

Great Witchingham Parish Council

Response to NCC C/5/2015/5007 Change of use from B8: Warehousing to a Sui Generis use for waste processing and the production of Refuse Derived Fuel (RDF); installation of office, 2 x weighbridges and fuel store

Great Witchingham Parish Council (GWPC) wish to object to this application on the following grounds:

Transport

The planning statement says that waste will come from North Norfolk and after processing will be transported to Kings Lynn. This would require vehicular movements on the A1067, in particular HGV movements to increase dramatically through the village of Lenwade. An increase of 220+ cars a day is not the same as an increase of 220+ HGV's a day. An additional difficulty is that the pedestrian pavements are, at points, extremely narrow meaning pedestrians have to walk in single file right next to a busy roadway. Unfortunately, due to historical building and business design, the widening of the pavements would not be possible without narrowing the road. GWPC has speed sign along the route which monitor data. Although the speed limit is 30 mph, the information gathered shows the average speed to be between 35mph and 45mph, with top speed of up to 90mph. Additional HGV's on this route are clearly hazardous to pedestrian safety.

The planning statement also says that waste will come from Norwich and after processing will be transported to Felixtowe. If this HGV traffic uses the newly created B1535 HGV route (linking the A47 and A1067), it would more than double the number of HGVs on this route.

When the Atlas Works was used for 'heavy' industrial concrete production in the past, there was a local railway branch line which was used to bring in raw materials and to take out the finished product so there was less dependence on HGV movements which is not the case now.

The B1535 is the designated route for HGVs, however it cannot be seen as a suitable road. It has a number of bends with poor visibility, where HGVs are often in the centre of the road, together with several right angled turns. It is a road where any traffic travelling at the national speed limit is a danger. There is no footpath on this route which is also used by pedestrians to access The Dinosaur Park.

Connecting Norfolk Norfolk's Transport Plan for 2015-2026 states that its aims are:

- Reduced emissions
- Pedestrian safety
- Promoting active and healthier travel options for short journeys to schools, services and places of employment
- Creating a safer environment for travel
- Providing opportunities for sustainable tourism, recognising the benefit of community and heritage rail lines (Marriotts Way)

Point 3.16 states

Norfolk has a high quality natural and built environment which significantly enhances quality of life for Norfolk's residents and visitors. It is important that we protect this from any negative impacts that may arise from transport, for example emissions or noise pollution. Ensuring that the highway environment complements the surrounding landscape and is not detrimental, particularly in heritage areas, landscape or nature conservation designations, is important.

Further points from **Connecting Norfolk** Norfolk's Transport Plan for 2015-2026 are:

4.6 Ensure growth does not compromise highway safety.

6.1 Reducing emissions from transport is one of the government's key priorities. Transport is a significant source of UK greenhouse gas emissions and makes up around a third of overall carbon emissions in Norfolk. By 2020 the UK is committed to reducing carbon emissions from transport by 14% nationally. Norfolk will need to make a contribution to this.

6.2 Transport also impacts upon air quality, which can have a negative impact upon human health. There are a number of Air Quality Management Areas in Norfolk where air quality falls below acceptable levels due to emissions from road traffic.

6.5 The number of Air Quality Management Areas in Norfolk has risen over the last five years. These are mainly located **where roads are heavily trafficked or see a high level of vehicles that are big polluters, including buses or heavy goods vehicles**. Poor air quality can impact upon a place's liveability and can have a detrimental effect on human health. **It will be important to build on achievements already made in some of our management areas, whilst recognising the trigger points and acting to prevent other areas from being declared.**

The planning application is at odds with NCC's Transport Plan 2015-2026.

In addition the amount of waste referred to in the planning application, 200,000 amounts to nearly half of NCC collected municipal waste.

Norfolk Minerals and Waste Development Framework Tenth Annual Monitoring Report for Waste Data 2013-14, published in May 2015 states:

2013/14 Local authority collected municipal waste in Norfolk over the reporting year totalled 396,740 tonnes, a slight increase compared with the previous year but remains just below the 400,000 tonne mark where it has been for the last 5 years.

Management type	Quantity managed	
	Tonnes	Percentage
Recycled	96,176	24.3
Composted	71,406	18.1

Reuse	1,094	0.3
Refuse Derived Fuel	14,565	3.6
Incinerated with energy recovery	30,965	7.8
Landfilled	181,253	45.8
Incinerated without energy recovery	27	<0.1

If this application is approved, nearly half of all Norfolk’s municipal waste would be dealt with on an inadequate road system.

Odour

The planning statement refers to 160,000 tonnes of black bin liner waste being processed at this site. Of particular concern is the odour which will result from the processing of household waste. Odour will be produced from the point at which the lorries are tipped so providing filtered extraction to the waste handling lines will not be adequate to control odour at the reception point. There will be a constant outside source of odour from black bin liner waste whilst it is waiting processing.

Noise

GWPC is concerned that the current state of the existing buildings would mean excessive noise for neighbouring properties and businesses and users of Marriotts Way. There are no adequate sound insulation properties at the existing buildings. Further, the planning statement says that the plant will be in use for 24 hours a day, seven days a week. The suggestion that it is “***recommended that if the shredders are to be used between the hours of 22:00 to 06:30, suitable mitigation measures are implemented***” still means that during every evening and every early morning, seven days a week, there will be excessive noise. There will also be noise from reversing lights on vehicles throughout the night. Further, there is no proposal for any suitable mitigations measures.

Vermin

Household waste on this scale will undoubtedly lead to rodent vermin infestation. GWPC understands that this is the situation at the RDF plant at Costessy (which is far smaller than this proposal). Rodent infestation will impact on local businesses and residents and impact on users of Marriotts Way. GWPC is particularly concerned about vermin infestation in relation to the close proximity of Bernard Matthews. Vermin infestation could have a devastating effect in terms of the spread of disease and could have a catastrophic effect on this food business, a major local and regional employer. Other nearby food businesses located in Shepherds Business Park would also be affected.

Dust

The planning application documentation clearly states that dust will be an issue due to operation vehicle movements, exhaust emissions and externally stored waste. It

recognises that there are “sensitive receptors” in the local area who will be affected by this. It also states there is a risk of contamination.

Water pollution

As well as the risk of pollution to the River Wensum, many local residents and businesses, including Bernard Matthews, extract water from direct from the water table. The drains from this site are in very close proximity to the water table and therefore a huge risk of pollution exists.

Bad Neighbour

GWPC understands that the planning authority must look to the concept of “bad neighbour” when considering planning applications. The protection of private interests is a material consideration for planning purposes. Light pollution from night time operations, as well as odour, noise, vermin, contamination and safety issues mean this proposed development constitutes a bad neighbour to sensitive receptors, other local residents and businesses. This is of great significance as there are no adequate mitigation measures contained in the planning application.

In addition, Shepherds Business Park is 15 metres from the site, not 200 metres as detailed in the planning application.

Environment

Paragraph 109 of NPPF states:

The planning system should contribute to and enhance the natural and local environment by preventing both new and existing development from contributing to or being put at an unacceptable level of risk from, or being adversely affected by unacceptable levels of soil, air, water or noise pollution.

200,000 tonnes of waste, 160,000 tonnes of which is black bin liner waste, will create both an unacceptable risk to, and have an adverse effect on the natural and local environment.

GWPC supports and reiterates comments made by Bernard Matthews in its objections to this planning application, including:

Core Strategy Policy CS8 - Residual Waste Treatment Facilities sets out the number of residual waste treatment facilities will be required to serve the needs of the county with sufficient capacity to cater for projected residual municipal commercial and industrial waste. Policy CS8 specifically states:

"RWTS will be acceptable where the proposed facility is:

- a) in use as a waste management site; or*
- b) in existing general industrial use (B2), in storage and distribution use (B8) or identified for these uses in a local plan or development plan document; or*
- c) on a brown field site; or*
- d) located in redundant agricultural buildings;*

so long as it would not cause unacceptable environmental, amenity and/or highway impacts. (Our emphasis.)

Core Strategy Policy CS14 - Environmental Protection sets out that:

"The protection enhancement of Norfolk's natural and built environments is a vital consideration for future minerals extraction in an associated development and waste management facilities in the county. In particular, developers must ensure there are no unacceptable adverse impacts on and ideally improvements to:

- natural resources, including water, air and soil;*
- the character and quality of the landscape and townscape, including nationally designated landscapes (the Norfolk coast area of outstanding natural beauty and the Norfolk and Suffolk Broads);*
- biodiversity and geodiversity, including nationally and internationally designated sights and species, habitats and sights identified in biodiversity and geodiversity action plans;*
- heritage assets and their setting and cultural assets; and*
- residential amenity e.g. noise, vibration, dust, lighting and visual intrusion.*

Where any development proposals would potentially have adverse impacts on any of the assets listed above, the adequacy of any proposed mitigation measures would be assessed on a case by case basis.

The highest standards of design operation and (where relevant) restoration and aftercare of sights must be practiced."

Policy WAS 78 of the Norfolk Minerals and Waste Development Framework Waste Site Specific Allocations DPD adopted October 2013 which provides for the allocation of the site states that

"Development will be subject to compliance with adopted Core Strategy and Development management policies, and will require any planning application to address in particular, the requirements below:

- Protection of amenities of residents, other businesses, and users of Marriots Way through the siting and design of buildings, plant and equipment and mitigation and control of visual intrusion, noise, vibration, dust, bioaerosols, litter odour and lighting."*

We submit that the Proposed Development is not fully compliant with the development plan in that it has not been shown that the Proposed Development will not cause "unacceptable environmental impacts on other previously developed land" as per Core Strategy CS6, or "unacceptable environmental, amenity and/or highway impacts" as required by Core Strategy CS8.

Great Witchingham is mentioned numerous times in the planning application, yet GWPC is not on the list of consultees, and was not notified about proposals for either of the Screening Reports. GWPC understands that an Environmental Impact Assessment (EIA) is essential for any development on this site, particularly in relation to the impact on the local SSSI's, the River Wensum, Marriots Way and the Ancient Barrows. GWPC understands that in this case an EIA is required by law and that no EIA has taken place.

The Norfolk Minerals and Waste Development Framework, Waste Site Specific Allocations, Development Plan Document:

WAS 78 Land at SPC Atlas Works, Lenwade

6.78.1 Site Characteristics

- The site has an estimated capacity of 150,000 tonnes per annum for mixed waste processing, metal recycling, inert waste recycling, windrow composting, in-vessel composting, physical, chemical, and/or mechanical/biological treatment of household waste, waste transfer, and other forms of residual waste treatment excluding thermal treatment.
- The nearest residential property is approximately 30 metres from the site boundary
- The site is approximately 1KM from Alderford Common SSSI
- The site is within 150 metres of the River Wensum SAC and SSSI

6.78.2 The site is extensive, within an employment area with other existing commercial and industrial uses, including an existing metal recycling site. **Due to the location of the site**, in proximity to Marriott's Way footpath, County Wildlife Sites and residential dwellings, **mitigation measures will be required for potential amenity, landscape, highways and ecology impacts.**

The proposed planning application exceeds the stated capacity by more than a quarter, it contains no adequate mitigation measures and is in close proximity to SAC's and SSSI's. Saddlebow was due to take 275,000 of waste per year, compared to a proposed 200,000 for this application. We are not the replacement for Saddlebow.

Toby Coke, chairman of Norfolk County Council's Environment, Development and Transport Committee, has recently said:

"In a nutshell, that means no incinerator will be built in our county to deal with our residents' waste and we will be looking for waste services that squeeze more valuable resources out of our rubbish. And where ever possible **we will be looking to use smaller local area waste treatment facilities so that we deal with waste as close to the places where it was generated as possible.**"

NCC has recently put out a tender for residual waste disposal of 160,000t pa. The application deadline was 9th August 2015. It is of vital importance that there is openness and transparency in this process and that information is provided as to which company won the contract and if it has a bearing on this application.

The tender states:

Norfolk County Council wishes to enter into a contract or contracts for the provision of Waste Treatment and or Disposal services for approximately 160 000 tonnes of residual waste per annum.

Norfolk County Council has a waste strategy for procuring its residual waste services and waste policies that clearly define what its priorities and requirements are in delivering these services.

As a part of the strategy, and in line with the policies, Norfolk County Council is seeking services to treat and/or dispose of local authority collected residual waste, for which the statutory responsibility falls or is delegated to Norfolk County Council.

Is it pure coincidence that this application is for 160,000 tonnes of residual waste?

The estimated value of this contract is between 40 and 100 million pounds.

In conclusion, GWPC object to this planning application in the strongest possible terms and request that NCC refuse this application.