

**PLANNING APPLICATION CCC/22/151/FUL  
THE OLD BRICKWORKS, PUDDOCK HILL  
CONSTRUCTION AND OPERATION OF THERMAL TREATMENT FACILITY  
FOR GENERATION OF ELECTRICITY FROM NON-HAZARDOUS RESIDUAL  
WASTE**

**1. Introduction**

- 1.1 This application by agents acting on behalf of Thermeco was considered initially by the Parish Council's Planning Committee at a meeting held on 15th March 2023. The Committee submitted an objection to the planning authority, Cambridgeshire County Council, which is attached as an appendix to this report. The application has yet to be determined.
- 1.2 The County Council have invited comments on further documentation submitted by the agents in support of the application. These, totaling 45 documents in all, were added to the County Council's website on 20th September. They can be viewed on the County Council's website by accessing the planning register and searching under the application number. Consultees have until 30th October to respond and a special meeting of the Planning Committee to consider the additional documentation will be held on 28th October.

**2. The Site**

*Landfill*

- 2.1 The Committee will be familiar with the long and protracted history of development at the former brickworks site over the past 30 plus years. Approval was given for the filling of the clay pit on site with tipping commencing in 1996 with the permission requiring completion and restoration within 5 years. The works generated numerous complaints from residents over traffic, noise, odour and dust issues with several extensions of time for completion of the works. Tipping finally ceased approximately 7 or 8 years ago with further extensions of time for the completion of the restoration and landscaping which continues to the present day, almost 30 years since tipping commenced. The tipping of hazardous waste also continued for several years before a retrospective planning application for permission was refused by the planning authority and dismissed at an ensuing public enquiry.

*Materials Recycling Facility*

- 2.2 Planning permission was granted in 2012 for a materials recycling facility (MRF) adjoining the landfill site. Several of the conditions attached to the permission are significant in the context of the current application as follows –
- Unless otherwise agreed in writing with the Waste Planning Authority the quantity of waste that may be brought to the site shall not exceed 160,000 tonnes per calendar year.
  - Unless otherwise agreed in writing by the Waste Planning Authority no waste that originates outside a catchment area that comprises the administrative area of Cambridgeshire and Peterborough or a 45 kilometre radius of the site, whichever is the greater, shall be brought to the site.

- No waste other than inert and non-hazardous waste and bonded sheet asbestos shall be brought to, stored or processed at the site.
- 2.3 Information is not available as to the volume of waste processed at the MRF annually since it commenced operations but the Committee will be aware that this is predominantly associated with a skip hire business by the operator, Woodford Recycling. It is considered unlikely that at anywhere near its capacity under the planning permission is currently being transported to site.

### ***Combined Heat and Power and Waste Water Treatment Plants***

- 2.4 Planning permission was granted by the County Council in 2019 for combined heat and power and waste water treatment plants adjoining the MRF. The Parish Council objected to the application and was represented at two meetings of the County Council's Planning Committee when the application was determined. The permission lapsed as development had not commenced within 3 years of the date of the permission.

### **3. Recent Development at Woodhurst**

- 3.1 Members will be aware that an application was submitted in 2021 (CCC/21/088/FUL) for the construction of a dry anaerobic digestion facility, pellet fertiliser facility, healthcare waste energy recovery facility, waste transfer station and other proposals at Woodhurst. The application proposed the treatment of 200,000 tonnes of waste and 12,000 tonnes of healthcare waste per annum with not less than 40% by weight being sourced from the East of England. The decision is of some relevance to the current application in Warboys
- 3.2 Following substantial local concern, planning permission was refused by the County Council on the grounds that the proposed chimney as an industrial feature would cause harm to the landscape and visual amenity of the locality and that there was a perception of harm to the health and wellbeing of residents and local business activity. An appeal was submitted by the developer which was heard by a Planning Inspector. At the inquiry, the County Council decided not to contend the second reason for refusal of perceived harm to local residents and businesses. The appeal was upheld by the Planning Inspector but was called in by the Secretary of State as the development was considered to be of more than local significance.
- 3.3 The Secretary of State confirmed the decision of the Planning Inspector and granted permission in July 2024. In doing so, it was considered that while the proposed chimney would introduce an industrial looking built feature to the locality, it would not totally change the character of the local landscape and countryside surrounding it. In addition, the proposed development, subject to the design and mitigation that would be required by the Environmental Permit, would be unlikely to result in adverse impacts on air quality, or any associated impacts on human health or the environment.
- 3.4 The Secretary of State agreed that carbon saving benefits would arise from the reduction in global greenhouse gas emissions and that co-locating the different waste management processes would lead to benefits in terms of greenhouse gases. These included the heat, power and bio-gasses generated by processes on the site providing the energy to operate other onsite processes, fuel vehicles and contribute to grid capacity, the benefits resulting from the reduction in traffic flows overall through co-location. It was concluded that the carbon saving benefits carried substantial weight.

3.5 It remains to be seen how the views of the Planning Inspectorate and the Secretary of State will affect consideration of the application at nearby Warboys

#### **4. Application CCC/22/151/FUL**

4.1 Following the close of the public consultation period for the thermal treatment plant in Warboys, the County Council engaged independent consultants to assess the reports accompanying the application in relation to air quality and noise. They also obtained advice from Greater Cambridge Shared Planning on the landscape issues relating to the application in the absence of specialist landscape advice from Huntingdonshire District Council. Each of the resultant reports raised concerns in relation to the application. The County's Case Officer therefore wrote to the applicant's agents in May 2023 referring them to the independent consultants reports and requesting further information from the agents in response to the reports on the assessments for noise, air quality, health and landscape and visual impact. As a result, the agents have submitted a further 45 additional documents which were posted on the County Council's website on 20th September. Comments have now been invited by the County Council on the further documentation.

4.2 It is an unfortunate aspect of the planning process that the applicants are able to take 16 months to respond to the County Council's request for further information while consultees have only 21 days in which to comment on the plethora of documentation submitted.

4.3 It seems reasonable to assume that the County Council's Planning Officers had concerns over some of the supporting documents submitted in respect of the original application which prompted their decision to seek independent specialist advice. These are dealt with in turn below, together with other concerns relating to the application.

#### **5. Noise**

5.1 At the earlier meeting of the County Council's Planning Committee when the application for combined heat and power and waste water treatment plants were considered, the resident living in the closest residential property to the site spoke very eloquently and distressingly about the level of noise nuisance that she was experiencing from the existing operation of the MRF.

5.2 When the Thermeco application was submitted, the noise impact assessment by Spire Environmental only had regard to the noise impact of the application itself and omitted any reference to the operation of the adjoining MRF plant and the outstanding application for crushing operations on site (subsequently approved in September 2024). Reason (xiii) of the Parish Council's objection dealt with this point.

5.3 The independent report by WSP commissioned by the County Council draws attention to various inaccuracies in the Spire Environmental report in relation to its reference to the National Planning Policy Framework guidance. The Spire noise survey summarises a baseline noise survey that was undertaken between 14th and 21st December 2020 at three noise sensitive receptor locations in proximity to the entrance to the south of the application site. WSP have pointed out 'the only subjective noise sources noted as contributing to the sound levels measured at all three of the monitoring locations were road traffic and birdsong. However, it is considered inevitable that the ongoing operations at the existing MRF would also have contributed to the sound levels and it is not known why these have not been referred to in the NIA. The potential contribution of MRF operations to the baseline is important given that the existing noise limit

(imposed in condition 13 of the original MRF permission) is relative to a baseline sound level to be determined ‘in the absence of noise from the waste facilities’.

5.4 The WSP report goes on to question a number of aspects of the Spire report, concluding as follows –

‘Several key elements of the NIA are questioned including the adequacy of:

- The background noise survey.
- The derivation of background sound levels from the data set available.
- The extent of the operational noise sources considered in the noise predictions.
- The method of prediction used to determine the level of noise breakout and propagation from the proposed process buildings. 5 BS 5228:2009+A1:2014 Code of practice for noise and vibration control on construction and open sites. 6 Design Manual for Roads and Bridges, LA111 Noise and Vibration Revision 2, 2020.
- The assessment method.
- The assessment results and conclusions.

‘Furthermore, in the context of the NIA as an ES noise and vibration chapter, the following additional deficiencies have been identified:

- The absence of any clearly defined thresholds for determining impact magnitude or significance.
- The absence of an assessment of the construction phase impacts.
- The absence of an assessment of noise from development generated road traffic on the highway. On balance, it is considered probable that the magnitude of the noise impacts that have been considered in the NIA have currently been underestimated. It is suggested that a new ES noise and vibration chapter would need to be prepared and submitted to allow an informed determination of the application.’

5.5 The further report by Spire dated September 2024 shows that no additional monitoring has been undertaken in relation to the three closest noise sensitive receptors, although noise monitoring has been undertaken subsequently at the Fenside Caravan Site.

5.6 The report assesses the noise impact of the various processes on site at the MRF, proposed crushing plant and proposed thermal treatment facility. In approving application CCC/22/053/VAR for the crushing and screening of hardcore waste outside the MRF building, the County Council included a condition that the specific sound level (operational sound) emitted from the site shall not exceed 40dB at any residential dwelling when measured in accordance with the relevant British Standard. In analysing activities at the MRF, crushing operations and treatment plant, Spire suggest that none of the individual operations will give rise to noise exceeding 40dB at nearby properties.

5.7 It is suggested that the report by Spire has underestimated the cumulative impact of noise from the site if the application is approved and that there will be unacceptable intrusion at nearby residential properties.

## **6. Air Quality**

6.1 Air Quality Consultants Ltd, commissioned by the County Council, reviewed the Air Quality Assessment by Stopford submitted in support of the application. They concluded that ‘A number of major issues have been identified with the air quality material submitted, which means that insufficient information has been provided to

identify whether the proposed development would lead to likely significant effects.’ The additional report by Stopford dated May 2024 extends to 110 pages of modelling and assumptions but it is far from clear how (or if) this has addressed the concerns raised in the AQC report.

## **7. Health Impacts**

- 7.1 Reference was made earlier in this report that one of the County Council’s reasons for refusal of the Envar application at Woodhurst was a perception of harm to the health of local residents and businesses. As this was not contended by the County Council at the subsequent inquiry and was dismissed by the Planning Inspector, it suggests that this is not a sustainable ground for objection.
- 7.2 However, the application for Warboys contains little information as to the composition of the waste to be burnt at the proposed treatment plant. It is difficult to see how the Air Quality Assessment report accompanying the application can be specific about the nature of the gases emanating from the process and their perceived ‘negligible’ impact on people and the countryside when there is no evidence on the type of waste to be incinerated. The AQC report highlights the deposition of pollutants in the surrounding countryside in excess of those estimated by Stopford and it inevitably raises concerns about a potential impact on health.
- 7.3 Unless more specific evidence can be provided about the composition of the feedstock for the plant and an independent analysis of the resultant gases and the potential impact to health, concerns will remain.

## **8. Landscape and Visual Impact**

- 8.1 Greater Cambridge Shared Planning (GCSP) reported to the County Council in March 2023 and concluded that ‘there are serious concerns about the proposed development in landscape and visual terms. They objected to the application on the grounds that -
- The proposed development does not comply with Huntingdonshire District Council’s Local Plan Policy LP11 –Design Context 2.
  - The proposed development does not comply with Huntingdonshire District Council’s Local Plan Policy LP12 –Design Implementation.
- 8.2 GCSP considered that the significance of landscape visual effects was frequently understated in the original consultant’s report in support of the application by DSA Environment and Design. GCSP were of the opinion that ‘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.’ They also considered that ‘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 it is thought the proposals represent overdevelopment of the site.’ They drew attention to ‘concern regarding the height and mass of the boiler building and stack, and it is not clear what the extent of plume from the stack would be.’
- 8.3 In a subsequent report dated May 2024, DSA responded to the GCSP comments by focusing primarily ‘around any elements of the site that could be redesigned to allow for larger areas of soft landscape provision. The scheme has subsequently been redesigned as much as possible within feasible parameters to establish a slightly larger amount of planting on site. For Biodiversity Net Gain purposes, off site provision has

been proposed on the wider Warboys Landfill site.’ They conclude that ‘landscape impacts are predicted to be slight adverse, with the possibility to create a negligible beneficial effect in time, through landscape mitigation and management.’ The report accepts that ‘the taller elements of the proposal will not be able to be screened from most views so here colour and material choice is important, considering where these elements are most likely to be viewed from and against. For the main buildings themselves they are all most likely to be viewed against the backdrop of the landform or woodland, or where the very tops break the horizon they are viewed as part of the existing woodland.’ They therefore propose that the buildings are coloured green and the stack itself is coloured grey.

- 8.4 It is difficult to find any reference in the DSA report with regard to emissions from the stack and whether the nature of any plume that would be generated either in terms of its height or volume. This could further impact on the visual impact of the proposed development.
- 8.5 Furthermore, there is no indication in the documentation as to how the suggested 8.8 MW of power to be generated by the plant and exported to the National Grid would be transmitted off site. If this is to be by overhead as opposed to underground cabling, this would have a further visual impact.
- 8.6 Reason (xvi) of the Parish Council’s initial objection to the application dealt with the intrusive impact of the development on the proposed landscape. There appears nothing in the subsequent DSA report to address those concerns.

## **9. Traffic**

- 9.1 Reasons (ix) and (x) of the Parish Council’s initial objection dealt with the impact of additional traffic on Fenside Road and the potential queuing of HCVs in the early morning waiting to deliver to the site which was an unwanted feature of the landfill operations at the adjoining site.
- 9.2 A significant change has been made in the nature of the application since that time. Initially it was proposed that Woodford Recycling would provide 20% of the 87,500 tonnes of material to be used to feed the proposed thermal treatment plant from its adjoining MRF. The additional vehicle movements were assessed as being 30 per day (15 in and 15 out).
- 9.3 The proposal now is for Woodford to provide 100% of the feedstock for the treatment plant under proposed agreements with other waste collection companies. Woodford would segregate recyclable materials from the waste, the residue of which would be burnt in the plant. As the planning permission for the MRF permits the import of 160,000 tonnes of waste per annum, the agents acting for the applicants suggest that there will be no additional traffic movements emanating from the operation of the treatment plant.
- 9.4 In an addendum to the initial Transport Assessment, the consultants have stated that the material will be delivered to site ‘via the shared access road in rigid body electric vehicles capable of carrying an approximate payload of 14 tonnes. These vehicles are smaller than the HGVs proposed previously but will deliver a betterment in terms of noise levels and greenhouse gas emissions’.
- 9.5 Although the planning permission for the MRF allows for a maximum capacity of 160,000 tonnes per annum, no information is available as to the volume of waste

delivered to the site annually since it commenced operation. As the great majority of the vehicles travelling to the site are skip wagons operated by Woodford, it seems likely that the volume of waste currently processed is considerably less than its maximum capacity. Moreover, if it was initially assumed that the MRF could supply 20% of the feedstock for the treatment plant, it suggests that five times the volume of material would have to be processed by the MRF to supply 100% of the feedstock. Assuming that the additional feedstock is delivered in 14 tonnes capacity vehicles, the additional 80% of the proposed 87,500 tonnes to be processed would amount to 10,000 vehicle movements per annum or 40 per day (20 in and 20 out). While this may be within the capacity of the MRF's permission, it represents additional vehicle movements compared to the current situation.

- 9.6 There is no reference in the documentation as to the amount of recyclable waste that typically would be separated by the MRF. The Carbon Report submitted by the agents refers to the content of a typical black bag of household municipal waste as being paper, food, plastic, clothes, glass and metal. Presumably, a substantial proportion of this can be separated by the MRF for recycling which suggests that considerably in excess of 87,500 tonnes of waste will need to be transported to site to generate the residual volume to feed the treatment plant. This will generate considerably more vehicle movements than anticipated in the preceding paragraph.
- 9.7 The application also assumes that the MRF has the capacity to process this volume of waste but there is no mention of this in the information submitted. It is not inconceivable that this would necessitate a subsequent application to increase the facilities on site or extend the hours of operation of the MRF to accommodate the additional material. Without evidence as to the capacity of the MRF to process the additional material, an objection should be submitted.
- 9.8 Moreover, the agreements proposed between Woodford and other waste companies are in draft only and could be subject to change at any time. It is accepted in the various documentation submitted that this is a volatile market and operators will deliver waste to the most economically attractive end destination for treatment. There is no certainty therefore that Woodford will, in the future, be able to supply 100% of the feedstock for the proposed treatment plant. If this is the case, additional traffic movements in addition to those contained in the MRF permission will be required.
- 9.9 The Parish Council's objections in terms of the traffic implications of the proposal therefore still apply.

## **10. Need**

- 10.1 The County Council's Minerals and Waste Plan (Policy 3) sets out the present capacity gap between forecast arisings and existing and planned capacity to calculate a capacity gap showing either a deficit or surplus in provision. In terms of the treatment and energy recovery processes for mixed municipal waste, the capacity gap shows a surplus of capacity in existing provision until 2031 and further planned provision which creates a surplus throughout the remainder of the Plan period to 2036.
- 10.2 The additional documentation supplied by the applicants' agents suggests that this assessment relies on an existing permission for a treatment plant at Peterborough with a capacity of 165,000 tonnes per annum. However, as the permission was granted some 15 years ago and the plant has yet to be built, the agents suggest that this is unlikely to be developed and should be discounted. It is contended by the agents that there is therefore insufficient capacity within the County to treat the waste being generated

without this being dealt with by landfill or export overseas for treatment and that the application for the plant at Warboys will play an important role in moving the volume of waste to be processed (87,500 tonnes p.a.) up the waste hierarchy.

- 10.3 Nevertheless, the Peterborough permission remains extant and the assessment of capacity in the Minerals and Waste Plan does not take into account the subsequent approval of a plant at Wisbech with a capacity to process 625,000 tonnes p.a., nor the approval of the Envar proposal at Woodhurst.
- 10.4 It is suggested therefore that there is sufficient capacity to meet demand and that the proposal at Warboys is unnecessary.

## **11. Location**

- 11.1 The Minerals and Waste Plan states that 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.
- 11.2 One of the additional reports now submitted in the case of Warboys deals with an assessment of the availability of sites near larger settlements in Cambridgeshire which concludes that there are no sites on the market that would be suitable. Much is made in the arguments in support of the application of the benefits of co-location with the adjoining MRF. However, the report assessing alternative site availability is cursory in nature and does not appear a thorough investigation of potential locations. The great majority of the waste arisings in Cambridgeshire is generated by the cities of Peterborough and Cambridge and, to a lesser extent, the various market towns throughout the County and it is clear that the Minerals and Waste Plan intends for the waste to be treated as close as possible to source as opposed to a rural location in the countryside such as proposed at Warboys.

## **12. Power Generation**

- 12.1 The supporting documentation predicts that the proposed treatment plant at Warboys will generate 31 MW of electricity, of which 8.8 MW will be exported to the National Grid which is sufficient to power 21,000 homes with the remainder used to power the plant itself over its planned timescale of 20 years. It is claimed that this is a much needed contribution to energy security in this country.
- 12.2 The figures appear dubious. If 8.8 MW of power is sufficient to power 21,000 homes as claimed, it assumes that roughly three times this amount (22.2 MW) is needed to operate the treatment plant itself. That, using the comparisons contained in the application, would be sufficient to power approximately 60,000 homes which seems excessive. There does not appear to be any evidence or analysis to support these predictions which raises questions as to their validity.
- 12.3 While the Government's policy to move towards net zero in terms of power generation and to close power stations using fossil fuels may give rise to concerns of energy security nationally, it is difficult to envisage how the burning of waste is a suitable process to ensure energy security or that this is a cleaner, more environmentally friendly and secure method of energy generation than natural gas.
- 12.4 As mentioned elsewhere in this report, there also appears to be no mention as to how the surplus energy will be conveyed to the National Grid which raises questions as to whether additional pylons will be required.

## **13. Carbon**

- 13.1 A consultant's report submitted as part of the additional documentary evidence in support of the application deals with a carbon assessment of the proposal. By means



of a complicated series of assumptions about the power generation from the burning of waste to power the plant as opposed to fossil fuels and the gases generated from the process as opposed to the generation of landfill gas from landfill disposal, the consultants contend that there is a net deficit of 4,057 tonnes carbon dioxide equivalent emissions over the 20 year operational lifetime of the plant, including construction emissions. However, if the plant has a lifespan of 20 years, the carbon impact of decommissioning the site has not been taken into account which would affect the calculation of its carbon impact.

- 13.2 The report also presumes that the energy used to power the treatment plant if not waste would be from fossil fuel (which is to be phased out nationally) as opposed to clean energy such as solar or wind. If the latter were used in the calculation, the carbon dioxide equivalent would likely be detrimental as opposed to beneficial. Moreover, recent studies indicate that energy-from-waste plants are now producing the same amount of greenhouse gases per unit of electricity as if they were burning coal. These include the UK Climate Change Committee which has recommended that no more plants be built without efforts to capture all their carbon emissions.
- 13.3 There is an assumption that the proposed plant will treat municipal waste but the only reference to its content is in the consultants' Carbon Report which states that 'a typical black bag of residual municipal solid waste (MSW) will contain a mixture of different things, such as paper, food, plastic, clothes, glass and metal.' The treatment plant will separate out materials which are recyclable but much of the municipal waste referred to can be recycled in domestic waste at household level before collection. It could be argued that greater emphasis should be placed on household recycling which would reduce the amount of 'general' household waste which requires thermal treatment or landfill.

#### **14. Conclusion**

- 14.1 The multitude of reports accompanying the application paint a picture of a proposal that will have negligible impact on the community and adjoining countryside and no additional traffic movements to and from the site.
- 14.2 It is suggested that the reverse is the case. The application is reliant on many suppositions and omissions, i.e. that Woodford can supply 100% of the necessary feedstock capacity whereas this is dependent on suitable contracts with other waste companies and the unknown capacity of the MRF to process this amount of waste; there is no mention of how much waste must be processed at the MRF to leave a residue of 87,500 tonnes for incineration; there is no evidence of the supposed generating capacity of the plant, the amount of surplus capacity to be generated and how this will be transmitted to the National Grid; there is no mention of the potential visual effect of emissions from the stack and so on.
- 14.3 The application assumes an operational lifespan of the development of 20 years but there is no explanation as to why this timescale has been chosen. The community of Warboys has 30 years of bitter experience from misleading statements and promises from operations at this site, for example a 5 year permission to complete the landfill operations which extended to 25 years, the tipping of hazardous waste without planning permission, the co-location of an MRF to separate waste from landfill which is being used to justify the proposed co-location of a thermal treatment plant now that the landfill site has closed. The community should be wary of potential further applications to extend the life of the treatment plant beyond 20 years, an increase in capacity of the plant from 87,500 tonnes per annum, an expansion of the MRF to provide the required

volume of feedstock for the treatment plant, an extension of the hours of operation of the MRF to be able to process the volume of waste required to feed the treatment plant; the value of the 'draft' agreements with other waste providers to supply waste for treatment. Applications for variations of any ensuing planning permission conditions are extremely difficult for the planning authority to refuse, once the proverbial foot is in the door .

14.4 For the reasons contained in this report, it is recommended that the Committee affirm their previous decision to object to the application and recommend the County Council to refuse the application on the following grounds –

- (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 to 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 both from the 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 of unacceptable levels of noise emanating from the site so it is inconceivable that the further intensification of use would not result in 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 of the MRF, an increase in capacity of the proposed treatment plant or an extension in the suggested lifespan of the operation.

