

Warboys Parish Council

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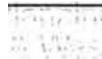
Ms H Wass,
County Planning Minerals and Waste,
Cambridgeshire County Council,
Box No. SH 1315
Shire Hall,
Castle Hill,
Cambridge. CB3 0AP.

My ref:

Your ref:

County Council
25 May 2018

23rd May 2018



Dear Helen,

Planning Application H/5002/18/CW for construction of a heat and power plant comprising biomass energy from waste (bed combustion) facility and treatment of waste water by evaporation treatment plant and associated infrastructure comprising tank farm, combuster 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.

The following comments are in addition to those contained in my letter dated 8th February 2018 setting out the Parish Council's objection to the above application. These comments are raised in the light of the further information provided by the applicants and which have become apparent since the original consultation period.

In your pre-application advice to the applicant, you wrote 'it is my opinion that subject to satisfactory design, it being demonstrated that the proposed plant can be operated without causing unacceptable adverse impacts on the natural environment (including the landscape or human health or amenity) the proposal could be supported. This is an officer view given without prejudice.'

There is nothing in the documentation submitted by the applicant and their consultants where they have demonstrated that the plant can be operated without causing unacceptable adverse impacts on the natural environment. Throughout the documentation submitted in support of the application, there is a continuous reference to the use of the word 'predicted'. As this is untried technology, it is highly questionable as to how accurate the modelling undertaken by the consultants can be. If this plant were to be built and the predictions prove to be inaccurate, it is inconceivable that the County Council would take enforcement action for breach of conditions or issue a stop notice. In the absence of any clear and demonstrable evidence that the plant can be operated without causing unacceptable impacts on the natural environment, it should be refused.

The Supporting Planning Statement (paragraph 3.0.2) states that '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'. The use of the word 'primarily' is incredibly vague. The dictionary definition of 'primarily' is essentially, mostly, chiefly, principally. That could be as little as 51 % or as high as 99%.

There is no explanation in the application and supporting documents as to where the balance of the waste water will be sourced if there is insufficient leachate to make the plant viable. The only fleeting reference is to compost run-off which is extremely pungent. Yet there is no attempt in the report dealing with odour to examine the types of waste water that will be accepted on site and the strength of the odours that may be associated with the different types of liquid. Indeed, the report almost anticipates that there will be complaints by stating in paragraph 6.1.2 'Typically any complaints received at the Facility are likely to be through the Environment Agency or Huntingdonshire District Council & Cambridge County Council, although the operator is willing to deal directly with the complainants'. It goes on in paragraph 7.4.1 to state that 'Any complaints received directly by the Facility or via the regulatory bodies, including the Environment Agency, Huntingdonshire District Council and Cambridgeshire County Council, will be recorded on the Odour Complaints Form and will instigate further olfactory monitoring at the location of the complaint and on site to determine the extent and location of the plume and the source of the odour will be identified.' This is hardly reassuring in the absence of any definition of the types of subsidiary

The repeated discrepancy in the reports as to the proximity of the nearest dwellings was mentioned in the Council's earlier letter. To repeat, the Supporting Planning Statement and Air Quality Management Plans state that the nearest properties are Wingate (240 metres), Old Railway Tavern (230 metres) and Woodview (170 metres). Whereas the Odour Management Plan and Dust Management Plan assess the distances at 140, 130 and 85 metres respectively. The latter are accurate and the County Council's own assessment of the Warboys site in the Minerals and Waste Plan states 'close to sensitive receptors – three properties within 200 metres'.

The Environment Statement explains that the applicant has engaged in a three stage site selection process before deciding upon Warboys. The final two sites considered at the third and final stage were Warboys and Fordham. In assessing Fordham, the report states that the closest dwelling is circa 20 metres from the site. As a result in assessing the impact on air quality the report states 'Proposed development may result in unacceptable disposition levels at dwellings'. In terms of noise, the report states 'Closest property circa 20m. from the site, consequently, likely to result in significant adverse noise impact'. In terms of landscape it states 'close to residential properties which may result in overbearing impacts'.

The Environmental Statement states that the closest property at Warboys is over 100 metres away.

That is incorrect. The closest property is 85 metres, with two others at 130 and 140 metres distant, plus a site with the benefit of planning permission for a touring caravan site which has been completely ignored in the application. It is inconceivable that the 'unacceptable disposition levels' and 'adverse noise impact' that would affect a dwelling 20 metres distant will be completely dissipated in a further

The Noise Assessment report submitted in support of the application contains some dubious interpretations of the level of noise emanating from the plant that can be heard at the nearest properties. It assesses some of the activities resulting in a noise level of up to 105 db(A) yet suggests that during the night when ambient noise is minimal, this will not be heard 85 metres distant at the nearest property. A number of the activities on site are examined in the report in terms of their noise impact but there is no mention of the peripheral impact of a 24 hour operation. In such circumstances, it would be usual for a three shift pattern of working – 2.00 p.m. to 10.00 p.m., 10.00 p.m. to 6.00 a.m. and 6.00 a.m. to 2.00 p.m. is the norm. There is likely to be disturbance at shift changeovers with the sound of vehicles, doors slamming, talking, etc. all of which will be audible from a distance

Finally, the Government have announced today stringent controls for emissions to air from wood burning stoves promising new measures to reduce air pollution. Those regulations have yet to be announced but it is clear that the Government acknowledge and have concerns about the effect on human health and the environment from the burning of wood. The prospect of 48,000 tonnes wood being burnt in such close proximity to dwellings and the village of Warboys itself is not reassuring for local residents.

Yours sincerely,

R&I.

Clerk