

GREAT WITCHINGHAM PARISH COUNCIL

Minutes of meeting of Great Witchingham Parish Council held at Great Witchingham Village Hall on Monday 16 May 2016 at 6.45pm.

Present:-

Jane Wisbey (In the Chair)

Herbie Burton

Pauline Brown

Susie Rowles

Alex Manson

David

David

Sonya Blythe (clerk)

Members of the public.

1635	<p>Welcome by the Chairman.</p> <p>The chairman welcomed those present.</p>
1636	<p>To receive apologies for absence.</p> <p>None received.</p>
1637	<p>To receive members' declarations of interests for meeting tonight.</p> <p>None.</p>
1638	<p>To agree the response to the amended planning application – C/5.2015/5007 – Morton on the Hill – S P C Atlas Works.</p> <p>JW read out the draft objection to the amended planning application. Amendments were agreed, with the final version being attached as appendix A. This would be submitted to Norfolk County Council (NCC).</p> <p>It was noted that an earlier draft had been submitted to NCC by a member of the public, without permission. The clerk would ask that this be removed and replaced.</p> <p>JW was thanked for her hard work in writing the objection.</p> <p>It was agreed that DSs son would address the Planning Regulatory Committee when the application was considered and that County and District councillors for the parish and Keith Simpson MP be copied into the response.</p>

Meeting closed at 19:20

Signed:

Chairman

GREAT WITCHINGHAM PARISH COUNCIL

c/o Sonya Blythe
36 Acres Way
Drayton
Norwich
NR8 6UT

18 May 2016

Objections to amended planning application at Atlas Works, Norwich Road NR9 5SL

These objections are in addition to Great Witchingham Parish Council's (GWPC) objections to the original application. GWPC understands that of the 400,000 Tonnes of household waste collected in Norfolk every year, Norfolk County Council has no long term plans for the disposal of 160,000 Tonnes of that waste. This was the reason for building Saddlebow. However, Atlas Works is not the answer to the failed Saddlebow scheme.

1. The revised application say there will be no change to the walls, windows or doors of the existing building and that any damage to the walls would result in like for like replacement. The existing walls are made of grey sheet cladding (of unknown composition, possibly asbestos); they are not fit for purpose and are not sound proof. Appendix B states: "The existing buildings are in good condition and will be retained." The existing buildings are in a very poor state of repair and are not fit for purpose.
2. The revised application states there will be no trade effluent. However 150,000 Tonnes of Municipal waste together with 300,000 Tonnes of Commercial, Industrial and other waste and 5000 Tonnes of Hazardous waste will by its very nature produce effluents.
3. Appendix B states: "potential impacts from noise, odour and dust will be limited to the adjacent land which is in industrial use and will therefore not be significant. This statement is inaccurate. The rear of the site is adjacent to Shepherds Business Park (less than 15 metres away, not 200m as stated in the planning application) to the west which contains businesses requiring an odour and dust free environment. In addition, the Amended Planning Statement does not specify what will be stored in the rear storage area of the site, only that materials stored at the **front** of the site are "unlikely to produce odours". What is to be stored at the rear of the building as marked in blue on the plan? Appendix B refers to a lack of residential receptors. Again, this statement is inaccurate. Please refer to the plans.
4. Appendix D (Proposed Site Access) refers to a "surface water drainage system". With waste stored externally, every time it rains it will lead to pollution with all the run off from the waste seeping into the ground. In addition, there is no adequate drainage system within the building or entire site and GWPC understands that the existing drainage system is in very close proximity to the water table. The reports call for further investigation into the drainage system. Specifically, Appendix K refers to the need for further survey reports with regard to the existing drainage system which leads to a soakaway north of Marriotts Way. No provision has been made for this.
5. Appendix D (Flood Risk Assessment) states: "The site is formally drained at the moment using manmade (concrete) channels which direct surface water runoff to a natural

detention basin. This basin offers attenuation and natural infiltration. The overflowing water discharges to a second (adjacent) detention basin. The outflow is directed to the nearby River Wensum. There is therefore a high risk of the River Wensum, a SSSI becoming polluted with drainage, run-off and effluents from the waste. Please note that the planning application is for a total amount of 455,000 Tonnes of waste (Municipal: 150,000 Tonnes, Construction, Demolition and Excavation: 150,000 Tonnes, Commercial and Industrial: 150,000 Tonnes Hazardous: 5000 Tonnes). This is far greater than the 150,000 referred to in much of the documentation submitted with the planning application. This is misleading.

6. Appendix D (Flood Risk Assessment) requires “certain measures will be taken in terms of improving the water quality aspect of the existing drainage layout”. This issue is not adequately addressed in either the application or amended application.
7. Appendix D (Flood Risk Assessment) figures 12 and 13 show clearly that the drainage system is inadequate and highly likely to cause pollution to at least one SSSI site.
8. The Local Plan for Norfolk County Council Policy ENV24 (Protection of water resources) states that: “In the consideration of considering development proposals regard will be taken to the availability of water resources and the effect of increased abstraction on environmental water needs (i.e. those of rivers, wetlands and estuaries, including the needs of navigation, fisheries, recreation and nature conservation) as advised by the environment agency. **Development which jeopardises water resources or has a significant adverse impact on the water environment will not be permitted.**”
Bernard Matthews, the SAC and SSSI’s are all jeopardised by this development.
9. Appendix D (Flood Risk Assessment) recommends that “Surface water should ideally be managed by SuDS techniques in order to promote sustainability, amenity, and bio-diversity. Use of SuDS to manage surface water should be examined and incorporated into the design. Consideration should be given to the use of permeable access roads and footpaths so that they allow surface water to flow into the ground and mimic the natural surface water flow path provided that the infiltration test demonstrates efficient soil permeability. The detention basins, downstream of the site, should be retrofitted and potentially re-planted in order to maximise treatment efficiency. Certain types of reeds such *Typha latifolia* and *Phragmites australis* improve the treatment performance of such features by promoting absorption of road-related pollutants. These issues have not been adequately addressed.
10. Appendix K (Contaminated Land report) states that there is a British Geological Survey groundwater flooding susceptibility flood area within 50m of the site. The River Wensum, a SAC and SSSI and Alderford Common, an SSSI, are environmentally sensitive areas, located near to the site that would be at risk if this development went ahead. The Atlas Works site itself lies within Environmentally Sensitive Area, Broads as designated by Natural England. Contamination and pollution are of major concern if this application is granted it would give approval for 150,000 Tonnes of black bin liner Municipal waste. Appendix K refers to the need for further survey reports with regard to the existing drainage system which leads to a soakaway north of Marriotts Way. No provision has been made for this.

11. Appendix F (Transport Statement) estimates an additional 165 waste carrying vehicles entering and leaving the site on a daily basis, plus the vehicles of 50 staff. This estimate is based, erroneously, on the site being used for 150,000 tonnes of waste. Yet the application asks for planning permission for 455,000 Tonnes of waste (Municipal: 150,000 Tonnes, Construction, Demolition and Excavation: 150,000 Tonnes, Commercial and Industrial: 150,000 Tonnes Hazardous: 5000 Tonnes). This would equate to an increase of 495 waste carrying vehicles a day going to and from the site. The road system linking the A1067 to the A47 and the A1067 route through Lenwade are wholly inadequate to deal with this amount of increase in waste carrying vehicles. Should the Atlas Works site be opened for waste processing, it is essential that planning conditions ban all waste carrying vehicles from travelling through the village of Lenwade on the A1067. Any potential access to and from Atlas Works for waste carrying vehicles must be limited to the new NDR or the HGV route to the A47.
12. Appendix H (Dust Assessment) refers to the nearest residential dwellings as being 1KM to the West and 300m to the East. This is inaccurate as there are residential dwellings much closer to the site. The dust assessment is based on erroneous data and cannot be relied upon.
13. Appendix G states that “noise from the proposed RDF facility will have little impact on the closest noise-sensitive receptor”. However, in contrast, it goes on to state, “it is recommended that this particular piece of equipment (shredders) be operational between the hours of 22:00 and 06:30 only if noise mitigation measures are implemented”. No provision is made for this in the planning application and even if provision were to be made, this still leaves unacceptable levels of noise from 6:30 am until 22:00 pm.
14. In Appendix G, the report ‘Summary of specific plant noise (dB Leq)’ gives a Resultant Reverberant level of LAeq of 88 (more likely 82dB LAeq). The ‘Summary of existing ambient noise levels at receptor’ gives levels (dB LAeq) of 46.1 daytime (43.4 quietest typical) and 45.5 night (38.338.3 quietest typical). The report states **“According to BS 4142 assessment criteria, a rating level around +10dB or more above background is likely to indicate significant adverse impact”**. Yet the report concludes there will be no significant adverse impact. Therefore the conclusions of the report are erroneous and cannot be relied upon. The reports clearly show that if this development went ahead, noise levels WILL have a significant adverse impact on receptors and users of Marriotts Way.
15. Appendix L (Heritage Statement) notes that the site lies within a complex prehistoric mortuary landscape on the terraces of the River Wensum, characterised by Bronze Age round barrows and barrow cemeteries. One barrow with a possible Neolithic precursor lies adjacent to the site to the north. Crop marks of Iron Age enclosures and boundaries can be seen to the south of the site and medieval embankments, channels and ponds lie to the south-west. Extensive metal detecting of the areas of higher ground above the river terraces has produced a substantial quantity of objects dating to the Iron Age, Roman, Saxon, medieval and post medieval periods. The site lies adjacent to a tumulus, Scheduled Monument no 129 (HER 7718; Fig 7) to the north. The site is also adjacent to the former site of a 19th-century milestone (HER 56414). In terms of planning policy, the strategic development plan policy framework Policy ENV6 states that to conserve the wider historic environment, local authorities and other agencies should afford the highest

level of protection to historic and archaeological areas, sites and monuments of international, national and regional importance. The Broadland District Local Plan (Replacement) POLICY ENV17 refers to ancient monuments and archaeological sites. It states that development which would adversely affect a Scheduled Monument or other nationally important archaeological sites and monuments, or their settings, **will not be permitted**. Government guidance in Planning Policy Guidance Note: Archaeology and Planning (PPG16) states that there should be a presumption in favour of the physical preservation of nationally important archaeological remains whether scheduled or not, and their settings.

16. Appendix L (Heritage Statement) notes that cartographic evidence suggests that the site has not been settled since at least the 18th century until the construction of the Atlas Works estate in 1944. The relevant planning policies were not in place in 1944 and therefore all references to Atlas Work in its “Heyday” should be dismissed.
17. Appendix L (Heritage Statement) describes the setting as “largely tranquil apart from occasional short bursts of industrial noise emitting from the trade premises either side of the development site”. Although the existing “tranquillity of the viewpoint is compromised by the proximity of the industrial works, the noise is only intermittent”. It states that “the wider setting of the asset is largely open countryside with small dispersed villages and small, dense patches of woodland which makes a neutral contribution to the asset.” Also, “heavy goods vehicles accessing the site could negatively influence the ambience of the asset with movement and noise as they draw the viewers’ attention away from the stillness of the asset’s natural setting”. Appendix L states that “the current derelict site is tranquil and “the overall effect of the development including the movement of HGVs and industrial noises will seem more intrusive in the landscape than the current situation”. It states that “Noise, light and odour pollution may be introduced to the asset “and that the “development will widen the conceptual gap between the busy modern environment on one side of the Marriot’s Way footpath and the wild and unstructured environment of the heritage asset”. Importantly, Appendix L also states that “The future prospects of the heritage asset are considered to be at risk of harm from any further potential development proposals. There are additional underused or disused areas of the Atlas Works estate, including the area of land immediately to the south-east of the barrow. There is a risk that future prospective developers could consider these areas as a potential development commodity, therefore initiating a succession of development proposals, each one contributing to a negative cumulative impact.” In light of the continual references in the application and associated documentation to 150,000 Tonnes of Municipal waste, when, in fact the planning application is for total of 455,000 Tonnes of waste, this is of great concern.
18. The Amended Planning Statement says that “groundwater is considered to be at low risk from the operations. This is at odds with the information in the applicant’s own supporting documentation. In addition to environmental concerns, Bernard Matthews is reliant on this groundwater for its business.
19. Please note that a number of the submissions supporting this application are from existing Atlas Works tenants.

20. GWPC recognises that Norfolk has to find a solution to its waste management problem. NCC have 160,000 Tonnes of Municipal waste per year that needs to go somewhere other than landfill. We, however, are not the answer to Saddlebow.

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

21. The site only has capacity for 150,000 Tonnes waste. It is already in use for metal recycling of an unknown amount of Tonnes per year. **This site does not have the capacity to take the amount of waste proposed on the planning application** (Municipal: 150,000 Tonnes, Construction, Demolition and Excavation: 150,000 Tonnes, Commercial and Industrial: 150,000 Tonnes Hazardous: 5000 Tonnes).

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.**
22. No mitigation measures are proposed.
23. If this planning application is approved, the Atlas Works site will be taking 150,000 Tonnes of Norfolk's 160,000 Tonnes per year of Residual Municipal Waste and nearly **ONE THIRD** of all Norfolk's approximately 1,400,000 Tonnes total waste per year.
24. Should issue arise with this site, if planning permission is granted, GWPC have no confidence in the competence and effectiveness of the existing planning enforcement

agencies. The history of planning applications and enforcement at Clay Hall Farm are material considerations that need to be taken into account in this matter.

Great Witchingham Parish Council object to this planning application in the strongest possible terms and request that it be rejected.

Yours faithfully,

Sonya Blythe
Parish Clerk