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# Woodhurst Parish Council

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CCC/21/088/FUL Application Response

15th September 2021

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## ***1. Introduction***

### **Woodhurst Parish Council strongly object to the application from enVar Composting Ltd, to develop their existing Waste processing site located at The Heath, Woodhurst, reference number CCC/21/088/FUL.**

The National Planning Policy Framework (NPPF) sets out the Government's planning policies for England and how these should be applied. It provides a framework within which locally prepared plans for housing and other development can be produced.

(NPPF para 7) The purpose of the planning system is to contribute to the achievement of sustainable development. At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs.

(NPPF para 2) Planning law requires that applications for planning permission be determined in accordance with the development plan unless material considerations indicate otherwise.

The following report details our objections to the proposal and are based on material planning considerations as required by the NPPF paragraph 2. These are: -

- Heritage
- Ecology & Biodiversity
- Lack of and misleading consultation
- The 'Need' for the development
- Traffic & Road Safety
- Environmental Amenity – Potential for Pollution; Noise & Light pollution
- The Rural Economy
- Risk & Disaster Avoidance

Throughout our submission we aim to show that the application by enVar does not meet the 'needs of the present' as there is no volumetric need for this additional incinerator and it will "compromise the ability of future generations to meet their own needs", be that through farming, attracting new generations to the area or damaging the heritage and outlook of all the surrounding picturesque villages, all of which contravenes the purpose of NPPF paragraph 7.

Woodhurst is the nearest village to the proposed development, with approximately 150 properties, many of which are in the Conservation Area at the Eastern end of the village.

## 2. Heritage

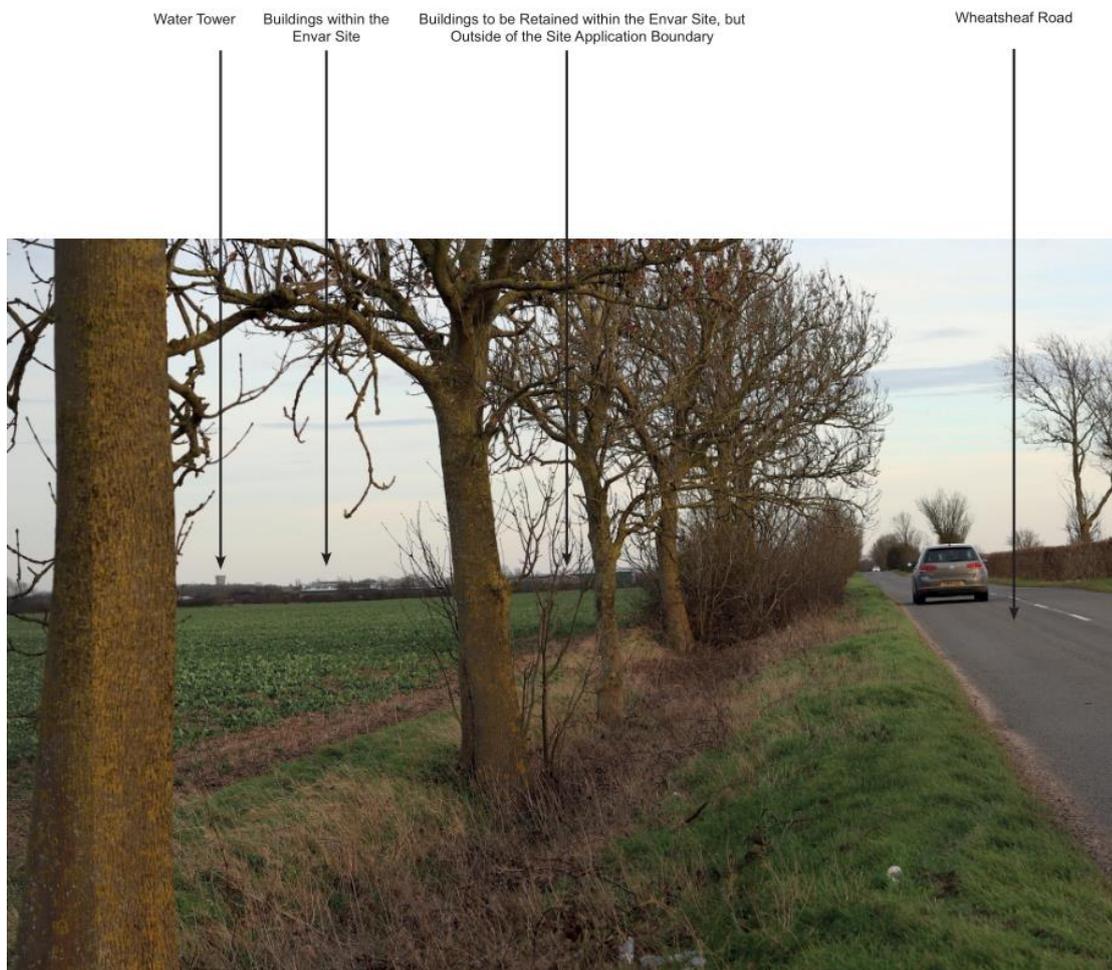
Woodhurst has been identified as a Roman site, with evidence of a settlement found during excavations of a site next to Wheatsheaf Road. It is cited as one of the finest examples of an Anglo-Saxon ring village and the Church there dates back to the 12<sup>th</sup> Century. Much of the of the village is in a Conservation Area and a number of private residences have listed status, as well as the Church.

Since the name of the village derives from the Saxon for “Wooded hill”, it enjoys a slightly higher profile than much of the surrounding countryside.

From footpaths within the village, it is possible to see Ely Cathedral across the fens. The increased size of the proposed buildings and the 26m chimney will have a detrimental effect on the character of the local area and will obscure the outlook from the conservation area, especially in Winter when trees are bare.

It was evident from the renders of the proposed site that none showed the chimney from the western side of the site. i.e. the view from Wheatsheaf Road as per the picture below (taken from application document Appendix 7 Viewpoint 9).

The water towers at Bluntisham are approximately the same height as the proposed chimney, but given that they are more than twice the distance than the proposed chimney, it is obvious that the Chimney will appear much larger when viewed from the edge of Woodhurst.



LP34 of the Huntingdon Local Plan to 2036, states the following with regard to Conservation Areas

**“A proposal within, affecting the setting of, or affecting views into or out of, a conservation area should preserve, and wherever possible enhance, features that contribute positively to the area’s character, appearance and setting as set out in character statements or other applicable documents. ”**

The current site is a mixed format site with the largest building being roughly 8M at ridge height. This proposal seeks to industrialise the existing composting site.

The proposal seeks to create a number of new buildings that are larger than this one building and will create a profile of industrial buildings in a rural setting which are not related or sympathetic to the surrounding landscape or buildings.

HWERF - Ridge Height 10M (32FT)  
HWERF Chimney height 26M (85FT)  
Pellet Fertiliser Plant height 11M (36FT)  
Waste Transfer Station height - 10M (32FT)  
Biomass Wood Chip Building 10M (32FT)  
Two Emergency Flares – unspecified height

All these buildings are within the same 2500SQM of the site and would create a density of buildings that would completely alter the visual impact of the site.

These buildings will have significant detrimental effect on the outlook from parts of the Woodhurst Conservation area and will also be visible from some of the listed buildings within the village, most notably Manor Farm.

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***We conclude that since the outlook from the conservation area will be affected by the view of a 26m chimney, that the Local Plan Policy 34 will be breached and that the scale and visual impact of the proposed development will be detrimental to the character of the village.***

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### ***3. Ecology and Biodiversity***

The NPPF paragraph 170 states

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

- **minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures”**

Paragraph 175 States

**“When determining planning applications, local planning authorities should apply the following principles:**

- **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”**

Effects on the bat population within Woodhurst of the Emissions and Light Pollution from the site should be investigated and reported.

Spotted Flycatchers are known to nest each year in properties at the Eastern end of the village and any effects on this rare species should also be investigated.

Other species are known to inhabit the farmland between Woodhurst and the proposed development.

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***Woodhurst Parish Council object to the application on that grounds that there is no report detailing any proposed net gain with regard to biodiversity and that further reports are required extending any ecological studies to include the wildlife in and around the village of Woodhurst.***

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#### **4. Community Involvement**

An integral part of any application of this significance is proper consultation with the local community in the area surrounding the proposed development. We believe enVar have failed to undertake the required consultation to support their application as follows

##### Breach of the principals of NPPF with regards to consultation

The guidelines for consultation are detailed in the Cambridgeshire Statement of Community involvement (CSCI) January 2019. In section 3.3 of the CSCI, it defines community stakeholders as a group that

**“includes individual or organisations that are interested because they live in the community the development will affect, for example interested individuals, local businesses and operators, developers, agents and landowners”.**

Woodhurst Parish Council acknowledge that the applicant has followed the statutory requirements, but we do strongly challenge the Statement of Community Involvement that accompanies the application. The level of engagement that has been carried out is unacceptable; no properties or Residents from within the village of Woodhurst were consulted directly by the applicant; no engagement was made with Woodhurst Parish Council (other than the liaison meeting mentioned below) before the application was submitted

We strongly challenge that the applicant hasn't met the requirements of Paragraph 39 of the NPPF which reads:

**39. Early engagement has significant potential to improve the efficiency and effectiveness of the planning application system for all parties. Good quality pre-application discussion enables better coordination between public and private resources and improved outcomes for the community.**

##### The unrepresentative sample area defined by enVar for public consultation.

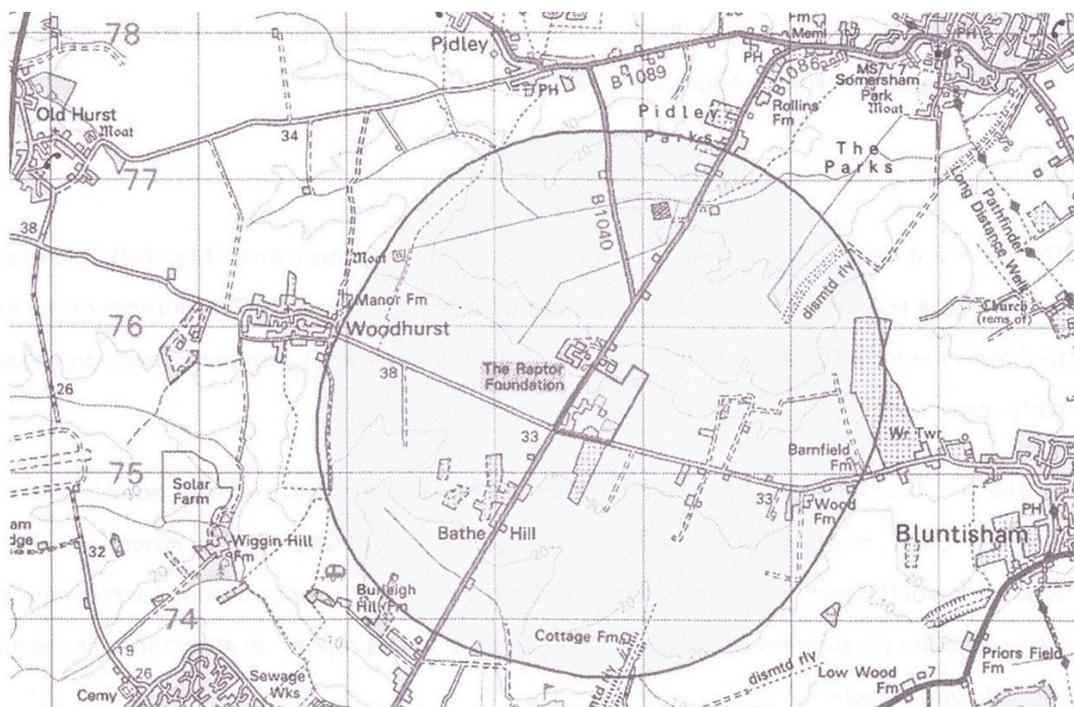
The first pre application advice was sought in July 2020 with Cambridgeshire County Council and yet the first mention of the proposal publicly was made by enVar at their Liaison Meeting on 10th May 2021.

Looking further at the applicants Statement of Community Involvement. The consultation period ran for 18 days. From May 11th to May 28<sup>th</sup> 2021.

Section 1.5.1 of the applicant's community involvement statement reads **“the applicant sought advice from Cambridge County Council as to the reasonable geographical scope of the distribution of the consultation leaflet, Cambridgeshire County Council advised the consultation should comprise of the three local villages; Woodhurst, Bluntisham and**

## Somersham"

This is a population of 6,607. As depicted on the map provided by the applicant the area consulted on does not at include any of the built-up areas of any of the villages that would be affected by the development as recommended by Cambridgeshire County Council.



In total 24 properties were leafleted, none of which were in the village of Woodhurst.

From the diagram above the consultation area appears to have been "flattened" to remove Woodhurst and Bluntisham. Some of the nearest properties to the proposed development (Manor Farm, Horseshoe Cottage) are mentioned specifically in the application because of their listed status, yet they were not part of any consultation.

A website set up by the applicant to give more "detail" prior to the application (<http://www.regenerationwoodhurst.com/>) was supposedly set up to allow for local consultation. A survey contained within the website was answered by nine (9) respondents. 4 people from Woodhurst responded to the survey.

Approximately 300 adults live in Woodhurst.

This is because enVar did not publicise this website or survey in any way to local residents other than in the liaison meeting below. No mention of it was made in the local press, and a search for "regeneration woodhurst" online only produces the enVar site itself and no other results. It would be reasonable to expect such a website to be published in the local press, or for details to be publicised locally by the applicant.

Considering the recommendation by Cambridgeshire County Council was to consult with 6,607 residents on the application, 0.36% or 24 properties we feel is a breach of these recommendations and at 0.36% isn't 'good quality pre-application consultation' and therefore is contrary to Paragraph 39 of the NPPF July 2021.

### Information provided for consultation is misleading

See Appendix 1 – Minutes from the enVar Liaison Meeting.

(These minutes have been generated by enVar and have not been approved/agreed by anyone outside the organisation attending the meeting, including Woodhurst Parish Council).

A healthcare energy recovery facility was mentioned, but the minutes make no reference to the building of an incinerator or of a 26m Chimney at the site.

The liaison meeting was held virtually due to the pandemic, and the overhead diagram of the proposed site was shown on screen as part of that meeting, but no other diagrams or renders were shown.

The information provided by enVar for the consultation doesn't comply with paragraph 43 of the NPPF. The framework is very clear here; the 'right information is crucial to good decision-making'.

The information provided by enVar isn't right, they never mention the incinerator, so how can members of the public be able to consider the full implication of the application and the impact it will have on them without the right information.

enVar did eventually hold a series of events over 3 hours on 8<sup>th</sup> August to answer questions regarding their application.

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***The council concludes that throughout all the community engagement by enVar, clear and detailed information has not been provided and that the number of people consulted does not meet the minimum requirements to make it an informed sample.***

***Woodhurst Parish Council request that the data included in this statement of community involvement be removed from the application and that the applicant be required to undertake a further full consultation with all households in Woodhurst and surrounding villages as was the advice from Cambridgeshire County Council***

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## **5. Need**

The council do not dispute that there is a need for clinical waste management or the composting process currently carried out by the applicant.

However, this need does not automatically mean that there is a capacity gap in clinical waste incineration. The applicant states in section 1.1.4 of their planning statement "With healthcare waste being sourced from the wider Cambridgeshire and Peterborough area" - this statement from their application would indicate that this is the only area that they are looking to use as sources of healthcare waste.

The Cambridgeshire and Peterborough Minerals and Waste Local Plan 2036, which was adopted in July 2021 identifies the same area and the Minerals & Waste Local Plan is what this application needs to be assessed against with regards to the 'need'.

In Section 5.2 of the M&WLP it states

***"This Plan does not allocate any sites for future waste management development. An up-to-date Waste Needs Assessment prepared alongside this Plan did not identify any capacity gaps which justify the allocation of sites."***

Section 3.41 the M&WLP also states

***"No site specific allocations for new waste management facilities have been identified in this Local Plan given the following factors: the indicative future waste management needs of the plan area (to achieve net self-sufficiency) are comparatively low; the potential for the existing material recycling capacity to be greater than captured; other recovery capacity associated with permitted but not operational sites considered likely to come forward in the near future; and that hazardous wastes are generally produced in lower quantities and managed at a wider scale."***

Currently in the area covered by the Minerals & Waste Local Plan we benefit from the clinical waste incinerator at Addenbrookes Hospital in Cambridge, which under permit number WP3935SM has permission to currently incinerate 4,500 tonnes annually (ref <https://questions-statements.parliament.uk/written-questions/detail/2018-12-03/198204>)

Using publicly available data from the Environment Agency Waste Data Interrogator we can see that in 2019 the total tonnage of clinical waste incinerated at Addenbrookes was 2294.1 tonnes. This includes waste accepted from outside of Eastern England (West Midlands, East Midlands, South West).

From the data provided it therefore suggests that Addenbrookes already has surplus capacity. Not all waste generated in this the region is incinerated at Addenbrookes, but at other sites in the UK dependent on the contractor that the relevant NHS trust works with.

The M&WLP recognises that waste currently moves across county and regional lines, section 3.34 of the plan states –

**“Waste movements occur as a result of commercial, contractual and operational arrangements as well as geographical convenience”**

The movements are part of the contractual arrangements that are already existent, and these contracts are not linked to the M&WLP in anyway.

The M&WLP states in section 3.5

**“... areas that historically and presently have a net import of waste (such as the Cambridgeshire-Peterborough plan area) should see such net imports significantly reduced.”**

This would suggest that given the existing spare capacity at Addenbrookes, as the net imports of clinical waste reduce, there will be even more spare capacity readily available in the region, without the need for a further incineration facility.

It is pertinent to point out that the incineration of Clinical Waste is operated via a permit system and is a large-scale commercial enterprise and covered by long term contractual agreements. enVar do not currently operate in this area and would be new to the market.

The enVar application claims that Clinical waste would only be sourced from the local area covered by the M&WLP and this plan makes clear that there is no capacity gap and the data from the EA would suggest that there is excess capacity both locally and regionally, again raising the question where is the need for the additional capacity suggested by enVar.

The Clinical Waste Need Initial assessment provided as part of the application suggests that there is a need for clinical waste, based on the current reception weight of EWC Chapter 18 waste in the East of England. EWC 18 is Healthcare Waste, and sub chapter 18 01 includes Human waste, including body parts. enVar representatives at the open events on 8<sup>th</sup> August 2021 confirmed that no body parts will be incinerated as part of the proposed development.

This would suggest that the report into clinical need is flawed as a proportion of the currently accepted clinical waste in EWC 18 would NOT be acceptable to the enVar site and so should not be included in their need assessment.

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***Woodhurst Parish Council therefore concludes that any application based on need is not valid and that the data in the M&WLP that there is no Capacity Gap backs up that conclusion.***

***In addition, the reports regarding clinical need commissioned by enVar are flawed and at odds with information given by enVar themselves.***

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## **6. Traffic and Road Safety**

The application does not seek to create a new site but to develop the existing site where they currently operate. This site sits at Wheatsheaf Crossroads, which is where the Heath Road from Bluntisham and the Wheatsheaf Road from Woodhurst meet with the busy B1040 St Ives to Somersham Road.

This is a known accident blackspot and is recognised as one of the most dangerous junctions in the Huntingdonshire district. In November 2019 three people lost their lives and 20 were hospitalized after an accident at the junction, and in October 2020 there was another fatality at this site. The Transport statement that accompanies the application makes a passing reference to the dangerous nature of this junction.

It references the Cambridgeshire County Council accident data which was collected prior to the most recent fatal accident at this junction

<https://data.cambridgeshireinsight.org.uk/dataset/cambridgeshire-road-traffic-collision-counts>

In 2020 Cambridgeshire County Council in partnership with Huntingdonshire District Council allocated funding to make long overdue improvements to this junction. The funding from HDC is dependent on this improvement taking the form of traffic lights at the junction <https://www.huntspost.co.uk/news/local-council/bluntisham-junction-gets-funding-for-improvements-7837594>. This has recently been ratified by the Transport Committee at Cambridgeshire County Council.

The transport report makes no reference to the junction improvements and how this critical safety measure affects ingress and egress at this site. No development that may impact on these critical changes should be considered. Policy 23 of the M&WLP makes it clear that permission can only be granted "*if safe and suitable access to the site can be achieved for all users*" - The changes to the junction combined with the changes to the layout of the site will mean that the potential to block the road with vehicles queuing and crossing to access the site has not been properly assessed and could potentially result in reducing the much sought after improved levels of road safety at this junction. The main entrance to their development is only 321m from the summit of the blind hill as you approach from Somersham, cars travelling at 60mph would cover that distance in less than 11 seconds, with the additional slow-moving HCV's both entering and leaving the site, the prospect of further high impact collisions would only increase, none of this has been modelled or even acknowledged in the transport plan.

The plan also seeks to build a new staff car park which is accessed from the Heath Road that leads to Bluntisham. This car park design creates spaces for 80+ vehicles, most of whom will access the site via the Wheatsheaf crossroads junction. Again, this has not been mentioned within the application. The new traffic lights proposed are based on current traffic 'am' and 'pm' peak numbers, the queue lengths in all directions have been analysed to ensure stationary traffic doesn't present a further hazard due to the restructured sight lines on the B1040 coming from both directions. The additional 80 cars going to work at enVar and their impact both in the 'am' and 'pm' direction hasn't been modelled and these extra vehicles may now make the 'traffic light control' option unviable due to the additional stationary queue length

they would form.

Section 4.7.2 states there will be no increase in traffic over and above the existing HCV movement of 120 in and out each day (240 in total). The application claims that existing HCV movements would be diverted to the HWERF from the current green waste input so that the existing planning restriction of 135,000 tonnes of input will not be breached (a 200,000 tonne overall throughput is currently allowed in total for the site)

However, enVar have stated in their "open meetings" that there will be a number of Vans/LGV (up to 3.5t each) "equivalent to 3 HCV per day". Since an HCV can be up to 44 tonnes, this can conservatively be estimated at 66 movements in and out of the site per day by smaller vehicles/

Woodhurst is controlled by a 7.5t weight limit zone, which should prevent HCV vehicles from travelling through the village. The Council acknowledges that enVar have previously been very conscious of that restriction.

However, with such an increase in the number of LGV/van deliveries which are not covered by the weight limit zone, these vehicles would be able to access the site through the village of Woodhurst, as they would be within the weight restrictions of the village.

The only access to the proposed development site from Woodhurst/A141 is via Wheatsheaf Road which starts in the Conservation Area. If deliveries are coming from Cambridgeshire and Peterborough, it would not be unexpected for vehicles to be accessing the site this way.

In the M&WLP policy 26 Traffic and Highways it references the use of the HCV Route Network. This means that all access from St Ives comes via Harrison Way/A1123 and B1040. There are known traffic issues in St Ives and in 2020 the St Ives Traffic Survey was launched and known problems were highlighted

<https://www.cambridgeshire.gov.uk/residents/travel-roads-and-parking/transport-funding-bids-and-studies/st-ives-transport-study>.

This study concluded that "The assessment identified that it was not possible to support additional growth at Gifford's Park with localised improvements alone, due to network capacity issues, especially at Junction M (A1123 / B1040 / A1096 Junction) and along the A1096 Harrison Way. Consequently, further investigation needs to be undertaken to identify a strategic intervention to bring significant improvement to St Ives and enable the delivery of additional growth in St Ives" -

This proposal would create additional vehicle movements which the current road infrastructure cannot accommodate now.

Further strain will be put on the local road network with the recent approval of the planning application at Haddenham which will mean another 80 movements along the A1123 through Bluntisham and St Ives. The planning application reference E/3003/18/CM condition 17 allows for 100 HGV movements per weekday & 50 on Saturdays.

enVar also haven't undertaken an assessment of the increased vehicle movement on the surrounding infrastructure outside of the immediate road network.

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***Woodhurst Parish Council concludes that the applicant has not assessed the impact and the safety hazards that an increase in LGV and HGV traffic caused by the proposed development would present on the new road layout and surrounding areas or the 80 cars that will now be using the proposed side entrance.***

***In addition, an increase LGV & Van deliveries is likely to have a profound effect on the traffic cutting through Woodhurst.***

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## ***7. Environmental Amenity : Potential for Pollution***

It is clear that members of the council are not qualified to fully assess the technical data and reports that accompanies this application. However, Woodhurst Parish Council has serious concerns over the potential air-quality degradation due to this development.

The health of our residents and protection of the environment are a major part of the objection to this application.

The application acknowledges that emissions from the 26m chimney will include dioxins and furans, and the Health Impact Assessment suggest that the amount of these toxins will be within the levels known as Tolerable Daily Intake (TDI) for Dioxins. The European Food Safety Authority have recently lowered their recommendations for a safe level of TWI levels.

Section 6.7.18 of the planning statement states that the level of impact is *"likely to be small and unlikely to result in a significant threat to people living and working nearby"*.

However this is still more likely after the proposed development than it currently is.

Paragraph 174 of the NPPF states

*(e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality,*

The applicant acknowledges that there is a real pollution threat from the HWERF, in the Health Impact Assessment paragraph 3.1 it states:

*"Any increases in dioxin concentration in the soil has the potential to transfer to the food chain"*

In the M&WLP objective 5 "safeguard productive land" states:

*"Minimise soil contamination and safeguard soil quality and quantity"*

By their own admission the applicant confirms that there is potential for soil contamination.

It is known that there exists a danger that dioxins can enter the food chain. This site is surrounded by arable land and livestock farms as well as other existing agricultural businesses that contribute to the rural economy and serve local residents. These will all be impacted by this proposal.

Objective 12 of the M&WLP clearly states that a major objective of the plan is to "minimise air pollution". This application, despite its claims to green credentials will create air pollution via emissions that do not currently exist.

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***Whilst Woodhurst Parish Council acknowledge that emissions from the development are set and monitored at national level by the Environment Agency, the surrounding area provides food and produce in great abundance.***

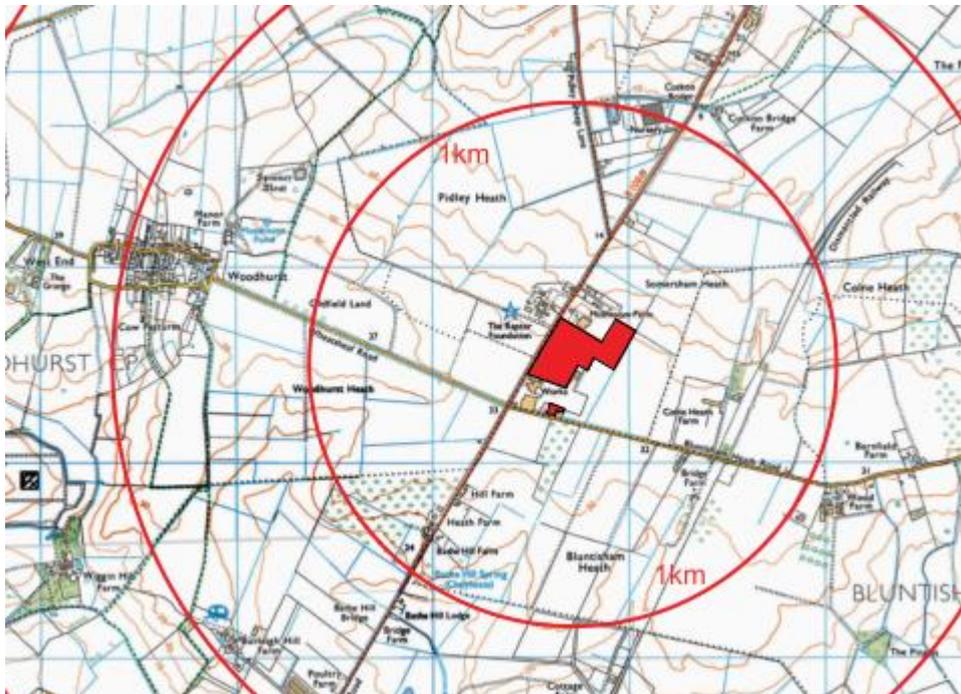
***With the potential for increased levels of Dioxins and Furans entering the food chain both directly through local produce and by arable crops, it is clear that this is in breach of the M&WLP***

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## **8. Environmental Amenity : Noise and Light**

The application acknowledges that noise will be an issue with the application and states within the application that this noise can only be mitigated once the facility has been constructed.

The facility will operate 24/7/365 and the proposed incinerator will require feeding throughout the hours of operation. The planning statement in 4.5.54 describes how waste will be stored and moved from the Waste Transfer station, this will mean that vehicles will be operating on the site constantly regardless of any restrictions on vehicle movement to and from the site. These vehicle movements combined with the noise of the operation will result in a constant level of noise even without the traffic noise from created by vehicles entering and leaving the site.



This 24/7 activity will mean that the site needs to be constantly lit, both to allow operation and site safety. This will affect the local amenity of all those that live in the immediate vicinity as well as having a detrimental effect on local wildlife.

Paragraph 185 of the NPPF is clear about what needs to be assessed with regards to noise and light:

**185.** *Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development. In doing so they should:*

*(a) mitigate and reduce to a minimum potential adverse impact resulting from noise*

*from new development – and avoid noise giving rise to significant adverse impacts on health and the quality of life;*

*(b) identify and protect tranquil areas which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason; and*

*(c) limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes, and nature conservation.*

*Policy 18 of the M&WLP states "New development must not result in unacceptable adverse impacts on the amenity of existing occupiers of any land or property, including:*

*(a) risk of harm to human health or safety.*

*(b) privacy for the occupiers of any nearby property.*

*(c) noise and/or vibration levels resulting in disturbance.*

*(d) unacceptably overbearing.*

*(e) loss of light to and/or overshadowing of any nearby property.*

*(f) air quality from odour, fumes, dust, smoke, or other sources.*

*(g) light pollution from artificial light or glare.*

The council maintain that the application can do nothing other than have an adverse impact on the amenity of existing occupiers of any nearby homes and land.

Woodhurst is a relatively dark village and therefore light pollution is currently minimal. On winter evenings a glow can be seen from the existing site. This will be increase significantly with 24-hour operation.

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***Woodhurst Parish Council concludes that the application should be rejected because noise and light pollution from the site will breach both the NPPF (para 185) and the M&WLP.***

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## **9. The Rural Economy**

The application makes great claims to the level of economic growth this development will bring to the local economy and the council strongly dispute this claim. The Pre application advice from CCC states on page 2 of 16 "*around 8 fulltime jobs would be created*".

The local area benefits from high levels of employment and an additional 8 new full-time posts will not have any impact on the rural economy. The council argues that this proposal would reduce employment at existing rural businesses as the threat to their livelihoods is considerable - be that via perception, visual impact, or the effect of reduced air quality via emissions from the incinerator.

Woodhurst is still a largely agricultural village with working arable and livestock farms. Arable fields are to be found on both sides of Wheatsheaf Road between the village and the proposed development and indeed surround the village. Emissions and pollution from the development site will have an effect on the crops produced.

The quality of the land will be reduced, this is counter to Objective 5 of the M&WLP "*Safeguard Productive land*".

The application, within its Health Impact assessment seeks to disguise the amount of food production that takes place in the area, in section 3.3

It states:

*"The majority of the general population purchase their fruit and vegetables from commercial outlets that **are likely to** source their produce from outside the locality. Unless a substantial proportion of fruit and vegetables sold are produced locally, the overwhelming majority of the local population's exposure to Dioxins due to consumption of fruit and vegetables will not be affected significantly by the operation of the proposed HERF.*

*People who consume fruit and vegetables grown within the vicinity of the facility may be exposed to marginally higher levels of Dioxins as a result of the operation of the process, although any increase is likely to be small. Whilst recognising the agricultural nature of the local area, the likelihood of individuals obtaining almost all of their fruit and vegetable consumption from gardens or allotments in the vicinity of the development site **is likely to be** low. Nevertheless, Dioxin intake via the consumption of fruit and vegetables is included in the assessment as the situation could change in future."*

The local population benefit from living in an area where fruit and vegetable production are prevalent and do purchase directly from these existing establishments - this acknowledgement of higher levels of dioxins will affect our food producers and will force those that buy locally to go elsewhere, increasing food miles.

The HIA goes on to say:

### **Consumption of Meat and Eggs**

*"Free-range animals and poultry may be exposed to Dioxins through consuming forage or grain, or soil ingested with food picked up from the ground. Dioxin exposure of poultry could also impact the level of Dioxins in eggs. **It is not known** if the rearing of meat or poultry occurs to a significant level in the vicinity of the development site.*

*However, this assessment **assumes** that the consumption of locally sourced meat and eggs does occur. Although calculations consider the rearing of beef, pork and poultry, **it is assumed** that only one of the three meat types will be consumed each day, and the most significant contributor to Dioxin intake is therefore subsequently included in the total exposure calculation.*

The Colne Heath Farm has over 25000 free range hens and is within 500M of the proposed site.

Many Woodhurst residents buy their eggs from this local producer and other produce from local fruit farms. There are also a number of private orchards within Woodhurst itself, which may also be affected. A number of residents also have their own hens and grow their own vegetables.

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***It is remiss of the applicant to make such statements regarding the production, purchase and consumption of meat, eggs, fruit and vegetables based on assumptions and guesswork.***

***The Council concludes that the proposed development is more likely to harm the local rural economy by affecting local food production rather than providing a boost by the production of 8 jobs***

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## ***10. Risk and Disaster Avoidance***

The council feel that the density of the site and the nature of the proposed operations contain significant levels of risk.

By their nature these facilities bring with them serious levels of risk and the potential for serious accidents and potential disasters that will have an impact on the surrounding area.

The application contains very few references to safety considerations. Section 4.9 made up of two paragraphs one that refers to the installation of fire detection equipment and the other relates to the location of the fire water tanks.

It is understood that not all of the Methane captured on site will be fed into the grid as "clean gas" and that at some stage all enVar vehicles will be powered by this methane, although there is also no timescale for the conversion/replacement of the enVar fleet to use Biogas.

It is not clear from the application exactly how much methane will need to be stored on site for powering vehicles nor does it reference in any detail what safety measures are in place to prevent leakage or contamination.

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***Woodhurst Parish Council object to the application on the grounds that there is not enough detail on safety policies and that any gas-based accidents at the site could have a significant impact on the village. We are also very concerned about other contamination/pollution caused by faults and or human/error in the exhaust processes.***

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## **11. Conclusions**

Throughout this report and based on material planning consideration as required by the NPPF paragraph 2 we have demonstrated that the applications for planning permission should not be approved as the material considerations we have raised indicate otherwise.

To summarise these material considerations: -

1. Woodhurst has a farming heritage which dates back before the enclosure act of 1802 and settlement sites that can be traced back to Medieval and Roman times.

It is a designated Conservation Area and this development will affect both the outlook and potentially the nature of the village. Woodhurst is sat at approx. 30M above sea level, enVar is on top of a crest at 33M above sea level, with a proposed incinerator chimney level higher still at 59M above sea level. This will affect the outlook from the conservation area in breach of local plan policy.

2. The consultation undertaken by enVar to support their application was unrepresentative of the views of the surrounding villages, only 24 households canvassed out of a possible 6,607 and the information provided in their consultation is misleading, there is no clear description of the incinerator chimney that they are planning to build at a height of 26M within any of the consultation literature.
3. Insufficient ecological reports have been prepared on the effect of this development on wildlife and biodiversity in the surrounding areas.
4. There is no 'need'; there is evidence that Addenbrookes already has surplus capacity to deal with the current volume of clinical waste and that the applicant's statement of need is flawed based on the current levels of EWC 18 waste, some of which the applicant has said they will not be accepting.
5. No proper assessment has been made on the impact the additional HCV's movements will have on the local road networks  
No assessment of the safety impact their increased HCV movement would have on the Wheatsheaf junction, a junction that has seen multiple fatalities recently.  
No assessment has been made of the likely increase of LGV traffic through Woodhurst
6. There are no safe levels of dioxins, furans, particulate matter (PM10, PM2.5) or N20. All current government guidance suggests that further research is necessary to understand the long-term effects of these harmful chemicals on human health and yet the enVar application states there will be a slight increase in these chemicals into the surrounding area if the application is granted.
7. The background noise and lights from the plant running 24/7/365 will have an impact on people's health, background noise and light pollution has been shown to cause stress and sleep disturbance which in time will compromise the ability of future generations to meet their own needs.
8. The application claims that new development will bring economic growth to the local economy by creating 8 full time jobs. The local area benefits from high levels of employment and an additional 8 full time posts will not have

any impact on the rural economy. We believe that the building of an incinerator plant within the rural countryside within a group of working villages would actually reduce employment at existing rural businesses, as the threat to their livelihoods is considerable – be that via perception, visual impact or the effect of reduced air quality emissions from the incinerator.

9. There appears to be little consideration within the application for appropriate safety measures at the proposed site.

## Appendix 1 – Minutes of EnVar Liaison Meeting 10<sup>th</sup> May 2021



### MINUTES FOR LIAISON COMMITTEE MEETING

Date: 10<sup>th</sup> May 2021  
10:00 am

Host:	Envar Composting
Chair	Andy Sibley – Managing Director
Attendees:	Martin Graves – Envar (MG), Andy Sibley – Envar MD (AS), James Cooper (JC), Donna Haysom – Envar (DH), Helen Wass – Cambridgeshire County Council Planning (HW), Margaret Lumb – Bluntisham Transport Committee (ML), Tracey Hope – Bluntisham Parish Clerk (TH), Darren Smith – Environment Agency (DS), Cllr. Andy Notman – Chairman Woodhurst PC, Cllr Richard Sutton – Somersham PC Cllr Graham Bull – Huntingdon District Council
Apologies:	Cllr. Steve Criswell – Cambridgeshire CC, Charlie Trousdell – Envar, David Hopkins – Pidley Parish Council, Alistair Marr – Woodhurst PC,
Minute Taker	Donna Haysom Office Manager Envar Composting Ltd

AGENDA
Welcome & Introductions – Andy Sibley Site Update – Martin Graves Environmental Agency update Updates from Parishes Planning Updates AOB Close

### ***Introductions***

**Andy Sibley (AS)** - Welcomed everyone to the meeting and mentioned that it had been a long time since our last liaison meeting, which was 12<sup>th</sup> December 2019, Andy added that this was due to the COVID pandemic making meetings difficult. Asked if everyone was happy for the meeting to be recorded and everyone agreed. Andy asked if there were any comments from the last minutes and nobody had any, so it was agreed the minutes from the December 2019 meeting had been accepted.

### ***Site Update***

**MG** opened, explaining there had been no major operational changes at the site since the last meeting, however we have had a 365 kw solar array installed on roofs of some of our buildings meaning we do not have to draw so much power from the grid. We currently employ roughly 35 members of staff from the local areas including a new groundsman who will be keeping everything tidy, including the area around the site clear. We are also in the process of refurbishing the Heattop House which will be used as staff welfare and offices. We are still investing in plant improving efficiencies working at removing as much contaminants as possible, mainly plastic. We currently send zero to landfill. We are supporting local community projects such as St Ives in Bloom by supplying our soil enhancing product and Bluntisham Cricket Club by supplying shirts. We also continue to supply local farmers with our soil enhancing product.

**MG** - asked the meeting delegates if there were any questions, which there were not.

### ***Environment Agency update***

**DS** – opened by informing the meeting that he last visited the site in March where the site was performing well.

In February the site was issued a Permit Variation which includes improvements to containment and in particular the lagoons and other improvements (*N.B. this is due to nationwide changes in legislation and guidance*). The Environment Agency have no issues and he feels the site is operating very well, he added that the spec and quality of the outgoing material was very good. Darren went on to add that the Bio-Filters are working well. They do intend doing active odour monitoring.

Daren added that looking forward he will be supportive of the site looking at extending the sites storage capacity, especially for compost liquor and water. He ended his update by saying the Environment Agency are happy with how the site is operating at this time and asked for any questions. There were no questions.

### ***Update from Parishes***

**AS** asked for updates and comments from the Parishes

**Dick Sutton** – asked if the proposed traffic lights due to be installed at the crossroads will affect us at all?

**AS** – noted that most deliveries are via HGV's and we don't use the entrance at Gate 4 on Heath Road anymore. The entrance for our HGVs is well away from that junction and hopefully it will ease flow of traffic, but we can't see an issue for us.

There were no other comments.

### ***Planning update***

**Helen Wass** – Informed the meeting that since 2011 planning application for minerals and waste applications have been assessed against Cambridgeshire and Peterborough Minerals and Waste Core Strategy and Site-Specific Plan, in the last few years they have been working on a successor document which will be known as the Minerals and Waste Local Plan. After being reviewed by a Planning Inspector in September and taking on some of his suggested modifications, the plan was

found to be sound. It will be submitted to the Council in June. The aim is for the new plan to be adopted 20<sup>th</sup> July. Any new planning applications after this time will be judged wholly against this plan.

#### *Planning Updates*

AS/JC - Explained we have some planning updates on proposal on Envar is planning.  
Jim Cooper then shared the screen with Envar Regeneration Woodhurst presentation.

AS said that we are now looking at the future of organic material which will mean quite a few changes to the method of collection and how organic waste is processed. We will be looking to future proof the Envar business, to make sure we offer security for the business and the staff who work here. We are planning to recover energy out of the process and create a fertiliser product to enhance soil carbon sequestration.

AS - explained our process with food and green waste that is currently accepted at the facility. Andy went on to explain how the process could be further optimised through the use of a technology used in Germany and across Europe called Dry Anaerobic Digestion (dAD). This process will harness Biomethane potential from the material.

Andy went on to explain that we are looking to install a dAD plant on the site which will process about 60-70 thousand tonnes each which is about half our input at the moment.

He added that in order to supply the heat needed in the process we will need a Healthcare Energy Recovery Facility which will be small, 12,000 tonnes, and will treat healthcare waste. On the back of the AD plant, we are looking at a fertiliser plant, this will then produce a nutrient pellet fertiliser as a replacement for artificial fertilisers.

Some of the heat from the Healthcare Facility will be used for the fertiliser plant.  
Andy explained that due to the location of the AD plant we are also looking at a biomass storage building and a transfer station to replace buildings used for that purpose.

AS went on to describe the new legislation that the EA have bought in called Best Available Techniques.

With the new building we will also look to put solar on the roofs.

We want to change our fleet to run on biomethane, which we will produce from the AD plant and will only be used for our own trucks.

Gas that we do not use will go back to the national grid which will be used in homes in the local area.

AS - concluded, that is our proposal and asked James to go into things with more detail.

James Cooper gave a slide presentation which explained how Dry Anaerobic digestion works. The presentation also had slides on the Healthcare Energy Recovery, Gas fuelled fleet benefits. Nutrient Pellet Plant and how the design we have chosen maximises the use of inputs and outs from each facility; taking waste energy and product and putting those materials to good use which would not be achievable in isolation.

AS - summed up by explaining this plan will secure the future of the site and this will produce at least 10 more local jobs on the site.

It is intended to reduce the odour as it harnesses the methane and better treats the odour.

We have a good relationship with local trades/suppliers, and we see this as an opportunity to increase that.]

Overall tonnage into the site will not increase and traffic will remain under the permitted level, and we are hoping that there will be a reduction in the odour because of better treatment technology and a different process.

We are now in the final stages of our planning; this is now the part of the process called Public Consultation and this is our first consultation regarding this proposal. We have an agreed distribution list of properties around the site which we will be contacting within the next couple of days, we have set up the website which has a feedback system in it which will be live for the next few weeks and which the local population can make comments on our proposals, which we will review. We are hoping to submit final planning in June.

#### **Q&A**

##### **Richard Sutton**

Asked if we could possibly delay putting in the planning application until July as under current legislation a lot of Parish Councils cannot meet because they cannot do remote meetings.

AS - Responded by saying that this was a pre planning consultation the Parish Council will have their opportunity through the Planning Process to voice concerns, however we will try and work with you.

**Richard Sutton** - also asked what if our lorries needed to refuel, how will they do so on gas

AS - Responded that it's getting more common and this will realistically be about 3 years away, there are Gas fuelling stations in Sandy and in Kent and this will be a logistical point but we are confident that these fuelling stations are becoming more common around the country and we'll be looking at that.

**Helen Wass** - Added that Envar had spoken to her and understood that we needed to have sufficient time between closure of the pre application and time for consultation and publicity to take into account any points raised, she's tied up first week of June and on leave then and so realistically it won't be until last week of June and hopeful all meetings will be up and running by then.

**Tracey Hope** - Asked if the website could be shared around.

AS - Agreed it could be and added that it should be live later this afternoon.

**Andy Sibley** - closed the meeting by thanking everyone for their time and reminding the group that the website will be live hopefully this afternoon and if anybody had any questions to please feel free to contact us.

Hopefully later in year we can have a meeting face to face.

The address of the website is <http://www.regenerationwoodhurst.com/>