

Warboys Landfill Action Group

Betty Ball
1 Fenton Road, Warboys,
Cambs, PE28 2 SD
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Planning Application No H/5002/18/CW

Dear Sir/Madam

I wish to object to the proposed planning application for a CHP plant at Warboys Landfill Site on behalf of Warboys Landfill Action Group.

Owners and Operators

I have spent considerable time looking into the proposal and the background of both the applicants, Sycamore Planning Ltd, and the proposed owners of the site, Cambridgeshire Biomass Ltd and H2O Resources Ltd. CBL will own the wood burning and energy generation section and H2O will own the waste water (leachate) treatment section. The two processes are totally interlinked and being separately owned gives great concern. If anything goes wrong who will be responsible?

The proposed operators of the site are Silvertree Environmental Ltd who claim to be specialists in biomass CHP operations. They appear to have no history or experience in the field. The operation of such a site includes potentially hazardous materials and processes. I am convinced that none of those involved in the operation have relevant experience to give any confidence. All the companies are newly formed - CBL was incorporated only three months ago. The Warboys community could yet again be abandoned to the inexperienced and experimental procedures of those who choose to 'learn on the job'!

Many inaccuracies have been detected within the planning document as well as being at variance with information supplied to villagers. There are errors in numbers as in the predicted energy generated referred to later and inaccuracies in the chemicals to be used in treatment of the emissions. These add to the concerns of the village that the applicants do not have the knowledge and understanding of the processes they are asking to be allowed to operate.

Energy Generation - Renewable but NOT Low Carbon Energy?

The "Supporting Planning Statement", section 5.1.11 states:-

'The renewable energy generating capacity put forward by the proposed development represents an important energy contribution at the local level, and this, alongside the support for renewable and low carbon technologies weighs heavily in favour of the proposed development.'

In the applicant's supporting planning statement, section 3.0.3 he states:

'The Biomass CHP facility will ... generate 1.5MW of electricity and 16.5MW of thermal energy (heat). It is estimated that 1.2MW of electricity will be exported to the National Grid whilst 0.3MW will be retained to power the site operations.'

In the applicant's supporting planning statement, section 5.1.9 he states:

'... It is estimated that 1.2MW of electricity will be exported to the National Grid, which is enough energy equivalent to power 2,370 households per annum.'

In a letter sent to Warboys Diary, the village newspaper delivered door to door, Sycamore wrote:

'Renewable Energy'

'The Biomass CHP facility will process up to 144 tonnes of waste wood per day which would previously have gone to landfill. The 16.5MW of waste heat will be used to process up to 195 tonnes of waste water per day and 0.75MW of electricity generated will be exported to the grid. This contributes to Government targets for increasing energy from renewable sources and diverting waste from landfill.'

1.2MW or 0.75MW, which is it? Quite a difference! On Sycamore's figures 0.75MW is only enough energy equivalent to power 1,480 households per annum. Enough for only 75% of the population of Warboys.

Furthermore, of the energy generated, less than 5% equivalent will be as electricity exported to the grid (using the application figures) or 8% if the figures reported to the village are used. It is hard to trust the competency of the applicants with such discrepancies.

Some of the energy created burning the waste wood will be used evaporating the waste water (leachate), but most will be emitted as CO₂ through the 25metre chimney and cannot be claimed to be low carbon energy. The heat thrown out by the leachate evaporation process will have no use except to cause an increase in climate change. I can find nothing to explain just how much heat will be released into the local atmosphere, possibly causing local atmospheric changes.

Wood Burning Process

The claim is to burn 144 tonnes of chipped wood per day, or around 50,000 tonnes per year. The CHP plant proposes to take wood chippings from sources within 30 miles of the site. Is there that much wood needing to be burnt in this local area to require such a facility working full time into the future? Or would the range be extended at a later date increasing traffic pollution?

It is claimed that this process is non-hazardous yet the wood is to be categories B and C including paint and glue, which when burnt can cause harmful emissions. This risks the health of local people causing breathing problems and possible cancers.

In the applicant's supporting planning statement, section 5.8.5:

... *'A stack height of 25m (above local ground level) is proposed to ensure effective dispersion of residual emissions to the atmosphere.'*

I challenge the interpretation of local ground level as being at fen level. The chimney although 25 metres in height will be at the bottom of the hill and the top of the outlet will not be much higher than village level. The emissions have much more impact on the health of the village population than is implied.

Water Treatment Facility

I have looked throughout the 'Guidance for Treatment of Landfill Leachate' document produced by the Environment Agency and found no reference to the process of leachate evaporation proposed for the Warboys site. Not surprising as I believe this procedure is untested in this country.

However on pages 117 - 119 of part 2, the following excerpts concerned me.

'Point source emissions to air....

- 1. Abatement is used to clean what could be termed incidental emissions from the leachate treatment process. Abatement can be readily overloaded and become ineffective.*
- 4. The operator should identify the main chemical constituents of the emissions and assess the fate of these chemicals in the environment.*
- 6. Although unlikely to be a significant issue at the majority of leachate treatment plants, the operator should consider the need to minimise water vapour. In order to address local visual amenity issues which in severe cases can **include loss of light, fogging, icing of roads, etc. and which can also adversely affect the plume dispersion.** Ideally, therefore, the exhaust should be discharged at conditions of temperature and moisture content that avoid saturation under a wide range of meteorological conditions.*
- 10. The operator should maintain a plan for the reduction of emissions to air.'*

The proposal for the Warboys site is to rely totally on emissions of water vapour (plus possible contaminants) 24 hours a day/7 days a week. This includes all types of weather

throughout the year. I do not believe that the applicant has the experience to identify the breakdown of the emissions or their effects. In his application's supporting planning statement, sections 5.8.6 to 5.8.9, he brushes off the effects of emissions with the claim that they '*will be predicted to be insignificant*' or '*predicted to be of minor adverse significance, or less*'. Nowhere does he look at any measures or estimates of possible emissions, which does not give any confidence in his technical expertise.

It gives great concern that the effects of these emissions could affect local travel conditions with the potential to cause serious road accidents. It is too dangerous to take the risk with this untested and little understood scheme.

In section 5.8.5 He states:

'.... A stack height of 25m (above local ground level) is proposed to ensure effective dispersion of residual emissions to the atmosphere.'

This refers to the stack height from the wood burner. In the case of the leachate treatment the six chimneys are only 12 metres above the plant level. However the proposed site is well below the ground level of the village and its' primary school, reducing the effectiveness of the stack height, so the village is much more at risks from emissions

In his supporting planning statement, sections 5.8.10 he states:

'The emissions from the proposed installation are predicted to be insignificant at any designated ecological site within 10 km.'

It would be useful to have some measurement to support this statement and an observation on the effect on receptors (people!!) closer to the site.

The Huntingdon Local Plan (December 1995) states:-

CS34 "Mineral and waste management development will only be permitted *where it can be demonstrated that there would be no significant harm to the environment, human health or safety,*

I do not believe that it has been demonstrated that there would be no harm. Especially as there is no evidence from such an operation, as it has not been achieved or tested previously. The applicants use of terms '*only slight adverse impact or negligible*' are vague, unquantified and unjustified.

In the applicant's supporting planning statement, section 3.0.2 he states:

'... The waste water treatment plant will have the capacity to treat approximately 65,000 tonnes of waste water per annum, which for the purposes of this planning application (including the associated studies) will be primarily landfill leachate.'

If it is not all landfill leachate what else might be included? How much does the amount of unspecified material constitute?

In their presentation to the village and to Warboys Parish Council, the applicants were keen to state that the leachate would not be hazardous, in fact that no hazardous substances would be brought onto the site. However much of the Warboys landfill site contains hazardous material - normally accepted as being 250,000 tonnes of hazardous waste have been deposited in the site. How can we be assured that the leachate coming from that waste is not hazardous? How many of the other local sites will have leachate from hazardous materials?

Sycamore were written to and asked about the emissions control of the evaporators. The implication in the application is that only steam/water vapour will be emitted but local people are concerned about what else would be coming from the tall chimneys.

Sycamore answered with:

'We have the ability to sample but not control. Control (of leachate?) is handled at the front end of the process through waste acceptance criteria and the pre-treatment for the emission from the stack don't exceed the agreed limits.'

The contents of a landfill site do not come compartmentalised but in a cocktail. Are we to believe that they can predetermine the effects of this processing. What reassurance is the ability to sample not control? If you can't control it what is the purpose of sampling. We can have no faith in this situation.

Traffic Issues

Fenside Road is a rural, unlit, single carriageway road approximately 3 km long, with speed limit of 60 mph. Most of its length is no more than 4 metres wide, with passing places about 6.5 metres in width. It has no footpaths and grass verges. It is in very poor condition, with many potholes and deep ruts from the heavy goods vehicles using it regularly accessing the landfill site and the Waste Transfer Station. The edges are broken in many places and could cause lorries/vehicles to tip over especially when passing is necessary. Farm vehicles have to use this road as well as traffic to the landfill site. Several domestic residences are accessed only by this road. Puddock road is an access to the north which is also in a similar condition with much subsidence. There is a weight limit on Station Road access from the village preventing lorries to the site using it.

Lorries travelling from the Peterborough direction in many cases come via Ramsey and hence travel

through the edge of Warboys along Ramsey Road and Church Road up to the roundabout on the A141 and then back crossing the south end of the village via the Fenton Road roundabout. The roundabout off Church Road is quite tight for HGVs turning, so although it is forbidden, some

Access to Fenside Road is from the A141 which is a very busy and fast moving with solid streams of

the south which affects visibility of drivers on the A141 of traffic turning across from Fenside Rd. This means that slow moving, heavily laden HGV lorries will regularly be waiting for a gap in the traffic to exit. If turning towards Warboys from a standing start it will take time for them to manoeuvre and they will be a real hazard. Add problems of visibility in winter from fog or ice and it gives real concern for local people as well as the wider community.

I have read the letter of objection submitted by Guy McCallan and would like to support the findings of his investigation into the traffic issues on the road conditions, amount of traffic and the effect

Landscape Intrusion

The fen landscape is of course flat and mainly agricultural with no large buildings to intrude. Wind

farms of course are tall but graceful and I believe are accepted over a wide area of this region. The CHP building proposed will be a large block which will be out of place and will be seen from many miles away. The proposal will be above the low level of the fenland which will make it even

The Huntingdon Local Plan (December 1995) states:-

EN17 "Development outside defined village environmental limits and on unallocated land outside the built-up framework of the market towns will generally be restricted to that which is essential to the efficient operation of local agriculture, horticulture, forestry, permitted mineral extraction, outdoor recreation or public utility services"

EN25 "The District Council will expect that new development will generally respect the scale, form, materials and design of established buildings in the locality of the application site and

CS33 "Mineral and water management development will only be permitted where it can be demonstrated that it can be assimilated into its surrounds and local landscape"

This proposal is not in scale and is completely out of keeping with the area. Landscaping - trees/hedges - within the fenland cannot screen out this development. This proposal fails these criteria.

I note the applicant's Supporting Planning Statement" states:-

5.2.5 "The LVIA concludes that landscape impacts are predicted to be slightly adverse, with the possibility to create a negligible beneficial effect in time, through landscape mitigation

5.2.6 "The LVIA concludes that visual impacts are predicted to be slight adverse initially, with the potential for this to reduce to negligible adverse impacts, or even beneficial in places, with the implementation of mitigation proposals.

National Planning Policy Framework

Economic Benefits

The "Supporting Planning Statement", section 5.1.14 states:-

The NNPF is clear that Local Planning Authorities should "support economic growth in rural areas in order to create jobs and prosperity by taking a positive approach to sustainable new

The "Supporting Planning Statement", section 5.1.16 states:-

'Once constructed the plant will create eighteen new jobs; ... the majority of the new jobs will be of a highly skilled nature.'

The skills required for jobs at such a plant are unlikely to be present in the local population. This

would mean workers travelling from outside the area, with no public transport to the site,

The "Supporting Planning Statement", section 5.1.15 states:-

'The proposed development will deliver economic benefits to the local area twofold; via the initial construction of the plant together with the operation of the plant over a period of 25 years. The plant will be constructed over a 9month period with up to 100 contractors employed; during the construction period it is envisaged these contractors will benefit local businesses such as shops, restaurants and hotels.'

There are no hotels or restaurants in the village, so incoming workers will need to travel to find

We believe this application should not be a delegated decision but should be decided at a full meeting of the County Planning Committee where all parties can express their concerns and an open discussion take place before a decision can be made.

We object to this application for many reasons quoted and urge Cambridgeshire County Council to

Your faithfully,

Betty Ball

Betty Ball on behalf of Warboys Landfill Action Group.