expansive views typical of the Fen landscape. The building labelled on the photograph below as 'Existing Woodford Recycling building' are the offices. The light coloured MRF building is clearly visible against the restored landfill site. Visual sensitivity: medium.

Viewpoint 3 – Existing view (Sept 2022)



### Viewpoint 3 – with development, year 15



Construction: The Site will be seen during construction including moving vehicles. Magnitude of change: medium. Construction effects: moderate adverse.

Operation: Most of the development would be lower or equal in height than the existing MRF building and won't break the skyline due to the ridge in the background. With an appropriate colour, the development would be seen less clearly than the MRF building against the restored landfill site. The top of the stack would break the skyline. In time the proposed landscape treatment along the boundary would mature and provide screening to the lower parts of the development including vehicle movements. The plume when present will increase the development's prominence. Magnitude of change: low. Operational effects: slight adverse.

- 10.27 Landscape consultant comment: As this viewpoint is representative of dwellings and road users the visual sensitivity should be high/medium. The large structure which will remain visible even when planting matures, and break the skyline, will result in a higher magnitude of change than the stated 'low'. The relationship between the high land of the settlements and the low land of the Fens is a key feature of the view. The proposed development, particularly the boiler building, stack and any plume, would compete with the visual presence of that landform and receive visual prominence. These interruptions in the skyline are not currently present in the view. The magnitude of effect is likely to be medium, and the overall operational effect substantial/moderate.

### Viewpoint 3 – Image from LVIA Rev C Jan 2018 for biomass development



Above is an image from the LVIA which supported the application of the biomass development is included above to enable comparison with the proposed scheme. The boiler building would be significantly larger than the main biomass project buildings and the stack 19 metres higher. 10.28 Viewpoint 4 – Straight Drove

near Dorrington Farmhouse approximately 1,200 metres northwest of the Site, representative of road users. The existing MRF building can be clearly seen against the existing ridge and woodland. Visual sensitivity: medium / low.

#### Viewpoint 4 – with development, year 15



Construction: Machinery would be visible. Magnitude of change: medium / low  
Construction effects: slight adverse.

Operation: The majority of the proposal would not break the skyline and would have the ridge and Pingle Wood as a backdrop. Some of the boiler building and most of the stack will break the skyline where they are not viewed against the hillside and increase the visibility of the development within an expansive view with other man-made features. Woodland planting along the western boundary of the wider landfill site would provide additional screening to the proposed buildings, leaving only taller elements and the plume visible. Magnitude of change: medium / low. Operational effects: slight adverse.

10.29 Landscape consultant comment: The existing site and proposed development would likely be visible from residents at Dorrington's Farm. The sensitivity of the receptor should be medium, as opposed to medium/low.

10.30 Viewpoint 5 – Footpath Warboys 2 north of Third Avenue, Warboys approximately 1,500 metres south of the Site representative of public rights of way users and residents. The existing view is characteristically open but being south of the ridge line is not as extensive as it would be over the Fens. The horizon is formed by the ridge. The existing MRF building cannot be seen from here. Visual sensitivity: medium / low.

#### Viewpoint 5 – September 2022

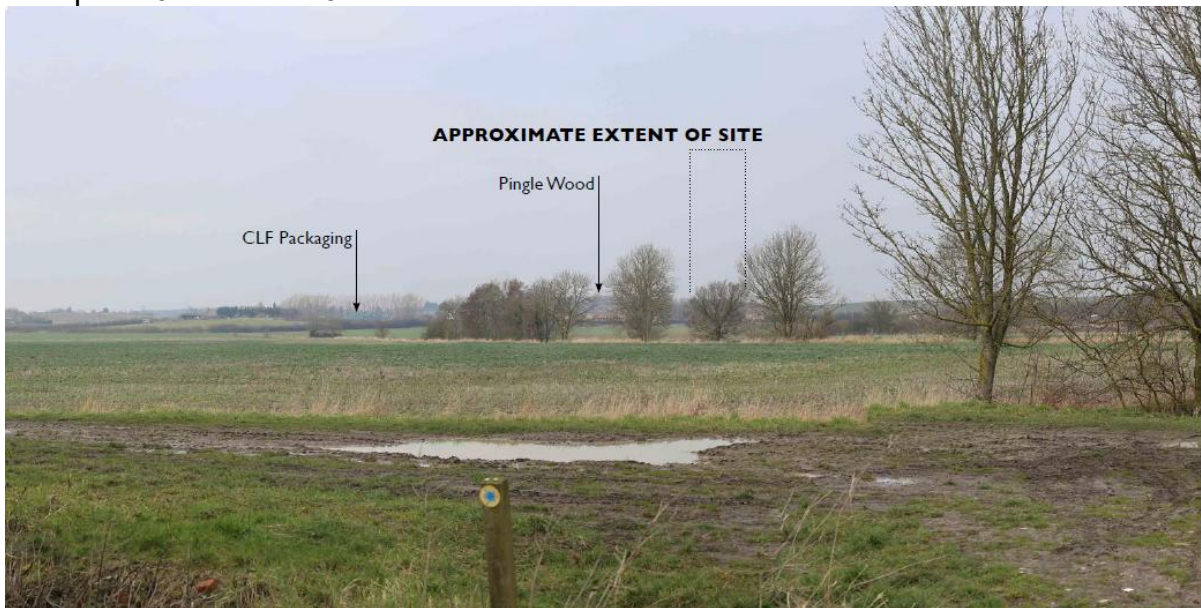


Construction: Taller plant may be visible. Magnitude of change: low. Construction effects: slight / negligible adverse.

Operation: The development would be mostly screened from this location due to local vegetation and built form. The top of the boiler building (20 metres with a base around 8 metres AOD giving a total height of 28 metres AOD) would not be visible over the ridge, which rises to a maximum of 32 metres AOD. Existing vegetation between the viewer and the Site would add screening but the 44 metre stack would still be visible, but its thin form would make it difficult to distinguish from other man-made structures. Magnitude of change: negligible. Operational effects: negligible.

- 10.31 Landscape consultant comment: The receptors are people using footpaths and people in the dwellings. The sensitivity of this receptor should be high and not medium/low as stated. The stack reaching above the horizon here will appear extremely incongruous. Being far away and lower down, and yet still detracting from the skyline, the structure would appear out of scale with the context. A visualisation of the development in this location would be extremely useful but has not been provided. It would also be useful to have an additional viewpoint either on the footpath to the north of Wiggs Close, or on the B1040 Ramsey Road, just west of Warboys.
- 10.32 Viewpoint 6 – Pathfinder long distance walk (Pidley cum Fenton Bridleway 14) at junction with Bridleway 13 and Bridleway 15 Padgetts Lane approximately 2,200 metres southeast of the Site representative of public rights of way users. The MRF building is screened from view by intervening buildings and vegetation. Visual sensitivity: high / medium.

#### Viewpoint 6 – March 2022

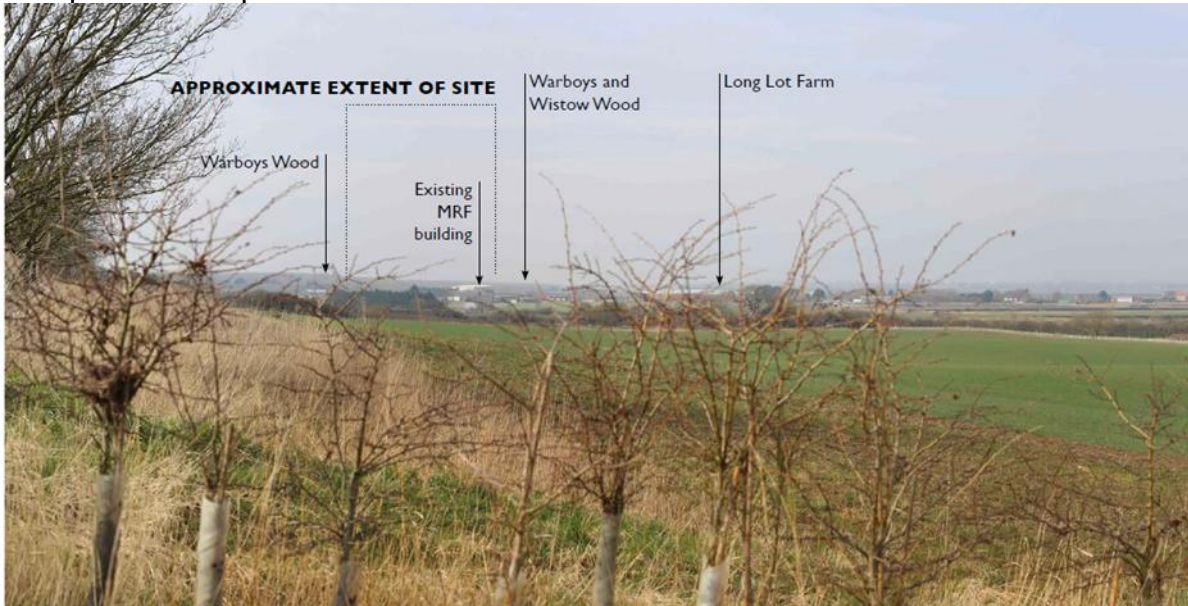


Construction: Cranes may be visible. Magnitude of change: negligible. Construction effects: negligible.

Operation: Pingle Wood on the ridge which rises higher than the proposed boiler building would screen the majority of the proposed development. The stack and plume would be the only elements of the proposed development that would be visible. Magnitude of change: negligible. Operational effects: negligible.

- 10.33 Landscape consultant comment: The sensitivity of receptors at this viewpoint should be high because it is on a long-distance walking route.
- 10.34 Viewpoint 7 - Warboys Footpath 8 near Woolvey Farm approximately 2 km east of the Site representative of public rights of way users. The view is elevated overlooking a wide expanse of the Fens. The MRF building, agricultural buildings and windfarms can be seen. Visual sensitivity: medium.

Viewpoint 7 – Sept 2022



Construction: Vehicle movements will be noticeable, but at this distance would look similar to agricultural or existing traffic associated with the recycling facility. Magnitude of change: negligible. Construction effects: negligible.

Operation: The proposed development would be visible, although most of the volume would sit slightly lower down the ridge. Most of the stack would break the skyline from this location drawing attention to the proposed development. The change in view due to the proposed development is very minor as a proportion of the existing, expansive view available, in an area already populated with built form. With darker colour choice for materials the proposed development may actually screen the highly visible existing MRF facility. Magnitude of change: negligible, but potentially beneficial with screening/ colouring of existing MRF facility. Operational effects: negligible, but potentially beneficial with screening/ colouring of existing MRF facility.

- 10.35 Landscape consultant comment: The visual sensitivity should be high-medium. The presence of incongruous buildings on the Fen Margin is a recognised sensitivity of the landscape which should be recognised in the assessment. The magnitude of change should be higher than assessed, as the boiler building will be the only bulky structure to break the skyline. It is accepted that the stack is likely to read as a part of the vertical detractors already present in the view.
- 10.36 Viewpoint 8 – Junction of Warboys bridleway 15 Cross Drove and bridleway 17 Second Turf Fen Drove 1600 metres northeast of the Site representative of users of

the public rights of way that cross Turf Fen. The MRF building can be seen between the agricultural buildings of Long Lot Farm and vegetation along Puddock Road. Visual sensitivity: medium.

#### Viewpoint 8 – Bridleways, Turf Fen March 2022



Construction: Glimpsed view between buildings and vegetation meaning construction traffic could be seen briefly. Magnitude of change: low. Construction effects: slight adverse.

Operation: The proposed development will appear as a small extension of the existing facility. Agricultural buildings are in the foreground. The stack will rise further above the skyline and become a noticeable marker in the view. Magnitude of change: low. Operational effects: slight adverse.

10.37 Landscape consultant comment: The height of the proposed structures is a concern in the quality of this view. Although it is accepted that from this distance, a careful colour choice would help to blend the building into the appearance of the hill, the stack will likely be relatively noticeable where it breaks the skyline. The development would represent the kind of hard edges that the HDC Landscape and Townscape SPD (2022) guides against. All buildings within the current view nestle below the horizon.

10.38 Viewpoint 9 – Puddock Road, near Lant's Farm approximately 3 km northeast of the Site representative of road users including cyclists and residents on Puddock Road. The horizon is generally distant, broken in places by existing vegetation, buildings and particularly the wind farms in the area. Glimpses of the Site are available through the vegetation and buildings when travelling south along Puddock Road albeit very distant. Visual sensitivity: medium.

### Viewpoint 9 - Puddock Road, near Lant's Farm March 2022



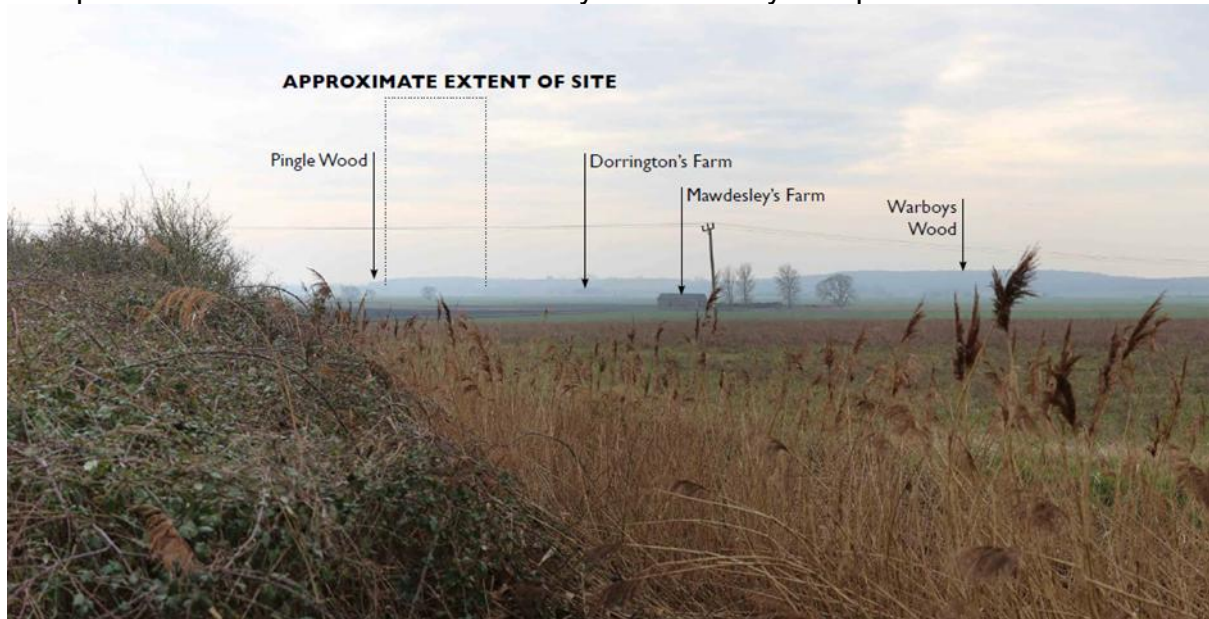
Construction: Difficult to see at this distance amongst buildings and vegetation. Magnitude of change: negligible. Construction effects: negligible.

Operation: The change in view will be very slight. Colour choice will help reduce the development's visual prominence, even at considerable distance. The stack will break the skyline but at this distance and in the context of the whole view would draw little attention to the development. The plume would not be visible. Magnitude of change: negligible. Operational effects: negligible.

10.39 Landscape consultant comment: None specific.

10.40 Viewpoint 10 – Hollow Lane near Holbury and Ramsey Footpath 1, approximately 3 km to the northwest of the Site representative of residents on Hollow Lane, Ramsey. This view is open and expansive across the generally flat landscape. The MRF building can be seen but at this distance appears as one of the agricultural buildings in the area. Visual Sensitivity: medium / low.

## Viewpoint 10 – Hollow Lane near Holbury and Ramsey Footpath 1 March 2022



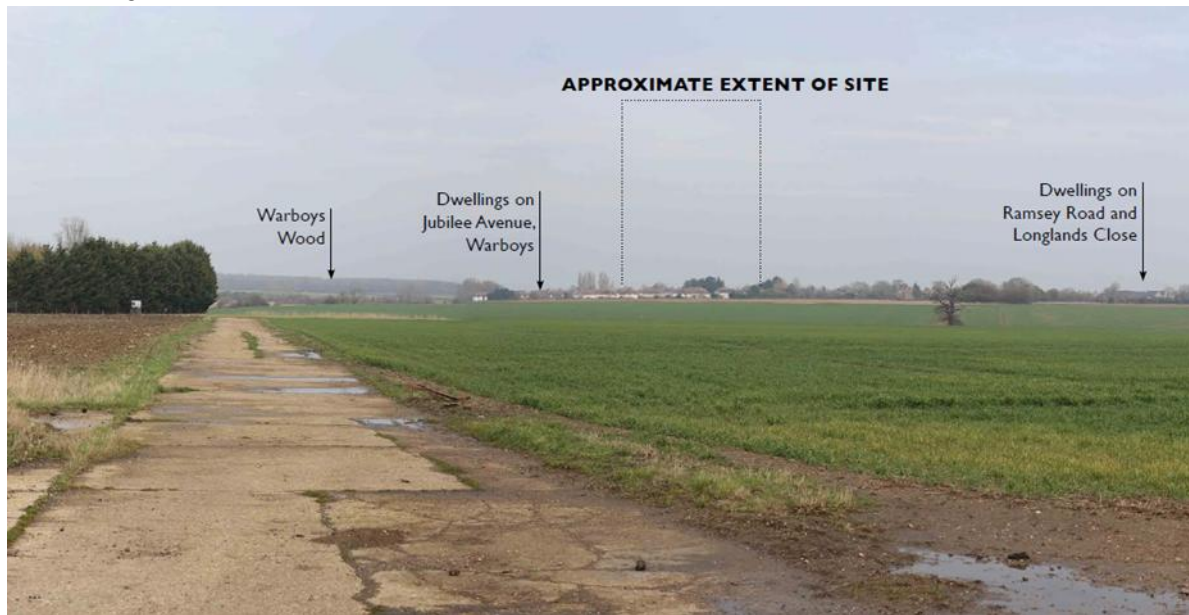
Construction: Construction traffic and material storage would be difficult to see at this range. Magnitude of change: negligible. Operation effects: negligible.

Operation: Most of the buildings will have the existing ridge and Pingle Wood as a backdrop. At this distance colour choice would allow the buildings to blend into the dark, wooded ridge line. The stack would break the horizon and be a noticeable feature in the landscape. The plume would not be visible from here. Magnitude of change: negligible. Operational effects: negligible.

10.41 Landscape consultant comment: None specific.

10.42 Viewpoint 11 – Pathfinder Long Distance Walk (Warboys Footpath 5, northern edge of former airfield) approximately 2.8 km southwest of the Site, representative of public rights of way users and the Ramsey Model Aero Club. This view is open and expansive across the generally flat landscape. The Site is screened by trees and dwellings in Warboys. Visual sensitivity: high / medium.

Viewpoint 11 – Pathfinder Long Distance Walk northern edge of former airfield  
March 2022



Construction: No change in view. The Site is screened by trees and dwellings in Warboys. Magnitude of change: none Construction effects: none

Operation: All the proposed buildings would be screened by Warboys and vegetation. The stack may be seen drawing attention to the proposed development but the plume would not be visible. Magnitude of change: negligible. Operational effects: negligible.

10.43 Landscape consultant comments: None specific.

10.44 The applicant's LVIA concludes that none of the 11 viewpoints is expected to experience more than a moderate adverse effect during the construction phase of the proposed development. The effect would be none or negligible at 5 viewpoints; slight adverse or slight/negligible adverse at VPs 1, 4, 5 and 8; medium/low at VP4; and moderate/slight or moderate at VPs 2 and 3.

10.45 During the operational phase the applicant's LVIA concludes that none of the viewpoints is expected to experience more than a slight adverse effect. The effect would be negligible at 6 viewpoints; slight/negligible adverse at VP1; and slight adverse at VPs 2, 3, 4 and 8. In the applicant's opinion "With the implementation of a detailed landscape scheme of mitigation proposals to improve boundaries immediately around the Site and increase the number of hedgerow trees present on site it is believed that nearly all of the predicted impacts can be reduced to slight adverse, or lower."

#### Proposed mitigation

10.46 The council's landscape consultant was concerned that the Site does not have capacity for mitigation that would help soften and screen the development from the Fen landscape. The original proposal for a 3 metre wide strip on the northeastern boundary to be planted with a hedgerow and trees would not enable the additional

landform or layering of planting necessary to provide effective screening. The height of the boiler building was considered to be unacceptable, and any redesign should prevent skylining from views from the Fen and on the northern edge of Warboys. This has been achieved by reducing its height by 5 metres. The restored landfill 'behind' the proposed boiler building, when viewed from the Fen, rises to between 30 and 32 metres AOD. The boiler building would have a base elevation of 8.2 metres AOD and having been reduced to 20 metres in height the roofline would be 28.2 metres AOD which would be below the ridgeline.

10.47 The applicant's LVIA identifies primary mitigation which would include dark colours for the buildings to blend into the local landscape unlike the light coloured MRF building but a light colour for the stack which would be viewed against the sky. It also states that the site layout would minimise the loss of existing hedgerow boundaries and that retained trees would be protected. However, the applicant's Arboricultural Impact Assessment shows that nearly all the trees within the Site would be removed. Although classified as being Category C (low quality or young specimens) collectively they have merit in terms of landscape character. The proposal would not comply with HLP Policy LP31 in respect of its impact on trees.

10.48 As set out in paragraph 1.8, the proposal was amended to enable more landscape mitigation to be incorporated into the scheme. In response to the council's landscape consultant's comments the proposed secondary mitigation was increased to:

- tree and hedgerow planting along the northern and eastern boundaries where the Site meets the open expanse of the Fens;
- a 3 metre high bund planted with trees between the boiler building and the northern boundary to give a second layer of screening; and
- woodland belt along part of the southern boundary of the restored landfill site to create a wooded backdrop to the formerly hard edge of the boiler building that would rise above the existing ridge line when viewed from the north.

10.49 The proposed boundary planting, when mature, would break up the appearance of the lower parts of the turbine hall, air cooled condenser, fuel bays and boiler building when viewed from the Fen to the north. The planted bund would provide some layering and additional height for the planting which would break up more of the boiler building (see Figure 4 below). However, the HDC landscape officer does not consider that the mitigation proposed on the Site itself would adequately screen the development and that there is nowhere else where effective screening could be introduced.

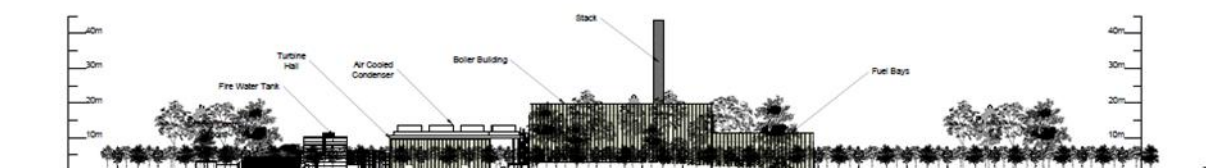


Figure 4 – extract from drawing no. D6628-MP-0004 Rev A5 'Site Elevation Drawings' (view from the northeast)

10.50 As set out in paragraph 1.3 the Site had planning permission for another energy from waste (biomass) scheme (planning permission H/5002/18/CW) and in paragraph 9.49 that the applicant has afforded this weight in their Alternative Sites Assessment. The difference in scale of the biomass scheme that was approved, and the current proposal is shown in the table in paragraph 10.51 below and for comparison, the size of the MRF building.

10.51 The following table shows the dimensions of the proposed stack and boiler building; the stack and building that were approved on the Site under planning permission H/5002/18/CW; and the Woodford MRF building.

<b>Development</b>	<b>Stack height x diameter (metres)</b>	<b>Dimensions of principal building (metres)</b>
Thermeco (proposed)	44 x (2 x 1.4)	52 x 50 x 20 high
Biomass EfW (approved)	25 x 10*	41.6 x 18.9 x 9.1 high
Woodford MRF (existing)	n/a	45 x 37.5 x 12 high**

\*combustor 10 metres diameter to 20 metres plus 5 metre high flue

\*\* effectively 14 metres because floor level approximately 2 metres above the level of the Site

10.52 Significantly, the proposed boiler building would be more than twice as high and would have a footprint over 3 times greater than the principal biomass building biomass building. The proposed stack, although with a smaller diameter, would be significantly taller than the combustor with flue for the biomass scheme. The smaller scale of the biomass scheme enabled the existing bund along the northern boundary of the Site to be retained, reprofiled and planted which would help assimilate the development into the local landscape.

#### Visual impact conclusions

10.53 The proposed development is unsympathetic in scale to the host landscape and would present an incongruous feature in a setting widely identified as sensitive to large-scale and hard edges, which would have long reaching visual impacts. The proposals would lead to the clearance of a vast majority of existing site features with little opportunity for landscape and visual mitigation, and as such the proposals represent overdevelopment of the Site. Visual receptors on the network of public rights of way in the Fens will experience changes in view, whereby the existing skyline, currently defined by landform and vegetation, with some residential development visible on higher land, would be broken by the stack, detracting from the horizontality of the landscape and the important transition from the fens to higher land. The proposed development, in addition to the reasons set out in paragraph 10.15 above, does not comply with:

- i) MWLP Policy 17 (g) because it does not retain important features and assets (including trees and hedgerows) within the landscape;
- ii) MWLP Policy 17 (h) because it does not provide a landscape enhancement scheme which demonstrates it can be assimilated into its surroundings and local landscape character;

- iii) HLP policy 31 because the loss of trees is not fully addressed through the mitigation measures; and
- iv) NPPF paragraph 135 a) because it would not be visually attractive as a result of good architecture, layout and appropriate and effective landscaping.

10.54 Overall, it is considered the proposed development would have unacceptable landscape and visual impacts for the reasons set out in paragraphs 10.15 and 10.53 above.

## 11. Nature conservation

Relevant policies: NPPF paragraphs 187 and 193  
MWLP Policy 20  
HLP policy LP30

- 11.1 These policies seek to protect sites that are designated for their nature conservation value, protected species, the ecological interests of the site itself and to secure biodiversity net gain (BNG).
- 11.2 NPPF paragraph 187 states that “Planning policies and decisions should contribute to and enhance the natural and local environment by:
  - a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan); ...
  - d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures and incorporating features which support priority or threatened species such as swifts, bats and hedgehogs;”
- 11.3 NPPF paragraph 193 states that “When determining planning applications, local planning authorities should apply the following principles:
  - a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;
  - b) development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest;”
- 11.4 MWLP Policy 20 states:  
**“National Sites**  
Development proposals on land within or outside a Site of Special Scientific Interest (SSSI), and which is likely to have an adverse effect on it (either individually or in combination with other developments), will not be permitted unless the benefits of

the development clearly outweigh both the adverse impacts on the features of the site and any adverse impacts on the wider network of SSSIs.

### **Local Sites**

Development likely to have an adverse effect on locally designated sites, their features or their function as part of the ecological network, including County Wildlife Sites and Local Geological Sites, will only be permitted where the need and benefits of the development clearly outweigh the loss and the coherence of the local ecological network is maintained.

### **Habitats and Species of Local and Principal Importance**

Where adverse impacts are likely on the protection and recovery of priority species and habitats, development will only be permitted where the need for and benefits of the development clearly outweigh these impacts. Where adverse impacts are likely on other locally important habitats and species as identified by the Cambridgeshire and Peterborough Biodiversity Partnership, the benefits of development must outweigh these impacts. In both cases, appropriate mitigation and/or compensatory measures will be required.

### **Biodiversity and Geodiversity in Development**

All development proposals must:

- “(d) conserve and enhance the network of geodiversity, habitats, species and sites (both statutory and non-statutory) of international, national and local importance commensurate with their status and give appropriate weight to their importance;
- (e) avoid negative impacts on biodiversity and geodiversity;
- (f) deliver a measurable net gain in biodiversity, proportionate to the scale of development proposed, by creating, restoring and enhancing habitats and enhancing them for the benefit of species;
- (g) where viable opportunities arise, contribute to the delivery of the Local Nature Partnership vision to ‘double land for nature’;”

Policy 20 concludes with:

#### **“Mitigation of Potential Adverse Impacts of Development**

Development should avoid adverse impact on existing biodiversity and geodiversity features as a first principle. Where adverse impacts are unavoidable they must be adequately and proportionately mitigated. If full mitigation cannot be provided, compensation will be required as a last resort where there is no alternative.”

11.5 The most relevant parts of HLP policy LP30 state that:

“All possible efforts must be taken to avoid adverse impacts. If it is demonstrated that adverse impacts are unavoidable they must be minimised as far as possible and then mitigated. Only where this process of avoidance, minimisation and then mitigation is insufficient to fully address adverse impacts will consideration be given to compensation measures. Following this process a proposal will only be supported subject to a hierarchy where: ...

b. a site of national importance, such as a Site of Special Scientific Interest (SSSI) or National Nature Reserve (NNR) would be affected there has to be exceptional circumstances where the need for, and the benefits of, the proposal significantly

outweigh both the potential impacts on the features of the site that make it of national importance and any broader impacts on the national network of such sites; c. a protected species, a priority habitat or species, a site of local or regional importance, the achievement of water body good ecological potential, or the biodiversity value of the proposed development site as part of the wider network would be affected, the need for and the benefits of the proposal must clearly outweigh the assessed impacts.”

“A proposal will ensure no net loss in biodiversity and provide a net gain where possible, through the planned retention, enhancement and creation of habitats and wildlife features, appropriate to the scale, type and location of development. Large scale development proposals should provide an audit of losses and gains in biodiversity produced according to a recognised methodology. In seeking to provide net gains for biodiversity reference should be had to the Natural Cambridgeshire publication 'Developing with Nature Toolkit' and the proposal should prioritise measures that:

- d. complement or enhance existing features of biodiversity value within the design and layout of development;
- e. provide new biodiversity features within the development;
- f. help reverse the decline of species;
- g. assist in achieving local targets for priority habitats and species including those set out in Habitat Action Plans;
- h. improve public access to nature;
- i. ensure the effective management of biodiversity or geological features;
- j. contribute to the provision of multi-functional green infrastructure to enhance ecological networks and the Green Infrastructure Priority Areas;
- k. contribute towards the achievement of good ecological status in water bodies (or not compromise achievement of good ecological potential) in accordance with the Anglian River Basin Management Plan (RBMP) and accompanying catchment action plans; or
- l. will help species adapt to climate change.”

#### Designated sites

- 11.6 The relationship of the proposed development to sites which are designated for their nature conservation value is set out in paragraph 2.2 above. Although Natural England has recommended that the applicant explores further mitigation to mitigate the minor adverse air quality impacts on the SSSIs and CWSs, they do not object to the application (see paragraph 6.9 above). The CCC Ecology Officer’s concerns have been addressed (see paragraph 6.16 above).
- 11.7 The impact of the development on designated sites will be taken into account by the Environment Agency when they consider the application for an environmental permit. It is considered that with mitigation in place, the proposed development would not have a significant adverse impact on designated sites so would comply with MWLP Policy 20, HLP policy LP30 and NPPF paragraphs 187 and 193 in this respect.

## Protected species

- 11.8 The principal ecological interest of the Site is the habitat that supports populations of great crested newts (GCN) which would be entirely lost. A mitigation strategy is proposed which relies on land outside the application area within land owned by Woodford Recycling with whom the applicant has an agreement for GCN mitigation. The Site Ecological Management Plan for the landfill site takes this into account. A European Protected Species Licence from Natural England would be required and a condition could be imposed precluding any works, including vegetation clearance, until a copy of the licence has been provided to the WPA. Natural England and the CCC Ecology Officer are satisfied with this approach and the proposed development would comply with the policies listed above in respect of protected species.

## Biodiversity

- 11.9 The policies set out above require development proposals to minimise harm to the biodiversity of the site and ensure there is no net loss of biodiversity by providing compensation. The application was submitted before the requirement to deliver at least 10% BNG under the terms of the Environment Act 2021 came into effect in 2024. However, MWLP Policy 20 (f) states that all development must “deliver a measurable net gain in biodiversity, proportionate to the scale of development proposed, by creating, restoring and enhancing habitats and enhancing them for the benefit of species”. NPPF paragraph 187 (d) and HLP Policy LP30 have similar requirements.
- 11.10 Any ecological interests of the Site that would be retained and those on adjacent land could be protected during site clearance and construction by the implementation of best practice measures which could be secured by planning conditions requiring a Construction Environmental Management Plan (CEMP) as recommended by Natural England. However, the proposed development will result in the loss of nearly all the existing habitat on the Site. There is little scope to provide compensation or deliver BNG on site and the applicant proposes that as well as the GCN mitigation, habitat will be created in two places off site. First, relatively close to the Site on the southern boundary of the landfill site where meadow and woodland habitat would be created and second, ponds, mixed scrub and neutral grassland at Great Raveley approximately 6km to the west. The applicant acknowledges that habitat creation on these two sites would need to be secured by S106 agreements with the landowners.
- 11.11 The CCC Ecology Officer does not consider that the off-site proposals would adequately address the impacts on biodiversity for the reasons summarised in paragraph 6.17 above. As set out in paragraph 6.18 above, there is potential for the applicant to overcome these concerns by redesigning the off-site schemes but it is considered that in their current form they do not adequately compensate for the loss of on-site habitat compensation and would not deliver the level of BNG that is claimed. For this reason it is considered that the proposed development does not comply with MWLP Policy 20, HLP policy LP30 and NPPF paragraphs 187 d) and 193 a).

## 12. Air quality

Relevant policies: NPPF paragraphs 187, 198, 199 & 201  
MWLP policies 17 & 18  
HLP policies LP10, LP14 & LP36

12.1 These policies seek to protect the occupiers of nearby land or property from emissions to air including odour and dust. The Site is not in or close to an air quality management area (AQMA). However, waste developments can have an adverse impact on air quality without appropriate mitigation. This can lead to wider impacts such as on human health and the natural environment. There is concern within the local community about emissions to air from combustion of RDF and the resulting bottom ash and their potentially negative effect on air quality and therefore to health either directly through inhalation, or from deposition on land from where it may enter the food chain. As was the case with other energy from waste proposals, CCC engaged a consultant, Penny Wilson of Air Quality Consultants, to assess this aspect of the development when the application was first submitted. The 2024 and 2025 information has been reviewed by the EHO.

### Emissions to air

12.2 In response to the initial comments from Air Quality Consultants and the CCC Public Health Team in 2023, the applicant provided a revised Air Quality Assessment (AQA) and Addendum in September 2024 which in the opinion of the of the EHO did not address all the issues raised. Further information was submitted in May 2025 and apart from three minor issues, has satisfied the EHO that with the controls in place through the environmental permit, the development will not have a significant adverse impact on air quality (see paragraphs 6.4 and 6.5 above.

12.3 The Environment Agency document “Guidance for developments requiring planning permission and environmental permits” (October 2012) [LIT 7260 bba627.pdf](https://www.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/7260_bba627.pdf) (publishing.service.gov.uk) explains the relationship between the planning and permitting regimes, their role as a consultee in the planning process and their permitting role. When responding to consultations on planning applications for development that would require an environmental permit the Environment Agency has three possible positions:

1. No major permitting concerns - Have not identified any major concerns about issuing a permit for this development. Consider risks to people and the environment can be reduced satisfactorily using measures to prevent, minimise and/or control pollution.
2. More detailed consideration is required and parallel tracking is recommended as appropriate - Do not currently have enough information to know if the proposed development can meet our requirements to prevent, minimise and/or control pollution.
3. Don't proceed - unlikely to grant a permit. Will object to the development because it is unlikely that the risks to people and the environment can be satisfactorily mitigated in this location.

12.4 The Environment Agency's advice on the current application is simply that the development will need an environmental permit under the Environmental Permitting (England and Wales) Regulations 2016, Regulation 12; they have not identified the need for further information at the planning stage.

12.5 The UK Health Security Agency has provided their position statement on the effects of emissions from municipal waste incinerators and health (see paragraph 6.x above). Like the EHO, they refer to the environmental permitting regime where the applicant will be required to demonstrate that emissions to air are within the relevant limits and abatement measures are in place. This is consistent with NPPF paragraph 201 which states that:

“The focus of planning policies and decisions should be on whether proposed development is an acceptable use of land, rather than the control of processes or emissions (where these are subject to separate pollution control regimes). Planning decisions should assume that these regimes will operate effectively. Equally, where a planning decision has been made on a particular development, the planning issues should not be revisited through the permitting regimes operated by pollution control authorities.”

12.6 NPPW paragraph 7 states that when determining planning applications, waste planning authorities should:

“concern themselves with implementing the planning strategy in the Local Plan and not with the control of processes which are a matter for the pollution control authorities. Waste planning authorities should work on the assumption that the relevant pollution control regime will be properly applied and enforced.”

12.7 The same principle applies where the proposed energy from waste plant is of a scale that it is being considered under the NSIP process (see paragraph 8.9 above); National policy statement NE-3 states:

“2.7.89 Compliance with the Environmental Permitted Regulations (EPR) is enforced through the environmental permitting regime regulated by the EA. Plants not meeting the requirements of the EPR would not be granted a permit to operate.

2.7.90 The pollutants of concern arising from the combustion of waste and biomass may include NO<sub>x</sub>, SO<sub>x</sub>, NMVOCs and particulates. In addition, emissions of heavy metals, dioxins and furans are a consideration for waste combustion generating stations, but limited by the EPR and waste incineration BAT conclusions and regulated by the EA.

2.7.91 Where a proposed EfW plant or biomass generating station meets the requirements of the EPR and BAT conclusions and will not exceed the local air quality standards or adversely affect the delivery of the Environment Act 2021 PM<sub>2.5</sub> targets, National Emission Ceiling Regulations emissions limits or other statutory limits, objectives or targets, the Secretary of State should consider the proposed waste generating station as having acceptable impacts on health.”

“2.7.109 The Secretary of State should consider what requirements it may be appropriate to impose. If the EA has indicated that there are no known barriers to it issuing an Environmental Permit for operation of the proposed biomass/waste fuelled generating station and agrees that management plans suitably minimise the wider impacts from ash disposal, any residual ash disposal impacts should have limited weight.”

- 12.8 Consideration has been given to whether there are any aspects of emissions to air from the chimney would not be regulated by the environmental permit and therefore should be given further consideration by the WPA and if permission is granted, covered by planning conditions. CCC as the WPA does not have the technical expertise to assess emission monitoring data and would need to consult the Environment Agency to form an opinion on whether or not it showed compliance or otherwise with the limits that had been set. Unlike with noise (see section 14 below), the EHO is satisfied that for the operational phase the environmental permit would regulate emissions to protect the local community. CCC as the WPA has enough information before to be satisfied that the proposed development would, subject to the controls that would be in place through the environmental permit, be undertaken without causing harm to the human or natural environment environments.
- 12.9 Concern has been raised that a 44 metre high chimney will not be high enough for emissions to be adequately dispersed given the relative height of Warboys village and compared with other incinerator chimney heights. It would not be in Thermeco's interests to have designed the chimney without establishing what will be necessary to meet environmental permit requirements. If during the permit application process it is found that the chimney needs to be higher, an application to amend the planning permission would be required which would involve a new LVIA.
- 12.10 Concern has been raised about the impact of emissions from the vehicles delivering the feedstock and servicing the plant. As set out above in paragraph 9.20 the RDF would be sourced from the adjacent Woodford MRF which has the ability under the terms of its existing planning permission to significantly increase its throughput and therefore also increase vehicle movements whether or not the Thermeco development goes ahead or not. The number of vehicle movements directly attributable to the Thermeco development would be low (see paragraph 3.3 above) and even if the waste delivered to the Woodford MRF to create the RDF was taken into account (30 HGV movements per day), this is well below the indicative criteria for requiring an air quality assessment for vehicle movements (Institute of Air Quality Management 'Land-Use Planning & Development Control: Planning for Air Quality' January 2017).

#### Odour

- 12.11 The Site is in a rural area where odours related to agricultural practices may be experienced. Because of the seasonal nature of farming, these odours are unlikely to be continuous and to be tolerated by the local community as part of life in the countryside. Depending on the nature of the waste being processed and how it is handled and stored, odour from some waste management facilities may be similar to or distinct from agricultural odours. Where the waste management process is continuous, any odour generated could be too; where it would be experienced largely dependent on wind direction. Where the source of odour is known to be a waste management site, the perception of nuisance may be higher and tolerance within the community may be lower.
- 12.12 In their 'Consideration of Consultation Responses' (27/05/2025) the applicant has addressed the EHO's concerns and confirmed that:
- i) the RDF would be unloaded and stored within the building which will be under negative pressure with extraction emitted from the chimney; and

ii) the vehicles delivering the RDF from the Woodford MRF would fit within the fuel bays with the shutters closed.

For these reasons it is considered that the potential for the RDF itself to give rise to odour that would be experienced outside the site is low. The applicant has submitted an Odour Management Plan (Stopford 15/12/2022) as part of the ES which could be secured by planning condition if planning permission is granted. For these reasons it is unlikely that the development would give rise to unacceptable levels of odour.

## Dust

- 12.13 The applicant has submitted a Dust Management Plan (Stopford 15/12/2022) which identifies potential sources of dust during the construction and operational phases of the proposed development. As set out in paragraph 12.11 above, the RDF would be delivered and stored within a building thereby minimising the risk of fugitive dust. Vehicle circulation areas would be hard surfaced which would be easy to keep clean so not be prone to dust generation. The RDF delivery vehicles would use the hard surfaced access road between the Woodford RDF so be unlikely to pick up mud which when deposited causes dust in dry weather if not removed. For these reasons it is considered unlikely that the development would generate dust experienced outside the Site during the operational phase.
- 12.14 There is more potential for dust to be generated during the construction phase particularly during earthworks and site preparation. Mitigation techniques are well-known and widely practised; as stated in paragraph 6.6 above, the EHO considers that the applicant's CEMP should incorporate robust dust mitigation measures and this could be secured by planning condition if permission is granted.
- 12.15 The operation of the proposed plant would be controlled by an environmental permit issued by the Environment Agency. With appropriate mitigation in place secured by the environmental permit and by a CEMP and Odour Management Plan via planning conditions it is considered that the proposed development could be constructed and would be operated without causing unacceptable adverse impacts on air quality from point source (chimney) emissions, odour or dust so would comply with MWLP Policies 17 and 18, HLP policies LP10, LP14 and LP36 and NPPF paragraphs 187, 198 and 199.

## 13. Health

Relevant policies: NPPF paragraphs 198 & 201  
MWLP Policy 18  
HLP policy LP29

- 13.1 As stated in paragraph 12.1 above there is concern within the local community about emissions to air from combustion of RDF and their potential to harm health either directly through inhalation, or from deposition on land from where it may enter the food chain. For the reasons given in paragraphs 12.2 – 12.8 whilst the local community's concerns are wholly understandable, there is no evidence that the proposed development, subject to the appropriate environmental permit

restrictions, would give rise to adversely affect health as a result of emissions to air, including dust and odour.

- 13.2 Health covers more than air quality and HLP Policy LP29 requires 'large scale development' (defined as having a floor space of over 2,500 square metres or a site of 2 hectares or more) to be informed by the conclusions of a rapid health impact assessment (HIA). The supporting text recognises that not all topics within a standard rapid HIA will be relevant to all types of development. Thermeco submitted a HIA as part of the ES and which was updated as part of the September 2024 submission which was broadly accepted by the CCC Public Health Officer (see paragraph 6.21 above). They sought clarification on some points which was provided in the Consideration of Consultation Responses' (27/05/2025).
- 13.3 Disturbance from unwanted noise can have an effect on health. It is considered that with appropriate mitigation and compliance with the limit recommended by the EHO, noise from the proposed development would not be at a level which adversely affected the health of local residents. This is discussed in more detail in section 14 of this report.
- 13.4 Taking into account the comments from relevant technical consultees and the role of the environmental permitting regime it is considered that the proposed development would not result in actual harm to human health and well-being. It is acknowledged that in cases where there is no evidence of actual harm there can still be a perception of harm to health and well-being and this is reflected in many of the representations from individuals. Although perception of harm is not included in development plan policies, it is a material planning consideration which should be afforded some weight in assessing the proposed development.

## 14. Noise, vibration and light

### Noise

Relevant policies: NPPF paragraphs 198 & 201  
MWLP policies 17 & 18  
HLP policies LP10 & LP14

- 14.1 These policies seek to protect the occupiers of nearby land or property from noise and require development proposals to include mitigation where necessary. Owing to a lack of capacity within Huntingdonshire District Council's environmental health department when the planning application was first submitted, the WPA sought advice from an independent consultant, WSP, on noise. WSP's report dated 21 April 2023 raised questions about the methodology and conclusions in the applicant's noise impact assessment (NIA). A revised NIA was submitted in September 2024 with further revisions in May 2025. Comments on the 2024 and 2025 NIAs were provided by the EHO (see paragraph 6.4 above).
- 14.2 As set out in paragraph 3.4 the plant would operate 24 hours per day 7 days per week. Waste and ancillary materials would be received between 07:30 and 18:00 Monday to Friday and between 07:30 and 13:00 Saturdays. The closest noise

sensitive properties to the Site are Woodview, Old Railway Tavern, Wingate, Fenside Caravan Park and Dorrington's Farm and these have been the focus of the NIA. As stated in paragraph 3.5 above, it is proposed that a 3 metre high acoustic fence would be constructed along the along the northern edge of the access road. This would reduce the impact of the proposed development and of the traffic serving the Woodford MRF at the property Woodview.

- 14.3 The most affected noise sensitive receiver has been identified as the garden of Old Railway Tavern during the daytime. The property is situated at the junction of Fenside Road and Puddock Road and opposite the site entrance. At this location the predicted noise level is 34dB LAeq. The EHO considers that an acoustic correction for intermittency of 3dB should be added to this value to make a rating level of 37dB Lar but this was not followed through to the conclusions of the NIA.
- 14.4 The EHO had concerns about the noise generated from the proposed development itself and when combined with the noise from the Woodford MRF. The Woodford MRF has a predicted operational noise of 36 dB LAeq at Old Railway Tavern and the combined sound level would be 38dB LAeq (or 39.5dB if rated with a correction for intermittency of the noise). This is the same sound level as the existing background at Old Railway Tavern, so the noise would appear to double and would be clearly audible. In order to keep the background sound level at 38dB, the sound level emanating from the thermal treatment facility at Old Railway Tavern would need to be around 24dB LAeq. However, this may not be achievable, so it would be more reasonable to set a limit of 30dB LAeq at the Old Railway Tavern. In this way, the combined noise level from both operations would be 37dB LAeq, (1dB below the background level). Furthermore, modelling has shown that 30dB would be achieved at the other noise sensitive receivers.
- 14.5 The EHO recommended that if planning permission is granted, the following condition be imposed: "The specific sound level (operational sound) emitted from the site shall not exceed 30dB LAeq 1 hour free-field at any residential dwelling when measured in accordance with BS4142:2014+A1-2019." The applicant has challenged this for two reasons: first that it would be an unnecessary duplication of control because operational noise would be addressed by the Environment Agency in the environmental permit so would be contrary to NPPF paragraph 201, and second that the limit is too low and would require operational noise to be at least 8dB below the prevailing background level which is unjustified.
- 14.5 The EHO considers that the terms of the environmental permit may not be stringent enough to protect the rural environment and prevent "background creep" and maintains the advice that a noise limit planning condition is necessary. He has, however, reconsidered the noise limit. Modelling shows that the operations at Woodfords would produce 36dB LAeq 1hr and Thermeco would produce 34dB LAeq 1hr. The combined operations of Thermeco and the Woodford MRF would be 38dB LAeq1h (daytime). This is the same as the background sound level, and when the background sound is added, the overall sound level would be in the region of 41dB. This increase of 3dB would be noticeable to the residents of Old Railway Tavern (whilst in the garden) and would present "background creep". However, with Thermeco only contributing 2dB to this increase, it might be considered reasonable to allow this and set the noise limit at the predicted specific

operational sound of 34dB at the Old Railway Tavern. The recommended condition would be: "The specific sound level (operational sound) emitted from the site shall not exceed 34dB LAeq 1 hour free-field at any residential dwelling when measured in accordance with BS4142:2014+A1-2019 and/or its subsequent amendments."

- 14.6 Noise during the construction period needs to be taken into account. The EHO considers the proposed hours of 07:00 – 19:00 Monday – Friday (with no public holidays) and a maximum duration of construction work of 18 months to be acceptable. The EHO has reviewed the applicant's Construction Environmental Management & Traffic Management Plan (Issue A2 dated 13/05/2024) and whilst it is proposed to monitor construction noise, there is no indication as to how this will be undertaken either qualitatively or quantitatively and no reassurance that this will be made available upon inspection. There is no commitment to use broadband reversing sirens rather than tonal. Public consultation is mentioned but there is no commitment to installing a noticeboard at the site entrance with a helpline / contact details. For these reasons, if planning permission is granted, a revised Construction Environmental Management & Traffic Management Plan which addresses these points should be secured by condition.
- 14.7 For the reasons given in paragraph 14.5 above, it is considered that based on the EHO's advice, there is justification for deviating from the advice in NPPF paragraph 201 and that if planning permission is granted, it should be subject to the recommended noise limit condition. With a revised Construction Environmental Management & Traffic Management Plan also secured by condition, the proposed development would comply with MWLP Policy 17 and Policy 18, HLP Policy LP10 and Policy LP14 and NPPF paragraph 198 in respect of noise.

#### Light

Relevant policies: NPPF paragraphs 187 & 198  
MWLP policies 17 & 18  
HLP policies LP10 & LP14

- 14.8 The policies listed above seek to prevent unacceptable levels of light pollution. The Site is in a rural location with a low level of district brightness. The Site would operate outside daylight hours so external artificial lighting is necessary for exterior and interior processing and circulation areas. 32 x 6 metre high streetlights and 25 x 15 metre high floodlights are proposed (Figure 2 in the applicant's Lighting Impact Assessment - Stopford 15/12/2022) and would be designed to control the direction and intensity of the lighting to minimise light spill outside the Site. The Lighting Impact Assessment concludes that there would be negligible impact on sensitive receptors or the wider environment, the night sky. The cumulative impact with lights at the Woodford MRD has been taken into account.
- 14.9 The EHO has not raised any concerns about the impact of lighting on residential amenity; the HDC landscape officer has not raised any concerns about its impact on the night sky and the CCC ecology officer has not raised any concerns about the impact of lighting on wildlife. Notwithstanding the above, it is considered that if planning permission is granted, details of the external lights could be secured by condition. It is considered that with appropriate location, orientation and design the

external lights would not have a significant impact on residential amenity, the countryside or wildlife so the proposed development would comply with the relevant parts of MWLP Policy 17 and Policy 18, HLP Policy LP10 and Policy LP14 and NPPF paragraphs 187 and 198 in respect of light.

## 15. Water quality and resources and flood risk

### Water quality and resources

Relevant policies: NPPF paragraphs 187 & 201  
MWLP Policy 22  
HLP policies LP14 & LP15

- 15.1 These policies seek to protect the quality and availability of surface and groundwater resources. The Site is not within a groundwater source protection zone so is unlikely to affect public potable groundwater abstraction sites. It is close to three watercourses and the applicant proposes to discharge surface water into the IDB drain which flows from the northeast corner of the Site into the board's network of drains on Wistow Fen. There are three potential sources of pollution to surface water: oil or fuel spillage, leachate from the RDF and foul water. The following pollution prevention measures are proposed: an oil/water interceptor would be installed downstream of the Site's drainage system; the areas where the RDF would be held would be drained to a below ground tank within the plant which would be emptied and taken off site for treatment; and foul water from the offices and welfare facilities would drain via an underground system to a cess pit.
- 15.2 It is considered that these measures would minimise the risk of the development polluting ground or surface waters which will also be covered by the environmental permit. For these reasons it is considered that the proposed development would comply with the relevant parts of MWLP Policy 22, HLP Policies LP14 and LP15 and NPPF paragraph 187.

### Flood risk

Relevant policies: NPPF paragraphs 181 & 182  
MWLP Policy 22  
HLP policies LP5 & LP15  
Cambridgeshire Flood & Water SPD

- 15.3 These policies seek to prevent new development increasing the risk of flooding both within the Site itself and on nearby land. The Site and most of the adjacent field to the northeast is in the Environment Agency's flood zone 1 which is the least at risk of river or sea flooding. Beyond that, Wistow Fen is within flood zone 3. The area of the proposed development area is over 1 hectare therefore the applicant was required to submit a Flood Risk Assessment (FRA).
- 15.4 The Site currently has very little, if any, impermeable area. The proposal would result in approximately 60% of the Site requiring surface water to be managed: from the building roofs, roads and hardstanding and the bunded containment area. It is

proposed that all surface water from the Site would flow via a separator to the existing IDB ditch, a watercourse which flows in an easterly direction from the lagoons to the northwest of the Site. Flow limiting devices would be provided upstream of the separator with attenuation provided by an attenuation tank augmented by a long-term storage tank designed to cater for the additional flow arising from the greater area of impermeable surface due to the development. From the separator, surface water would discharge to the IDB ditch either via an existing ditch that runs parallel to the northeast side of the Site or via a lagoon, dependent on the outcome of a drainage survey of the Site. The lagoons and connections to the IDB ditch are not within the Site so would need to be subject to agreement with Woodford Recycling Ltd for their use and maintenance. The applicant acknowledges that permission for discharge to the ditch will be required from the Ramsey First IDB.

- 15.5 Although most of the LLFA's original reasons for objection (17 March 2023) have been addressed, as set out in paragraph 6.18 above, the applicant has not provided drainage calculations to indicate whether the system can cater for the 3.3% and 1% AEP storm events. For this reason, the proposed surface water drainage scheme does not meet the necessary requirements for approval should not be accepted. The proposed surface water drainage scheme depends on two factors which are not currently wholly within the applicant's control. First, the reliance on lagoons and connections outside the application area. If planning permission is granted this may need to be secured by a S106 planning obligation. Second, there is no guarantee that the IDB would issue a discharge consent. The applicant has stated (Consideration of Consultation Responses 27/05/2025) that they propose to apply for an 'in principle' agreement from the IDB.
- 15.6 Until the applicant has demonstrated to the satisfaction of the LLFA that the proposed surface water drainage scheme can accommodate the 3.3% and 1% AEP storm events the proposed development would not comply with the relevant parts of MWLP Policy 22, HLP policies LP5 and LP15 and NPPF paragraphs 181 and 182.

## 16. Traffic and access

Relevant policies: NPPF paragraphs 109, 110, 115 – 118  
MWLP Policy 23  
HLP policies LP16 & LP17

- 16.1 MWLP Policy 23 shares many of the aims of NPPF paragraph 115 and HLP Policy LP16 and states that:

"Mineral and waste development will only be permitted if:  
"(a) appropriate opportunities to promote sustainable transport modes can be, or have been, taken up, to the degree reasonably available given the type of development and its location. If, at the point of application, commercially available electric Heavy Commercial Vehicles (HCVs) are reasonably available, then development which would increase HCV movements should provide appropriate electric vehicle charging infrastructure for HCVs;

(b) safe and suitable access to the site can be achieved for all users of the subsequent development;

(c) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree;

(d) any associated increase in traffic or highway improvements would not cause unacceptable harm to the environment, road safety or residential amenity, and would not cause severe residual cumulative impacts on the road network; and

(e) binding agreements covering lorry routing arrangements and/or HCV signage for mineral and waste traffic are agreed, if any such agreements are necessary and reasonable to make a development acceptable.”

- 16.2 Thermeco’s original proposal was that up to 20% of the RDF feedstock would be obtained directly from the Woodford MRF although the Transport Assessment (Crowd Dynamics, Rev 02 17 November 2022) assumed a ‘worst case scenario’ with 100% of the feedstock from off-site sources. On that basis there would be 14 deliveries of RDF per day and an average of 1 HGV per day to deliver process chemicals and remove ash making a total of 30 HGV movements per day. A total of 26 staff would work shift patterns such that a maximum of 10 would be on site at any one time.
- 16.3 A large proportion of the representations received from local residents object to the proposed development on the grounds that the proposed route, Fenside Road, is not suitable for the number of HGVs that would be generated by the proposed development in terms of its structure and potential for conflict with other, particularly non-motorised, road users. There is also concern that the vehicles serving the Site would use Station Road and other roads within Warboys and nearby villages.
- 16.4 In September 2024 the application was amended so that the development is proposed on the basis that all of the 87,500 tpa RDF feedstock would be sourced from the adjacent Woodford MRF. The permanent Woodford MRF was considered in 2012 on the basis of a 160,000 tpa throughput which would generate 5 HGV arrivals (10 movements) per hour. Over a 10.5 hour working day (07:30 – 18:00 Monday to Friday) that would be 52.5 arrivals or 105 movements per day. Thermeco proposed that 87,500 tpa processed RDF feedstock would generate 14 loads per day.
- 16.5 Not all the unprocessed residual waste that Woodford would receive would be suitable for creating RDF therefore more than 87,500 tpa would be needed. According to the applicant, if a general waste stream were set up for maximising waste reuse and recycling and so removing waste plastic, wood, glass, textiles, organics etc as well as metal, then a recovery rate of 25 – 50% would be expected. This is consistent with the CCC Head of Waste Management who had advised that of 100 tonnes of ‘black bag’ waste 32 tonnes would be recyclable and/or non-combustible and 68 tonnes would be suitable to create RDF. Woodford would take pre-sorted residual waste and would not undertake any further recovery except removing metals and other waste not suitable for RDF. They would then shred and blend the waste to create RDF with a specific make-up and calorific value.

16.6 The applicant estimates that to produce the 87,500 tonnes RDF with only metal recovery (plus a few non-conforming wastes) would require approximately 90,000 tonnes of waste. This would generate approximately 30 HGV movements per day. The RDF processing would run alongside the existing skip waste business and the combined HGV movements would be considerably less than the 105 per day that the Woodford MRF 2012 application was assessed on.

16.7 Although the Woodford MRF has not operated anywhere near its permitted limit of 160,000 tpa there is nothing in the planning permission to stop a significant increase in throughput up to that limit. Woodford could therefore increase the throughput of their site within the terms of the existing planning permission and produce RDF for any end user whether or not the Thermeco proposal goes ahead or not. If the RDF were to go to Thermeco, only a small proportion of the incoming waste would need to use the public highway to go off site for recycling or disposal. If the RDF were to go to another end user, or if the throughput of the MRF were increased for any other reason, all the waste would need to go off site using the public highway.

16.8 MWLP Policy 23 states:

**“Use of HCV Route Network**

Where mineral and/or waste is to be taken on or off a site using the highway network, then all proposals must demonstrate how the latest identified HCV Route Network is, where reasonable and practical to do so, to be utilised. If necessary, arrangements ensuring that the use of the HCV Route Network takes place may need to be secured through an appropriate and enforceable agreement. Any non-allocated mineral and waste management facility in Cambridgeshire which would require significant use of the highway must be well related to the HCV Route Network.”

16.9 The Woodford MRF planning permission is subject to a S106 planning obligation that requires HGVs to use the A141 and Fenside Road to access the site and not Station Road and Puddock Hill which are subject to a weight limit. Thermeco have proposed that the HGVs serving their plant would also use Fenside Road. The A141 is an HGV Advisory Route on the Cambridgeshire Advisory Freight Map so that part of MWLP Policy 23 would be met.

16.10 A car park for 11 vehicles (including one for disabled users) and 3 EV charging stations would be located to the northwest of the office. A cycle shelter would be installed adjacent to the office. These facilities would be appropriate for the number of staff on site at any one time.

16.11 The advice of the highway authority is set out in paragraphs 6.14 and 6.15 above. Based on the Woodford MRF having the potential to significantly increase its throughput and therefore HGV movements whether or not the Thermeco proposal goes ahead or not, there is no sustainable highway safety or capacity reason to refuse the current application. The construction traffic would precede the increase in throughput of the Woodford MRF.

16.12 No public rights of way would be directly affected by the proposed development therefore the development would comply with the relevant part of MWLP Policy 23.

16.13 NPPF paragraph 116 states:

“Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, following mitigation, would be severe, taking into account all reasonable future scenarios.”

Taking into account the views of the CCC Transport Assessment Team and Highway Development Management Officer and for the reasons set out in paragraphs 16.4 – 16.7 above the proposal is considered to acceptable in highway capacity and safety terms and complies with MWLP Policy 23, HLP policies LP16 and LP17 and NPPF paragraphs 109, 110, 115 – 118.

## 17. Historic environment

Relevant policies: NPPF paragraphs 207, 216 & 218  
MWLP Policy 21  
HLP policy LP34

17.1 The Site’s relationship to designated heritage assets is set out in paragraph 2.3 above. Owing to the separation distances the proposed development would not have any impact on them. The Site had historical industrial uses which have been recorded as described in paragraph 6.17 above. The proposed development complies with NPPF paragraphs 207, 216 and 218, MWLP Policy 21 and HLP Policy LP34 in respect of non-designated heritage assets.

## 18. Flies, vermin & birds and litter

Relevant policies: MWLP policies 18 & 25

18.1 Concern has been raised that the RDF would attract flies. Although the RDF may contain some organic elements that would be attractive to flies, vermin and scavenging birds, it would be transported a very short distance from the Woodford MRF and be unloaded and stored within the building. It is therefore unlikely that the RDF would result in an abnormal number of flies or litter and would not be accessible to scavenging birds. The management of the unprocessed waste at the Woodford MRF before it is turned into RDF is a matter outside the scope of the planning application that is being considered.

18.2 Scavenging birds and very tall structures could be a hazard to aircraft. The Site is within a civil aviation safeguarding area where consultation with Cambridge City Airport is required for renewable energy development. Cambridge City Airport has raised no objection (see paragraph 6.23 above).

18.3 For the reasons given above, the proposed development would comply with the relevant parts of the MWLP Policy 18 and Policy 25.

## 19. Contaminated land

Relevant policies: NPPF paragraph 196  
HLP Policy LP37

19.1 NPPF paragraph 196 states that planning decisions should ensure that:

“a site is suitable for its proposed use taking account of ground conditions and any risks arising from land instability and contamination. This includes risks arising from natural hazards or former activities such as mining, and any proposals for mitigation including land remediation (as well as potential impacts on the natural environment arising from that remediation).”

HLP Policy LP37 has similar requirements.

19.2 Concern has been raised about the proposed development disturbing the landfill site which contains hazardous waste. As stated in paragraph 6.19 above, the Site had historical industrial uses which could have contaminated the land. The information provided by the applicant for planning permission H/5002/18/CW satisfied the Environment Agency that the Site does not present any significant contamination but considers that there is a risk of gas migration from the nearby landfill site and a planning condition was imposed which required the developer to undertake a gas risk assessment. The current applicant has provided information including ground gas modelling data that shows that no significant ground gas has been encountered over recent years. On the basis of this information, the EHO is happy that the development could take place with a design based on gas characteristic situation 1.

19.3 If planning permission is granted, the mitigation measures set out in the gas risk assessment could be secured by condition. With such measures in place, the development would comply with NPPF paragraph 196 and HLP Policy LP37.

## 20. Design and sustainable construction

Relevant policies: NPPF paragraphs 131, 135, 139, 161, 164 and 166  
MWLP Policies 1 & 17 and Appendix 3  
HLP Policies LP11 & LP12

20.1 The policies referred to above seek to ensure that new development is well-designed taking into account its location and informed by sustainability. Other than MWLP Policy 17, these policies are intended to cover a wide range of types of development so not all elements will be relevant.

MWLP Policy 17 states that:

“All waste management development, and where relevant mineral development, should secure high quality design. The design of built development and the restoration of sites should be sympathetic to and, where opportunities arise, enhance local distinctiveness and the character and quality of the area in which it is located. Permission will be refused for development of poor design that fails to take the opportunities available to achieve this.”

- 20.2 This is further developed in MWLP Appendix 3: The Location and Design of Waste Management Facilities which provides guidance specifically related to waste management facilities. In rural locations it recommends that the design of facilities should reflect the scale and design of agricultural buildings. The proposed turbine hall and fuel bay would be constructed with a steel frame with steel cladding coloured Olive green or similar and would be similar in scale and appearance to modern agricultural buildings in the area such as those at Wilsons Orchard Farm on Fenside Road and on Wistow Fen approximately 250 metres north of the Site. The proposed boiler building would be of the same construction and colour as the turbine hall and fuel bay but significantly larger in area and height. The office building would be of brick construction with timber cladding which would be similar to Woodford Recycling’s office building. Surface water drainage, landscape planting and parking are covered elsewhere in this report.
- 20.3 HLP Policy LP12 (j) requires that efficient use is made of energy, water and other resources and that non-residential development meets Building Research Establishment Environmental Assessment Method (BREEM) ‘Good’ standard as a minimum. A range of sustainable construction features have been described in the applicant’s Statement of Sustainable Design and Construction (Stopford 23/05/2024). These include solar panels on the office building; energy saving interior and exterior lighting; water saving fitments in the staff facilities; office built to at least BREEAM ‘Good’ standard; timber from Forest Stewardship Council sources; prefabricated elements and standard sizes to reduce waste; management of construction waste to maximise recycling; minimising use of PVC; low maintenance and durable materials.
- 20.4 It is considered that the apart from the scale of the boiler building and stack and lack of space for further landscape planting, the design of the proposed buildings and infrastructure is appropriate for their purpose and would comply with MWLP Policies 1 and 17 and Appendix 3, HLP Policies LP11 and LP12 and NPPF paragraphs 131, 135, 139, 161, 164 and 166 in respect of design and sustainable construction.

## 21. Other matters

- 21.1 It has been brought to the applicant’s attention that the Proposed Site Plan (drawing no. D6628-MP-0001 Rev A5) shows the solar panels within the Woodford site in the wrong location as shown in Figure 5 below where the Proposed Site Plan has been overlaid on an aerial photograph. The current application area has been drawn clipping the corners of a solar panel meaning the sheet pile retaining wall would need to be repositioned reducing the area for vehicle circulation within the

Site and potentially requiring the fire water tank and the condenser units to be relocated.



Figure 5 – application boundary and solar panels

## 22. Public Sector Equality Duties (PSED)

22.1 Section 149 of the Equalities Act 2010 places a statutory duty on all public bodies to consider the needs of all individuals in their day-to-day work, including those with protected characteristics. The protected characteristics under PSED are: disability, gender reassignment, pregnancy, maternity/ paternity, race, religion or belief (including non-belief), sex and sexual orientation. In May 2023, elected members of the Council agreed that those leaving care (care leavers) must be treated as having a protected characteristic. The assessment of the planning application has taken into account representations from individuals who have made reference to their respiratory and other health conditions. The Council, in the exercise of the planning functions, must have due regard to the need to the following aims in their decision-making: eliminate discrimination, harassment and victimisation and any other conduct that is prohibited by or under the Act; foster good relations between people who share a relevant protected characteristic and those who do not share it; and advance equality of opportunity between people who share a relevant protected characteristic and people who do not share it. Furthermore, consideration must be given to removing or minimising disadvantages suffered by people due to their protected characteristics; meeting the needs of people with protected characteristics; and encouraging people with protected characteristics to participate in public life or in other activities where their participation is low.

22.2 It is not envisaged that the proposed development would be likely to impact negatively or specifically upon any groups with protected characteristics and there would be no known implications of the proposal in relation to the council's PSED duties under the 2010 Act. Concerns have been raised from within the local population that people with pre-existing health conditions would be particularly vulnerable to any adverse impact on air quality. For the reasons given in section 9 of this report it is considered that the risk of impact on human health from emissions to air is low and would be controlled by the environmental permit.

## 23. Conclusions

### Principle and location of the development

23.1 It is considered that the proposed development would comply with broad Government and development plan policy aims to support the low carbon energy generation. It is considered that because this is Government policy significant weight should be given to it. The development would provide some employment and contribute to the local economy but it is considered that a little weight should be given to this.

23.2 For the reasons given in paragraphs 9.8 and 9.9 above it is considered that the capacity gap for treatment and energy recovery processes in the MWLP area is likely to be closed by the Medworth facility by 2031 and that MWLP Policy 3 scenario (a) cannot be met. The proposed development would only be able to meet Policy 3 scenario (c) for waste from within the Plan area that would otherwise be landfilled. The proposed development would be competing with the Medworth facility for the same waste and if both are developed is likely to result in over-provision of energy from waste capacity in Cambridgeshire. This could result in waste being transported over longer distances which is contrary to the proximity principle and the wider sustainability aims of the development plan. It is considered that significant weight should be given to this. The conclusions on MWLP Policy 3 (paragraphs 9.25 – 9.29) are that the proposed development would not meet either scenario (a) or (c) and that irrespective of compliance with Policy 4 it does not accord with Policy 3. It is considered that significant weight should be given to this.

23.3 Compliance with Policy 3 is dependent on compliance with Policy 4 which in turn states that "Proposals for co-location will not be supported if the benefits do not outweigh the harm when assessed against the wider policies of the Development Plan." Those wider policies have been considered in sections 10 – 20 of this report. The proposal has been put forward on the basis that all the feedstock would be sourced from the adjacent Woodford MRF. For the reasons set out in paragraphs 9.46 to 9.49 above, it is considered that the benefits of co-location would be small and subject to insecure contractual arrangements and therefore significant weight should be given to this. As discussed in section 10 of this report it is considered that the proposed development would have clear adverse landscape and visual impacts and as set out in paragraph 23.4 below it is considered that this should be afforded significant weight. It is considered that this harm alone would outweigh the small and insecure benefits of co-location with the Woodford MRF and therefore the

proposed development should not be supported on the basis of co-location. It follows that the proposal does not comply with MWLP Policy 4.

#### Visual impact and landscape character

- 23.4 For the reasons given in paragraphs 10.14, 10.15, 10.49 and 10.53 it is considered the proposed development would have unacceptable landscape and visual impacts which the proposed mitigation would not satisfactorily address. It is considered that significant weight should be given to this.

#### Air quality and health

- 23.5 The potential for harm from emissions from the chimney is a matter of great concern to the local community but for the reasons given in 12.2 to 12.10 above, it is considered that with an environmental permit in place, the development would not affect air quality to the extent that the human or natural environment is adversely affected. It is considered that moderate weight should be given to this.

#### Odour and dust

- 23.6 For the reasons given in paragraphs 12.11 to 12.15 it is considered that that odour and dust could be satisfactorily mitigated through the environmental permit and a CEMP for the construction phase. It is considered that a little weight should be given to this.
- 23.7 As set out in 13.4 it is acknowledged that in cases where there is no evidence of actual harm there can still be a perception of harm to health and well-being and this is reflected in many of the representations from individuals. It is considered a little weight should be given to this.

#### Traffic and highways

- 23.8 Second to emissions, the impact of the development on the local highway network and their users is of the greatest concern within the local community. For the reasons set out in paragraphs 16.4 to 16.7 and 16.13 above, the proposed development would be acceptable in highway capacity and safety terms. It would, however, generate construction traffic and a small amount of operational traffic. It is considered that a little - moderate weight should be given to this.

#### Designated sites, protected species and BNG

- 23.9 Natural England has raised no objections to the proposal in respect its impact on nationally designated sites which would also be taken into account in the environmental permit. There is no reason to believe that locally protected sites would be adversely impacted. The protected species (GCN) on the Site would be protected through a Natural England European Protected Species Licence. It is considered that moderate weight should be given to each of these factors.

23.10 For the reasons given in paragraphs 11.9 to 11.11 above, the proposal would not satisfactorily mitigate the loss of habitat or provide adequate BNG and it is considered that moderate weight should be given to this.

#### Noise and light

23.11 Based on the EHO's advice it is considered that subject to a noise limit condition and updated CEMP the development would not result in an unacceptable level of noise at sensitive receptors. It is considered that moderate weight should be given to this.

23.12 With appropriate location, orientation and design the external lights would not have a significant impact on residential amenity, the countryside or wildlife. It is considered that a little weight should be given to this.

#### Water quality and flood risk

23.13 For the reasons given in paragraphs 15.1 and 15.2 it is considered that the proposed development would be unlikely to adversely affect water quality. It is considered that moderate weight should be given to this.

23.14 For the reasons given in paragraphs 15.5 it has not been demonstrated that the proposed development is acceptable in flood risk terms. It is considered that moderate weight should be given to this.

#### Historic environment

23.15 For the reasons given in paragraph 17.1 above, the development would not impact designated or non-designated heritage assets. It is considered that the weight that should be given is insignificant.

#### Flies, birds, vermin and litter

23.16 For the reasons given in paragraphs 18.1 and 18.2 above, the development is unlikely to attract flies, vermin and scavenging birds or result in litter. It is considered that the weight that should be given is insignificant.

#### Contaminated land

23.17 For the reasons given in paragraphs 19.2 and 19.3 the impacts of landfill gas migration have been assessed and appropriate mitigation measures secured by condition. It is considered that a little weight should be given to this.

#### Design and sustainable construction

23.18 Apart from the scale of the boiler building and stack and lack of space for further landscape planting, the design of the proposed buildings is acceptable. It is considered that a little weight should be given to this.

## Planning balance

23.19 It is considered that there is enough information before the WPA to enable it to make an informed decision on whether or not the proposed development is acceptable in land use planning terms. The following judgements have been reached taking into account the effect of mitigation which could be secured by planning conditions or would be in place through the environmental permit.

23.20 It is considered that the following aspects of the development are positive and weigh in favour of the application being approved:

- The use of waste which cannot be recycled to generate energy (significant)
- Employment opportunities and contribution to the local economy (little).

23.21 It is considered that the following aspects of the proposed development are neutral:

- Impact on air quality on human health (moderate)
- Noise (moderate)
- Designated ecological sites (moderate)
- Protected species (moderate)
- Water quality (moderate)
- Odour (little)
- Light (little)
- Dust (little)
- Contaminated land (little)
- Historic environment (insignificant)
- Pests and litter (insignificant).

23.22 It is considered that the following aspects of the proposed development are negative:

- Proposed location not in accordance with MWLP Policy 4 or HLP policies LP10 and LP19 (significant)
- The facility would not fill a capacity gap for treatment and energy recovery processes and could result in over-provision of energy from waste capacity in the MWLP area and result in waste being sourced contrary to the proximity principle (significant)
- Visual impact (significant)
- Habitat compensation and BNG (moderate)
- Surface water drainage (moderate)
- Construction traffic and operational traffic (little - moderate)
- Perception of health impacts particularly from pollution to air (little).

23.23 The conclusions set out above are in respect of MLWP Policy 3 on the basis that the Medworth facility goes ahead and closes the capacity gap by 2031 as expected. If that argument is not accepted i.e. that it is not assumed that Medworth would fill the capacity gap, Thermeco's proposed development would fill some of that gap and be in accordance with MWLP Policy 3 scenario (a). However, as set out in paragraph 23.3 compliance with Policy 3 is dependent on compliance with Policy 4. For the reasons also set out in paragraph 23.3 it is considered that the proposed

development does not comply with MWLP Policy 4 so even if in accordance with scenario (a) cannot comply with MWLP Policy 3 as a whole.

23.24 The proposed development has been assessed against development plan policies and other relevant national policies and guidance. There are two factors that weigh in favour of the proposed development: the Government's general policy aims of supporting low carbon energy generation including energy from waste and this has been afforded significant weight in the planning balance and the creation of employment and contribution to the local economy which is considered to be a benefit that should be afforded a little weight. As set out in paragraph 23.21 above the majority of factors are, with mitigation where necessary, considered to be neutral, and mostly afforded moderate or a little weight in the planning balance. The factors that have been identified as being negative aspects of the proposed development include those that carry the most weight i.e. the lack of need in the context of MWLP Policy 3; location in respect of MWLP Policy 4 and HLP policies LP10 and LP19; and landscape and visual impact. Other matters that weigh against the proposal are the failure to satisfactorily mitigate habitat loss and deliver adequate BNG; the failure demonstrate that the proposed surface water drainage system would cater for 3.3% and 1% AEP storm events; the relatively small increase in traffic that would be generated by the Thermeco plant itself; and the perception of harm within the local community. It is considered that together these factors outweigh the positive and neutral aspects of the proposed development and that for the reasons set out in this report the proposed development is not in accordance with the development plan taken as a whole and that there are no other material considerations that indicate that planning permission should be granted.

23.25 It is considered likely that the LLFA's objection (paragraph 6.20) could be resolved and the development could become acceptable in flood risk terms in compliance with the policies referred to in paragraph 15.6. In those circumstances surface water drainage would move from being a negative factor in paragraph 23.22 to being neutral in paragraph 23.21. It is possible that the objection on the grounds of habitat compensation and BNG (paragraph 6.18) could be overcome and could become a positive factor with the weight afforded dependent on the amount of BNG that would be delivered. In this scenario the balance between positive, neutral and negative factors would change but it is considered that it would not change enough to change the recommendation given the weight afforded to the lack of need, location and landscape and visual impacts.

## 24. Recommendation

24.1 It is recommended that planning permission is refused for the following reasons:

1. The proposed development does not comply with Cambridgeshire and Peterborough Minerals and Waste Local Plan (July 2021) Policy 3 because it is likely to result in over-provision of energy recovery capacity within Cambridgeshire and Peterborough.

2. The development of a waste management facility of the proposed scale in the countryside is not supported by Cambridgeshire and Peterborough Minerals and Waste Local Plan (July 2021) Policy 4 and Huntingdonshire Local Plan to 2026 (May 2019) policies LP10, LP19 and LP35. The small and insecure benefits of co-location with the source of the feedstock do not outweigh the adverse landscape character and visual impacts of the proposed development.

3. The proposed development would have an unacceptable adverse impact on the character of the local landscape and have an unacceptable visual impact from recognised public viewpoints which cannot be satisfactorily mitigated so does not comply with Cambridgeshire and Peterborough Minerals and Waste Local Plan (July 2021) Policy 17; Huntingdonshire Local Plan to 2026 (May 2019) policies LP10, LP11, LP12, LP19 and LP31; and National Planning Policy Framework (December 2024) paragraphs 187 and 187.

4. The proposal does not adequately mitigate or compensate for the loss of habitat and biodiversity that would be lost as a result of the proposed development and would not deliver measurable net gain in biodiversity proportionate to the scale of development proposed so does not comply with Cambridgeshire and Peterborough Minerals and Waste Local Plan (July 2021) Policy 20; Huntingdonshire Local Plan to 2026 (May 2019) policy LP30; and National Planning Policy Framework (December 2024) paragraphs 187 and 193.

5. It has not been demonstrated that the proposed surface water drainage scheme would cater for the 3.3% and 1% Annual Exceedance Probability storm events so the proposed development could increase the risk of flooding and does not comply with Cambridgeshire and Peterborough Minerals and Waste Local Plan (July 2021) Policy 22; Huntingdonshire Local Plan to 2026 (May 2019) policies LP5 and LP15; and National Planning Policy Framework (December 2024) paragraphs 181 and 182.

24.2 It is recommended that, should planning permission be refused and the applicant subsequently appeal, officers engage proactively with the appellant to seek resolution of reasons for refusal 4 (biodiversity net gain and habitat compensation) and 5 (surface water drainage). If, during the appeal process, satisfactory evidence is provided to address these matters in full, it is further recommended that the WPA formally withdraws these reasons for refusal. This approach would reduce the scope of dispute at inquiry, thereby minimising costs and time for both parties, while maintaining the authority's position on the principal policy conflicts underpinning the recommendation for refusal.

## Compliance with paragraph 39 of the National Planning Policy Framework

The applicant did not seek formal pre-application advice but the WPA provided informal guidance on the scope of the environmental statement. Following submission the WPA worked with the applicant to ensure that the environmental statement met the requirements of the Town and Country Planning (Environmental Impact Assessment)

Regulations 2017. The applicant has responded positively to advice from the WPA and statutory and technical consultees and submitted further information that addressed some of the concerns raised. However the economic and/or social benefits of the proposal are not considered sufficient to outweigh its adverse visual impact and the proposed development would not lead to an improvement in the environmental conditions of the area.

## Source Documents

Link to the [Waste \(England and Wales\) Regulations 2011](#)

Link to the [Waste Management Plan for England \(2021\)](#)

Link to the [Overarching National Policy Statement for Energy \(EN-1\)](#)

Link to the [National Policy Statement for Renewable Energy Infrastructure \(EN-3\)](#)

Link to the [Energy from Waste A Guide to the Debate \(Defra February 2014\)](#)

Link to the [Residual waste infrastructure capacity note \(Defra 30 Dec 2024\)](#)

Link to the [National Planning Policy Framework \(December 2024\)](#)

Link to the [Cambridgeshire and Peterborough Minerals and Waste Local Plan \(July 2021\)](#)

Link to the [Huntingdonshire Local Plan to 2036 \(May 2019\)](#)