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PLANNING STATEMENT

REGENERATION - WOODHURST

THE HEATH, WOODHURST, HUNTINGDON,
CAMBRIDGESHIRE, PE28 3BS

ENVAR COMPOSTING LIMITED

JUNE 2021

Planning Statement		
Regeneration Woodhurst	Envar Composting Ltd	E001-14

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1 INTRODUCTION

1.1 Context

- 1.1.1 This Planning Application (and accompanying Environmental Statement) is submitted to Cambridgeshire County Council (“the Council”) on behalf of Envar Composting Ltd (“the Applicant”) and seeks planning permission for the construction of a Dry Anaerobic Digestion (AD) facility, Pellet Fertiliser Facility, Healthcare Waste Recovery Facility, Waste Transfer Station, Vehicle Re-Fuelling Station and a Biomass Fuel Storage Building, including surface water storage lagoons, extension to concrete pad, demolition of IVC buildings/tunnels and ancillary development at the Applicant’s existing waste management facility, The Heath, Woodhurst, Huntingdon, PE28 3BS.
- 1.1.2 The existing waste management facility currently occupies approximately 11 hectares (ha) within an 18.5 hectares land holding and includes buildings for in-vessel composting (IVC), areas of hardstanding for compost stabilisation and maturation, water storage lagoons, former residential properties used as offices and for educational purposes, litter fencing, landscaped screening bunds, weighbridges and a waste water treatment plant (WWTP).
- 1.1.3 The proposed Dry AD facility will improve the efficiency of organic waste processing, which in terms of policy, moves the waste management facility up the waste hierarchy by generating ‘green’ renewable energy as biogas, as well as quality compost.
- 1.1.4 The process will produce far less difficult-to-dispose of liquid digestate (typically 70% less) than traditional wet AD facilities. Nonetheless, the digestate that is produced will require managing in order to maximise its value and quality. The proposal for an enclosed, environmentally controlled facility, includes a drying system to enable a greater solid fraction of high-quality compost to be produced. This requires approximately 5MW of heat which will be supplied by the Healthcare Waste Energy Recovery Facility, which has been designed to produce the heat requirement for the dryer with healthcare waste being sourced from the wider Cambridgeshire and Peterborough area.
- 1.1.5 The proposed Pellet Fertiliser Facility complements Envar’s compost production by offering a granular fertiliser option in addition to the standard organic soil conditioner. In very simple terms, some of the organic output post digestion through the Dry AD is diverted to the pellet production facility where a specific Nitrogen, Phosphorus and Potassium (NPK) fertiliser product is produced which will match a traditional 100% chemical NPK fertiliser, but with a significantly reduced carbon footprint. This will enable

the Applicant to offer both the soil conditioner, which does provide nutrients but primarily organic matter and the bespoke NPK fertiliser to provide specific nutrient support for plant growth.

- 1.1.6 The proposed waste transfer building will facilitate an additional side of the business, to collect commercial wastes from local businesses in and around Cambridgeshire. One of the primary aims will be to provide a food waste collection service to businesses, especially those using certified compostable packaging for food products as this material is best suited to IVC or Dry AD rather than wet AD. In addition, and to make the business commercially viable, other commercial and industrial (C&D) wastes will be collected, brought back to the transfer building, bulked up and transferred to end re-processors.
- 1.1.7 The proposed woodchip storage building will be used for the storage of clean woodchip, prior to being used as a fuel within the existing biomass facility on the site.
- 1.1.8 The final element of the proposal seeks planning permission for a small-scale Compressed Natural Gas (CNG) fuelling station on the site. The gas fuelling station will utilise biogas that has been produced on site during the Dry AD process to power the Company's fleet of vehicles.
- 1.1.9 The Planning Application submission includes the following information, documents and drawings:

Documents

- Planning Application forms;
- Planning Statement (this document);
- Environmental Statement;
- Non-Technical Summary;
- Statement of Community Involvement;
- Air Quality Assessment (Appendix 4 - Environmental Statement);
- Health Impact Assessment (Appendix 5 - Environmental Statement);
- Noise Assessment (Appendix 6 - Environmental Statement);
- Landscape & Visual Impact Assessment (Appendix 7 - Environmental Statement);
- Need Assessment - (Appendix 2 - Planning Statement);
- Transport Statement and Traffic Management Plan (Appendix 3 - Planning Statement);
- Flood Risk & Drainage Strategy - (Appendix 4 Planning Statement);
- Phase 1 Ecological Survey Appraisal & Bat Survey Report (Appendix 5 Planning Statement), and
- Landscape & Ecological Enhancement Plan - (Appendix 6 - Planning Statement).

Drawings

- GPP/E/CWH/21/01 Rev 03 - Site Location Plan;
- GPP/E/CWH/21/02 Rev 02 – Existing Site Layout Plan;
- GPP/E/CWH/21/03 Rev 11 - Proposed Site Layout Plan
- GPP/E/CWH/21/04 Rev 01 – Elevations and Floor Plan of Healthcare Waste ERF
- GPP/E/CWH/21/05 Rev 03 - Elevations and Floor Plan of Waste Transfer Building
- GPP/E/CWH/21/06 Rev 03 - Elevations and Floor Plan of Biomass Storage Building
- GPP/E/CWH/21/07 Rev 01 - Elevations and Floor Plan of Pellet Fertiliser Production Facility
- GPP/E/CWH/21/08 Rev 00 – Cross Sections, and
- GPP/E/CWH/21/09 Rev 01 – Isometric Model

1.2 Pre-Application Advice

1.2.1 The Applicant received pre-application advice from the Council in writing on 6th August 2020, reference PR/H/4112/20/CW, for the proposed construction of a Dry AD facility and Healthcare Energy Recovery Facility in addition to the existing waste management facility at The Heath, Woodhurst, Huntingdon, PE28 3BS.

1.2.2 The pre-application advice from the Council concludes as follows:

“The NPPF and HLP policy support economic growth and the development of businesses in rural areas and it is noted that around 8 full time jobs would be created. The in vessel composting process is a net consumer of energy whereas treating the same food waste and green waste by AD would generate electricity which would be piped into the grid replacing non-renewable natural gas. This would comply with the broad sustainability aims of national development plan policies in this respect. The properties of clinical waste mean that it cannot be reused or for the most part recycled. It therefore needs to be disposed of safely by landfill or incineration. Using the heat from the combustion process in the proposed incinerator to fuel the proposed AD plant would demonstrate the benefit of co-locating the proposed new waste management facilities as would the addition of the digestate to the windrows for final composting.

1.2.3 *It is my opinion that subject to satisfactory design and it being demonstrated that the proposed AD plant and clinical waste incinerator would be operated without causing unacceptable adverse impacts on human health or amenity or on the natural environment the proposed development could be supported in principle”.*

1.2.4 A copy of the Council’s pre-application advice is attached to this report at Appendix 1.

1.3 The Application Site and its Setting

- 1.3.1 The proposed development will be located towards the northern extent of the site as shown on drawing no. GPP/E/CWH/21/03 Rev11 titled Proposed Site Layout Plan. The Application Site is approximately 8.91 hectares in size and is shown edged red on drawing no. GPP/E/CWH/21/01 Rev03.
- 1.3.2 The developed land includes buildings for in-vessel composting (IVC) and biomass boilers, areas of hardstanding for composting stabilisation/maturation and wood waste storage and processing, water storage lagoons, former residential properties used as offices for educational purposes, concrete storage bays, litter fencing, screening bunds, weighbridges and a waste water treatment plant.
- 1.3.3 The main access into the site for Heavy Commercial Vehicles (HCV's) will be E1 located on the western flank of the site. This is the existing access used by HCV's delivering material. Access E3, also on the western flank, will be used by HCV's exporting material out of the site (as existing) and car parking for staff. Existing entrance E5 will be used by cars and motorcycles for car parking. The other existing entrances around the site (including E2 and E4) will be kept locked/gated and only used for emergency access. The access points are shown on drawing reference 'Proposed Site Layout Plan' reference GPP/E/CWH/21/03 Rev11.
- 1.3.4 The waste management facility is located towards the south westernmost part of the parish of Somersham, approximately 3km south-west of the village. Bluntisham is approximately 2.5km to the east, Woodhurst approximately 1.5km to the north-west and Pidley-cum-Fenton approximately 2.5km to the north.
- 1.3.5 Adjacent land-uses include a redundant mushroom farm to the north-east and agricultural land to the south-east. The north-western boundary is the B1040 St Ives Road, and the south-western boundary is Bluntisham Heath Road, a class C road which runs between Woodhurst and Bluntisham.
- 1.3.6 There are 6 residential units within a travellers' site immediately to the north of the former mushroom farm and 3 residential properties (Rectory Farm and Rectory Farm Cottages) close to the Raptor Foundation. The Raptor Foundation which includes residential properties, a guest house, shops and a tea room is located to the north of the site, on the opposite side of the B1040. A joinery business is located 230 metres to the southwest of the site on Somersham Road. There are no other properties within 500 metres of the Envar site.

- 1.3.7 According to the Environment Agency's floodplain maps, the proposed development is sited outside of both Flood Zone 3 and Flood Zone 2 i.e. it is located in Zone 1 which represents the lowest probability of flooding at a 1:1000 annual probability.

Designations

- 1.3.8 Within 2 kilometres (km) of the Application Site the following designations can be found:

Historic

Listed Buildings

- 2no. Milestones (B1086);
- Granary to Manor Farmhouse (Grade II);
- Manor Farmhouse (Grade II);
- Horseshoe Cottage (Grade II);
- Swans Weir (Grade II);
- Holdick Farmhouse (Grade II*), and
- Chelsea Rest Penny Farthing (Grade II).

Ecological

- The St Ives to March Disused Railway (The Parks South) County Wildlife Site;
- Heath Fruit Farm County Wildlife Site, and
- Lawn Orchard County Wildlife Site.

Landscape

- The site is located within the Bedfordshire and Cambridgeshire Claylands National Character Area (NCA).

Public Rights of Way

- No Public Rights of Way (PRoW) are affected by the proposal.

1.4 Planning History

- 1.4.1 The existing waste management facility has a long and complex planning history associated with the site, which can be summarised as follows:

- H/1011/92/CW – Composting to produce a peat substitute from organic vegetable waste (granted on 8/12/1999 – not implemented);
- H/0739/94/CW – Extension to composting building (granted on 11/10/1994);
- H/5023/02/CW – Concrete apron for the preparation of green waste (granted on 7/11/2002 – not implemented);
- H/5005/04/CW – Extension of an existing building to enclose 8 existing composting tunnels; composting of organic feedstocks to produce compost for agriculture, horticulture and landscaping; establishment of ADAS Composting Research Project (granted on 15/07/2004 – subject to S106 agreement dated 14/07/2004);
- H/5021/05/CW – Change of use of Heath Tops from residential to part residential and part educational facility and offices (granted 12/12/2005);
- H/5003/06/CW – Replacement building to contain four enclosed composting tunnels (granted 22/05/2006);
- H/5000/07/CW – Erection of semi-permanent office building (granted 12/06/2006; temporary permission expired 30/04/2012);
- H/5001/07/CW – Plant to treat waste water from composting site (granted 26/03/2007);
- H/5002/07/CW – Cladding of open barn to provide enclosed composting building (granted 26/03/2007);
- H/5005/07/CW – Extension of concrete pad for maturation of compost (granted 11/04/2007 – not implemented);
- H/5015/09/CW – Erection of three composting tunnels and waste reception building (granted 14/09/2009 – not implemented);
- H/5037/09/CW – Variation of Condition 7 of H/5005/04/CW to state ‘No vehicle shall enter or leave the site except between the hours of 0700 and 1800 Mondays to Fridays except Public Holidays and 0700 and 1330 on Saturdays. Working on site shall take place between the hours of 0700 and 1800 on any day of the week’ (granted 4/01/2010);
- H/5021/11/CW – Demolition of old composting tunnels and ancillary structures; extension to waste reception building; new building to house new composting tunnels, bio-filters & manoeuvring area; covered link to connect buildings; relocation of weighbridge and office; alteration of access to B1086 (granted 7/06/2012);
- H/5003/12/CW – Extension of concrete pad for maturation of compost with drainage balancing lagoons, reed bed; perimeter earth bunds screening (granted 7/06/2012);
- H/5000/14/CW – Erection of 4m high litter-net fencing (granted 16/05/2014);

- H/5001/14/CW – Construction of a waste water lagoon, additional discharge tank to waste-water treatment plant and buffer tank for rain-water harvesting (part retrospective) (granted 11/09/2014);
- H/5007/17/CW – S73 Planning Application to develop land without complying with conditions 2 and 5 of planning permission H/05021/11/CW to allow alternative access arrangements (granted 2/11/2017);
- H/5004/17/CW – S73 Planning Application to develop land without complying with condition 7 of planning permission H/05037/09/CW to extend the hours of operation including vehicle movements to 0500 to 2200 hours daily (granted 2/11/2017);
- H/5005/17/CW – Change of use of existing building and adjacent land from composting and maturation of compost to recovery of waste in biomass boilers, drying waste, storage of biomass and drying material and bulking up and shredding waste wood (part retrospective) (granted 2/11/2017);
- H/5006/17/CW – Section 73 planning application to develop land without complying with condition 2 of planning permission H/05003/12/CW (Extension of concrete pad for maturation of compost with drainage balancing lagoons, reed bed; perimeter earth bunds [for] screening) to extend concrete pad into area of balancing lagoon (granted 8/11/2017), and
- H/5005/17/CW/N1 – Non-material amendment to the site layout plan to allow changes to the position of the internal access road, earth bund, weighbridges and weighbridge office (granted 4/5/2018).

2 ENVIRONMENTAL IMPACT ASSESSMENT

2.1 EIA Regulations 2017

2.1.1 The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 set out descriptions of Schedule 1 developments for which Environmental Impact Assessment (EIA) is mandatory and a list of Schedule 2 developments for which an EIA may be required.

Schedule 1

2.1.2 Schedule 1 identifies 24 different categories of development in which EIA is mandatory.

Schedule 2

2.1.3 The basic test of the need for an EIA in a particular case is the likelihood of significant adverse effects on the environment by virtue of factors such as its nature, size and location.

2.1.4 The National Planning Practice Guide (NPPG) at paragraph 017 Reference ID: 4-017-20170728 confirms that *“if a proposed project is listed in the first column in Schedule 2 of the 2017 Regulations and exceeds the relevant thresholds or criteria set out in the second column (sometimes referred to as ‘exclusion thresholds and criteria’) the proposal needs to be screened by the local planning authority to determine whether significant effects on the environment are likely and hence whether an Environmental Impact Assessment is required. Projects listed in Schedule 2 which are located in, or partly in, a sensitive area also need to be screened, even if they are below the thresholds or do not meet the criteria”*.

2.2 Screening – Schedule 1

2.2.1 Schedule 1, paragraph 9 relates to the disposal of waste and states *“waste disposal installations for the incineration, chemical treatment or landfill of hazardous waste as defined in Article 3(2) of that Directive”*. This Planning Application, in part, proposes to dispose of hazardous waste (clinical) through incineration, and is therefore listed as Schedule 1 development for the purposes of the EIA Regulations 2017.

2.2.2 The proposed development is therefore Schedule 1 development where the submission of an Environmental Statement (ES) is a mandatory requirement.

2.3 EIA Scoping

- 2.3.1 In order to establish the scope of the EIA, a formal Scoping Opinion request was submitted to the Council on 28 July 2020.
- 2.3.2 The NPPG at paragraph 035 Reference ID: 4-035-20170728 states that *“whilst every ES should provide a full factual description of the development, the emphasis should be on the ‘main’ or ‘significant’ environmental effects to which a development is likely to give rise. The ES should be proportionate and not be any longer than is necessary to assess properly those effects”*.
- 2.3.3 The formal Scoping Opinion is appended to the accompanying ES at Appendix 1. The Council concluded that the following main environmental topics should be the subject of the EIA:
- Air quality (including odour and dust);
 - Human health (including noise), and
 - Landscape and visual impact.

3 EXISTING AND PERMITTED DEVELOPMENT

3.1 Introduction

- 3.1.1 The Applicant's existing waste management facility has a long planning history, which has resulted in the grant of planning permissions for a number of development proposals across the site. The existing waste management facility currently covers approximately 11 hectares within an 18.5-hectare land holding (shown edged blue) on the 'Existing Site Layout Plan' drawing GPP/E/CWH/20/02 (Existing Site Layout Plan).
- 3.1.2 A brief description of the existing permitted development on the site is set out below and key components referenced according to labels on the Existing Site Layout Plan drawing GPP/E/CWH/20/02 Rev02.

3.2 Key Site Infrastructure

- 3.2.1 There are two main access/egress points on the western boundary of the site off of the B1040 St Ives Road and 1 on the southern boundary off of Bluntisham Heath Road. The other accesses around the sites have been gated and locked and will only be used for emergency access.
- 3.2.2 The site has 2 offices (marked as 1 and 5), a welfare building (6), a weighbridge area (4) and associated weighbridge office (7) together with a workshop building (8). There are currently 4 surface water lagoons that manage surface water across the site.

3.3 In-Vessel Composting (IVC) Facility

- 3.3.1 The IVC facility consists of a number of buildings, 'tunnels' (10) and structures including a biofilter (9) used to receive, process and compost green and food waste at the site. This built infrastructure will be removed to make way for the proposed Dry AD Plant. The composting waste materials are taken to adjacent hardstanding areas for compost stabilisation and maturation (11).
- 3.3.2 The throughput of composting material across the site as a whole is restricted by the extant planning permission to a maximum of 135,000 tonnes of waste material per annum corresponding to an upper limit of 120 Heavy Good's Vehicles in and 120 Heavy Good's Vehicles out (240 HGV movements).
- 3.3.3 The IVC Facility produces high quality compost for agricultural and horticultural use that is made to Compost Protocol standards and PAS100, allowing materials to leave the site as a product, not a waste.

All of the compost produced at the site is used by both local farmers horticultural users and is in high demand.

3.4 Hardstanding for Composting Stabilisation & Maturation

3.4.1 The Applicant's composting facility includes a large concrete impermeable pad where composted material is taken to stabilise and mature in open windrows (11).

3.5 Waste Transfer Building

3.5.1 The site has planning permission (reference H/5015/09/CW) for a waste transfer operation for bulking-up various waste streams (e.g. cardboard, food waste, wood, plastic, paper) for onward transfer to specialist waste management facility. The throughput of material is in the order of 20,000 tonnes per annum. The deposit, bulking-up and transfer of waste takes place within the existing waste reception building (identified as no.20 on the Existing Site Layout Plan drawing reference GPP/E/CWH/20/02).

3.6 Biomass Boiler and Ancillary Development

3.6.1 The site benefits from planning permission (reference H/5005/17/CW) for two small scale biomass boilers for the drying of virgin wood, external flue stacks, concrete hardstanding and biomass feed hoppers. Each biomass boiler has a thermal capacity of 999kW and is contained within an existing mono pitched lean to building (21). The existing lean-to measures approximately 20.4m in length x 6.8m in width x 5m in height (at the highest point).

3.6.2 Two cylindrical exhaust flues stand at a maximum of 9.8m in height (above ground level) and are connected to the boiler units. Each exhaust flue is approximately 2m above the ridge height of the adjacent building.

3.6.3 Pre-chipped Grade A waste wood or virgin wood is used to fuel the biomass boilers. Beyond the wood chip feed conveyors, consistent delivery is ensured by a fuel feeding screw which feeds the chipped wood into the boiler chamber for combustion. The heat generated by the combustion process is directed to the heat exchanger which in turn heats water. Hot water is then transferred via pipework (flow and return) to heat the Dryer Units (number on plan). The biomass boilers operate 24 hours a day.

3.6.4 There are two covered feed hoppers with walking floors located adjacent to the northern façade of the lean to on the outside of the building (13). The feed hoppers ensure the steady supply of wood chip to the biomass boilers via a conveyor system. Each feed hopper measures approximately 6m in length x 2.4m

in width x 3.6m in height. In addition, there are two drying material feed hoppers of similar size located adjacent to the eastern façade of the building (22).

3.7 Waste Water Treatment Plant

- 3.7.1 In March 2007, planning permission (reference H/5001/07/CW) was granted for the installation of a waste water treatment plant (12), which has now been built and is operational. Surface water from the waste processing areas and maturation yard is collected through a series of surface water attenuation lagoons. The waste water treatment plant is designed to process and treat surface water to enable it to be discharged to the local water course via a discharge consent approved by the Environment Agency.

4 PROPOSED DEVELOPMENT

4.1 Introduction

4.1.1 This Planning Application seeks planning permission for the construction of the following at the Applicant's existing waste management facility - The Heath, Woodhurst, Huntingdon, PE28 3BS:

- i) Dry Anaerobic Digestion (AD) Facility;
- ii) Healthcare Waste Energy Recovery Facility (ERF);
- iii) Pellet Fertiliser Production Facility;
- iv) Vehicle Re-Fuelling Station;
- v) Waste Transfer Station, and
- vi) Woodchip Biomass Fuel Storage Building

4.1.2 The proposed development therefore contains 6 main elements. In addition to the main built elements, the proposal also involves the construction of four replacement surface water lagoons to manage surface water run-off and demolition of the existing IVC buildings and tunnels.

4.1.3 The Dry AD facility, Healthcare Waste ERF and Pellet Fertiliser Production Facility are inter-connected and have co-location benefits (predominantly heat and power). The main elements are described separately below.

4.1.4 The planning application boundary is shown edged red on drawing GPP/E/CWH/21/01 Rev3 – Site Location Plan. Other land within the Applicant's ownership is shown edged blue on the same drawing. The proposed layout of the development is shown on the enclosed 'Proposed Site Layout Plan' reference GPP/E/CWH/21/03 Rev11. Drawing GPP/E/CWH/21/08 Rev00 shows four cross sections through the site and GPP/E/CWH/21/09 Rev01 shows an illustrative 3D model of the proposed development.

4.1.5 The Applicant's existing site benefits from planning permission for the storage of biomass woodchip fuel and a waste transfer station operation. Those elements of the proposal are therefore being relocated to accommodate the construction of the proposed Dry AD Plant and Healthcare Waste Energy Recovery Facility. The existing IVC tunnels will be removed to make way for the proposed Dry AD Plant. Further details, with reference to the Proposed Site Layout Plan are set out below.

4.2 Description of Development

4.2.1 The proposed description of development is as follows:

“Construction of a Dry Anaerobic Digestion (AD) facility, Pellet Fertiliser Facility, Healthcare Waste Recovery Facility, Waste Transfer Station, Vehicle Re-Fuelling Station and a Biomass Fuel Storage Building, including surface water storage lagoons, extension to concrete pad, demolition of IVC buildings/tunnels and ancillary development at the Applicant’s existing waste facility, The Heath, Woodhurst, Huntingdon, PE28 3BS.”

4.3 Drawings

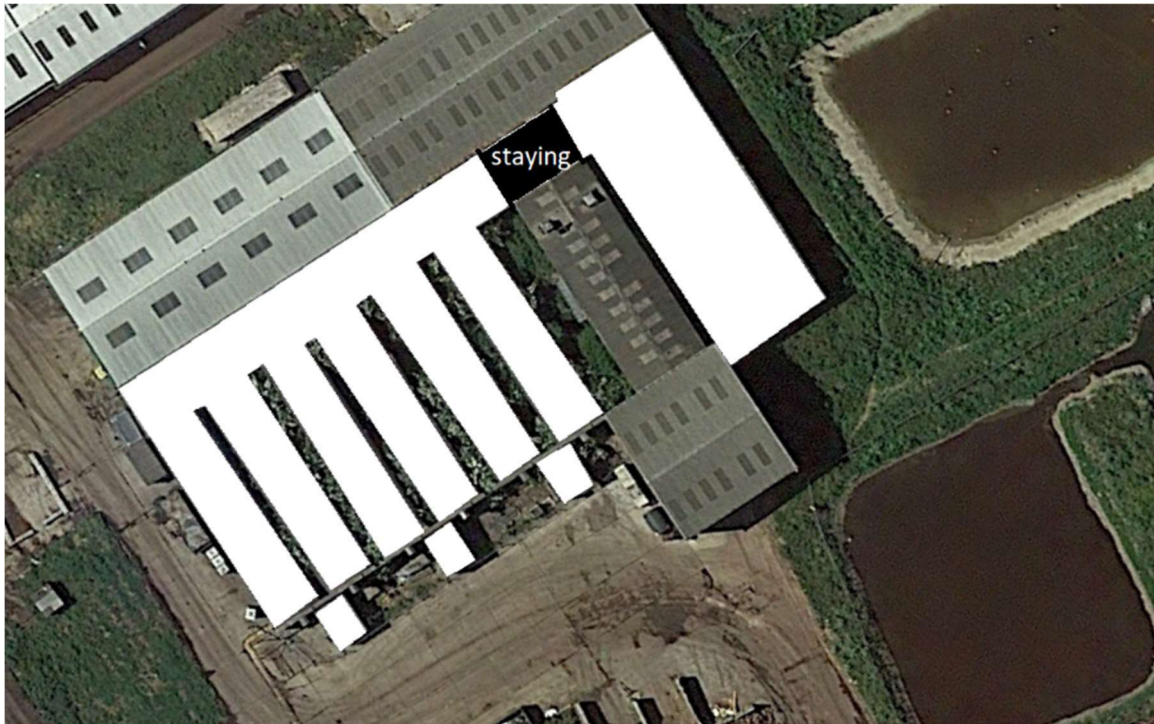
4.3.1 The main elements of the proposed development are shown on drawing(s):

- Site Location Plan - GPP/E/CWH/21/01 Rev3
- Existing Site Layout - GPP/E/CWH/20/02
- Proposed Site Layout Plan - GPP/E/CWH/21/03 Rev 11
- Elevations and floor plan of the Healthcare Waste ERF Building - GPP/E/CWH/21/04 Rev01
- Elevations and floor plan of the Waste Transfer Station - GPP/E/CWH/21/05 Rev03
- Elevations and floor plan of the Biomass Woodchip Building GPP/E/CWH/21/06 Rev03
- Elevations and floor plan of the Pellet Fertiliser Production Facility - GPP/E/CWH/21/07 Rev01
- Cross sections - GPP/E/CWH/21/08 Rev00
- 3D model of the Proposed Development – - GPP/E/CWH/21/09 Rev01

4.4 Demolition of IVC Facility

4.4.1 The IVC facility consists of a number of buildings, tunnels and structures. There are 6no. tunnels, a central and end ‘lean-to’ structure and 3no. brick-built fan buildings, which will be demolished. There is also an existing building adjacent to the existing lagoon (circa 400 square metres in size) which will also be removed to make room for the 2no. Combined Heat & Power Plants.

4.4.2 The aerial photograph below shows the buildings and structures ‘blocked out in white’ which will be removed to make way for the construction of the proposed Dry AD plant and associated infrastructure.



4.5 Proposed Scheme Details

i) Dry AD Facility

Overview

4.5.1 The proposed Dry AD Plant (items 31-43 on the Proposed Site Layout Plan) will process imported co-mingled food and green waste. The waste will be biologically processed via the introduction of anaerobic bacteria. This will create a usable bio-methane product which will be pressurised, cleaned, and fed into the national gas grid (via an underground pipeline adjacent to the site) as a source of renewable power replacing finite fossil fuels. At the end of the process, the food and green waste mix having been dried (using two belt-driers), is deodorised and composted in the maturation stage which is transformed into a nutrient rich sustainable fertiliser product for use on local farms and horticulture and landscape markets.

Plant, Equipment and Buildings

4.5.2 The main plant, equipment, and buildings associated with the Dry AD facility are listed below:

- Food and green waste reception area (AD Building) (36)
- Dewatering equipment located in dewatering area
- x2 Digesters and associated equipment in dry digestate storage (38 and 39)
- X3 Liquid waste tanks and associated equipment (outside AD Building)

- x2 Belt dryers and associated equipment located in drying area (37)
- Dried digestate storage area (37)
- Air Treatment Equipment and Biofilter (35)
- Biogas storage system (41)
- Biogas Upgrading Unit (BUG) (43)
- X2 Combined Heat & Power Plants (40)
- Biomethane Storage Tank (42)
- x2 Emergency Flares (45)
- Grid Entry Unit (31)

4.5.3 The proposed Dry AD Facility is shown as item 36 on the enclosed 'Proposed Site Layout Plan reference GPP/E/CWH/21/03 Rev11. This drawing shows the location of the main plant, equipment, and buildings associated with the Dry AD facility. Four cross sections of the proposed development, including the Dry AD Facility within the Application Site are shown on drawing reference GPP/E/CWH/21/08 Rev00.

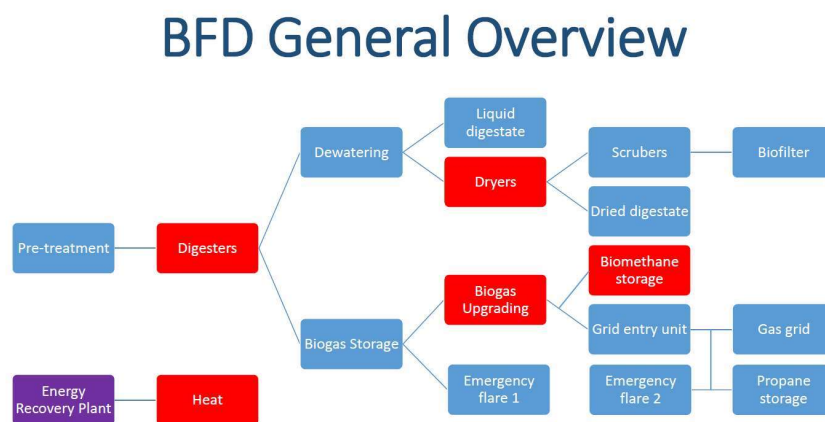
Site Operations and Process Description

- 4.5.4 The AD process uses drying equipment within a sealed and enclosed building. Anaerobic digestion (AD) technology has been around for some time and most UK AD plants are 'wet' plants. The material which is processed and pumped through most UK plants is a liquid at a nominal 15% solids, free flowing and at large volumes due to the high liquid levels. This makes it difficult to store and use in large amounts.
- 4.5.5 By contrast the proposed, proven, Dry Anaerobic Digestion technology uses an organic feedstock material which has a much higher solid content (nominally 55%). It is moved via a screw which transits a plug flow along a digestion vessel. Input material can receive an amount of recirculated digestate at the infeed point to 'kick-start' the AD process resulting in the rapid production of biogas and short residence time in the digester in a system. The process results in a typical efficiency of around 90% harvesting as much of the available biogas as is realistically possible. Fully enclosed and sealed, the extraction of biogas is prepared for injection into the national grid.
- 4.5.6 The material processed by the proposed Dry AD process is also more flexible in that a more fibrous material can be processed with greater ease. This makes it more marketable and can attract feedstock with less preparation. A mixture of green and food waste can be processed through the Dry AD Plant (compared to wet AD which uses primarily food only). The extraction of the biogas during this process is significant when compared to wet AD plants, with the ability to extract around 90% compared to the 60% biogas.

4.5.7 The final material arising from the Dry AD process is dried using recovered heat from the Healthcare Waste ERF. This drying process removes both odour and water leaving a nutrient rich material which can be further composted and stabilised into a quality pelletised product. The pelletised product is a sustainable alternative to fossil fuel and heavy chemical fertilisers, boasting water retention, drainage, compaction reliving and soil biology enhancing properties.

4.5.8 The main inputs to the process are recovered heat from the ERF which is used to power the biological processes and electricity to drive the motors. Electricity will be provided by the proposed two x one megawatt combined heat and power (CHP) units (40) which are designed to produce enough power to run most activities on site. In addition to the electricity that is produced, the CHP engines also produce usable heat. The heat is extracted from the water jacket of the combustion engine itself and also from the flue gasses. By extracting usable heat from both sources, the proposal ensures that the full potential of the gaseous fuel is used and not wasted to the atmosphere (common in many power generation developments both small and large).

4.5.9 An overview of the process is depicted in Block Flow Diagram (BFD) below:



Feedstock Quantities & Outputs

4.5.10 The Dry AD facility will process approximately 70,000 tonnes of imported green and food waste per year. Following the anaerobic digestion and maturation process, approximately 50,000 tonnes of nutrient rich compost material will be exported from the site as a fertiliser and soil improver.

Operating Hours

Importation of Feedstock

4.5.11 The deliveries of feedstock and the export of digestate will take place between the following hours:

- 05.00 to 22.00 daily including Sundays and Public/Bank Holidays

Feedstock Processing

4.5.12 The facility will process feedstock 24 hours a day, 7 days a week. It will operate continuously throughout the year except during shutdowns for maintenance purposes.

Environmental Controls

4.5.13 The principal potential sources of odour from the proposed Dry AD Facility are likely to be from the following main elements:

- Waste reception, dewatering, drying, storage and handling (AD Building).
- Waste processing machinery.
- Emissions from the CHP engines
- Emissions from the biofilter.

4.5.14 In order to mitigate odour, the AD building will be fully enclosed, under negative pressure and the resultant exhaust air will undergo treatment. The air is extracted at chosen points distributed around the Dry AD building, allowing a good and uniform air circulation inside it. Additionally, the processing machinery will be directly or indirectly connected to the air treatment system.

ii) Healthcare Waste Energy Recovery Facility

Overview

4.5.15 Many Healthcare Waste ERF's around the UK are built with the sole purpose of safely disposing of healthcare waste but rarely include any capability to recover potentially useful heat and power from the process. Clearly to ensure safe destruction of pathogens, which given the pandemic is even more critical than before, high temperatures are required. Healthcare Waste ERF's use a huge amount of energy to reach high temperatures in excess of 1200 degrees Celsius, so it makes sense to utilise this heat wherever possible. The plant will be designed to deal with healthcare waste arising from within the region and sized primarily to use all the waste heat produced. This means that the plant will be a relatively small size with a throughput of approximately 12,000 tonnes per annum.

Proposed Energy Recovery Facility (ERF)

4.5.16 The proposed Healthcare Waste ERF consists of a new building to the north of the existing IVC facility (46). The proposed new building will house a thermal treatment process which will safely handle healthcare waste and other difficult wastes streams that are not capable of being recycled.

4.5.17 The treatment process will be permitted by the Environment Agency as a Waste Incineration Activity and will be operated in accordance with the Environmental Permitting Regulations 2016 (as amended) and Chapter IV of the Industrial Emissions Directive (IED).

4.5.18 The plant will enable the recovery of energy in the form of heat and power. The Healthcare Waste ERF will supply heat to the Dry AD plant using heat transfer equipment available as part of the proposed development.

4.5.19 There will be a yard surrounding the Healthcare Waste ERF building for manoeuvring and parking, and an area for gas handling equipment to enable efficient operation of the system. There will be an associated exhaust flue. The waste handling and thermal treatment process is entirely enclosed from start to finish to comply with appropriate regulations; no handling, processing or storage will take place outside.

Plant, Equipment and Buildings

4.5.20 The proposed Healthcare Waste ERF is shown as item 46 on the enclosed 'Proposed Site Layout Plan reference GPP/E/CWH/21/03 Rev11.

4.5.21 The main plant, equipment, and buildings associated within the Healthcare Waste ERF are:

- The reception and storage of clinical waste;
- Bin movement and clean-up;
- The combustion of clinical waste;
- The reception, emulsification and combustion of waste oil;
- Waste heat recovery system;
- Screw expander turbine;
- Air Pollution Control System;
- Bottom ash removal system;
- Filter fly ash removal system; and
- Continuous Emissions Monitoring System.
- Emissions stack

Building

4.5.22 Elevations of the Healthcare Waste ERF are shown on the enclosed drawing GPP/E/CWH/21/04 Rev01. Four cross sections of the proposed development, including the Healthcare Waste ERF within the Application Site are shown on drawing GPP/E/CWH/21/08 Rev00.

4.5.23 The Healthcare Waste ERF will be housed within a steel portal framed building which will be 53 metres long and 39 metres wide. The height of the building will be 8.7 metres to the eaves and 10 metres to the ridge. The building will clad with box profiled steel cladding coloured dark green to assimilate into the existing complex and surrounding landscape. The building will contain a stack which will be 26 metres high from ground level.

Site Operations and Process Description

4.5.24 The operational system comprises two sections, the primary combustion chamber where the solid waste is destroyed and the secondary combustion chamber where combustion products are thermally treated and oxidised. Waste is only introduced into the primary combustion chamber once sufficient temperatures have been reached. The auxiliary fuel used is oil and waste oil. The waste oil is emulsified on site which will be used to supplement combustion once the chamber is above a temperature of at least 850°C.

4.5.25 Within the primary combustion chamber, the waste progresses over two hydraulically driven stepped hearths. Bottom ash is collected and quenched prior to transfer offsite for disposal at an appropriately permitted facility. The hot gases produced from the primary combustion chamber are transferred to the secondary combustion chamber for thermal oxidation.

4.5.26 The secondary combustion chamber serves to provide the necessary temperature and residence time conditions (greater than 2 seconds at 1,100°C) to meet with the Industrial Emissions Directive (IED). Hot gases from the secondary combustion chamber are then transferred to the waste heat boiler via a hot gas duct. All steam produced by the waste heat boiler is directed through two screw expander turbines to generate electricity for export and site parasitic requirements.

4.5.27 The energy recovery plant is expected to process up to 2,000 kg of waste per hour. Delivered feedstock will not be stored for longer than 24 hours, however, in the case of a bank/public holiday weekend, waste may need to be stored for up to 4 days.

4.5.28 Healthcare waste will either be delivered to site in sealed clinical waste bins or in double sealed bags. Waste feedstock material will be manually loaded into the container management system using a forklift vehicle or grab. A container lift will empty the material into the feed hopper and is then mechanically fed into the primary combustion chamber. The container will then be transferred to the container wash for disinfection. The energy recovery plant will also take liquid waste that requires treatment, and this will be injected into the treatment process.

Source/Catchment of Feedstock

4.5.29 Waste feedstock material will be sourced, as far as possible, from within the County of Cambridgeshire and the Peterborough area. The Healthcare Waste ERF will only receive waste material secured under a contract with the Applicant. This facility will not be open to the public or businesses/trade.

Types of Waste and Quantities

4.5.30 In order to operate the proposed facility, a bespoke Environmental Installation Permit will be required to be obtained from the Environment Agency. The Permit will strictly control the type and amount of waste that can be handled at the site.

4.5.31 The proposed facility will process and recover energy from approximately 12,000 tonnes of waste per annum (approximately 50 tonnes per day).

4.5.32 It will manage the following types of waste:

- **Health Care Waste:** Health care waste is produced by organisations providing health and social care, or in a person's own home where health and social care is provided.
- **Hazardous Waste:** which includes waste matter, or components of that waste, that can cause harm to the environment or human health. This may cause the waste to be classified as hazardous. Some examples of common types of hazardous waste found in everyday health care activities are: medicines, needles or suture needle, incontinence pads, soft waste, such as dressings
- **Hygiene Waste:** defined within the Controlled Waste Regulations as waste that:
 - i. Is not clinical waste,
 - ii. contains body fluids, secretions, or excretions,
 - iii. is classified under specific codes in the List of Wastes Regulations
 - iv. Medicinal waste, which can be defined as either medicines that can no longer be unused (e.g. out-of-date stock or items contaminated with medicines.
- **Law Enforcement Confiscated Material:** that has been seized or detained by the Police, Border Force, HM Revenue and Customs (HMRC) and the National Crime Agency (NCA). Examples of such seizures include excise goods (cigarettes, tobacco and alcohol), firearms and prohibited drugs.

Residual Waste

4.5.33 The main residual waste at the end of the waste recovery process is incinerator bottom ash (IBA) and air pollution control residues (APC) waste from the energy conversion processing units. There will be approximately 2 tonnes of IBA per day and 28 tonnes of APC per month equating to approximately 1320 tonnes per annum in total. The residual waste will be conveyed to a sealed skip. Once full, the skip will be

taken off-site to a suitably licensed waste management facility for disposal and new skip located in its place (once or twice per week). Skips containing APC residues consisting of contaminated lime and spent carbon pellets will be collected by a specialist contractor on a weekly or fortnightly basis as required. IBA and APC removal collections will be scheduled on different days where possible to minimise vehicle movements.

Transportation of Material

- 4.5.34 Waste feedstock material will be transported to the Healthcare Waste ERF, predominantly by specialist light good vehicles and vans (approximately 1-2 loads per hour). Bulk loads of material in articulated lorries are unlikely to exceed 2 delivered loads per day. The feedstock material will be delivered within the energy recovery facility building and no material will be handled or stored outside.
- 4.5.35 After processing, a residual waste ash will be exported from the site (in bulk loads) which approximately once per week.

Operating Hours

Importation of Waste

- 4.5.36 The delivery of waste for treatment within the Healthcare Waste ERF will take place between the following hours:
- 05.00 to 22.00 hours daily including Sundays and Public/Bank Holidays

Treatment of Waste

- 4.5.37 The facility will process feedstock 24 hours a day, 7 days a week. It will operate continuously throughout the year except during shutdowns for maintenance purposes.

Environmental Controls

- 4.5.38 Flue gas cleaning and pollution control consists of Selective Non-Catalytic Reduction (SNCR) through urea injection within the combustion chambers, sodium bicarbonate injection for acid gas neutralisation, and activated carbon powder injection for absorption and removal of heavy metals, dioxins, Volatile Organic Compounds (VOCs) and other harmful substances.

iii) Pellet Fertiliser Production Facility

Overview

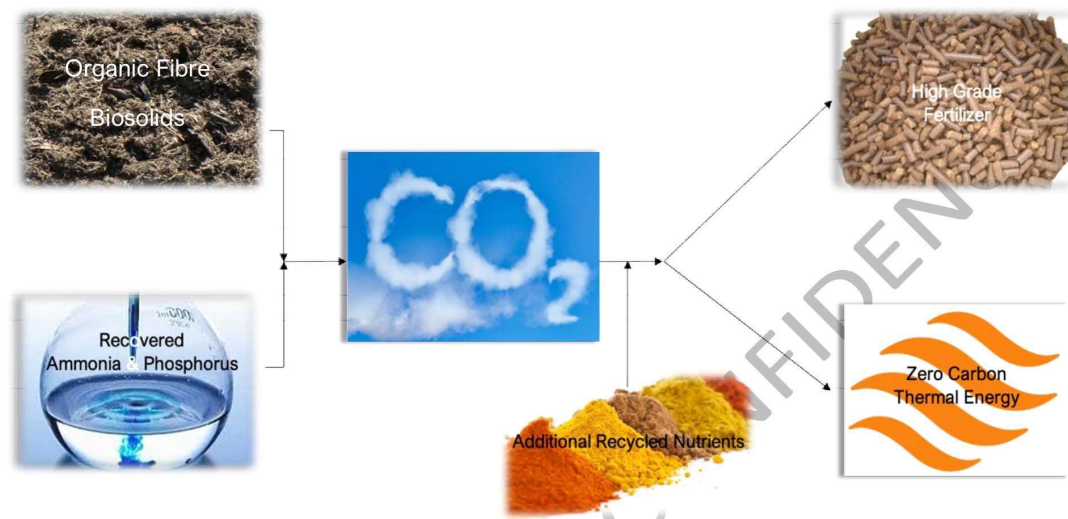
- 4.5.39 The proposed Pellet Fertiliser Plant (building 47 on the Proposed Site Layout Plan) complements the Applicant's existing compost production by offering a granular fertiliser option in addition to the standard organic soil conditioner. The technology captures carbon dioxide from sources ranging from combustion flue gas to biogas separation. The captured CO₂ is used to stabilise ammonia plus further nutrients can be added from waste or recycled materials with the formulation adjustable to utilise particularly abundant feedstocks or achieve a specific balance. The process requires some heat as part of the production, however, there is sufficient heat from the various associated site processes as illustrated on the heat process block diagram.
- 4.5.40 In simple terms, some of the organic output post digestion through the Dry AD is diverted to the pellet production facility where a specific Nitrogen, Phosphorus and Potassium (NPK) fertiliser product is produced which will match a traditional 100% chemical NPK fertiliser, but with a significantly reduced carbon footprint.
- 4.5.41 Most farmers need to use a traditional NPK fertiliser. This will enable the Applicant to offer both the soil conditioner, which does provide nutrients but primarily organic matter and the bespoke NPK fertiliser to provide specific nutrient support for plant growth.

Building

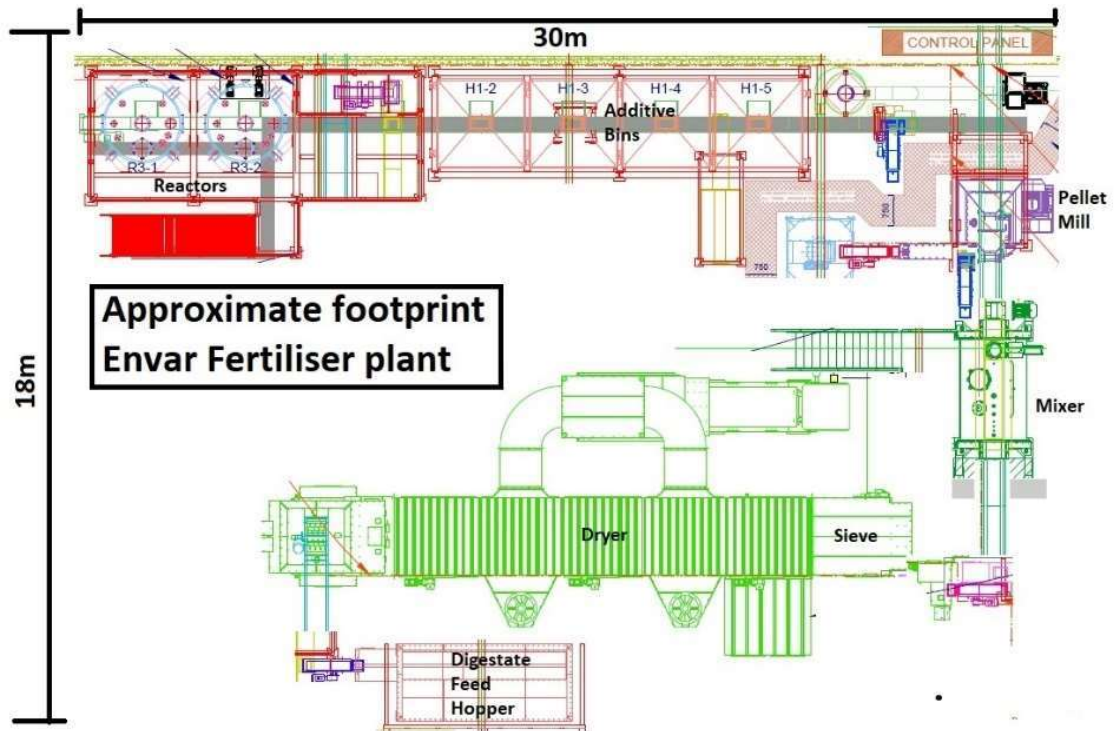
- 4.5.42 Elevations of the Pellet Fertiliser Production Facility are shown on the enclosed drawing GPP/E/CWH/21/07 Rev01. Four cross sections of the proposed development, including the Pellet Fertiliser Production Facility building within the Application Site are shown on drawing GPP/E/CWH/21/08 Rev00.
- 4.5.43 The Pellet Fertiliser Production Facility will be housed within a steel portal framed building which will be 70 metres long and 40 metres wide. The height of the building will be 9.0 metres to the eaves and 11 metres to the ridge. The building will have 6 roller shutter doors to provide access/agrees and will be clad with box profiled steel cladding coloured dark green to assimilate into the existing complex and surrounding landscape. Elevations of the proposed building are shown on drawing Elevations and a floor plan of the proposed building are shown drawing GPP/E/CWH/21/07 Rev01.

Pellet Fertiliser Plant

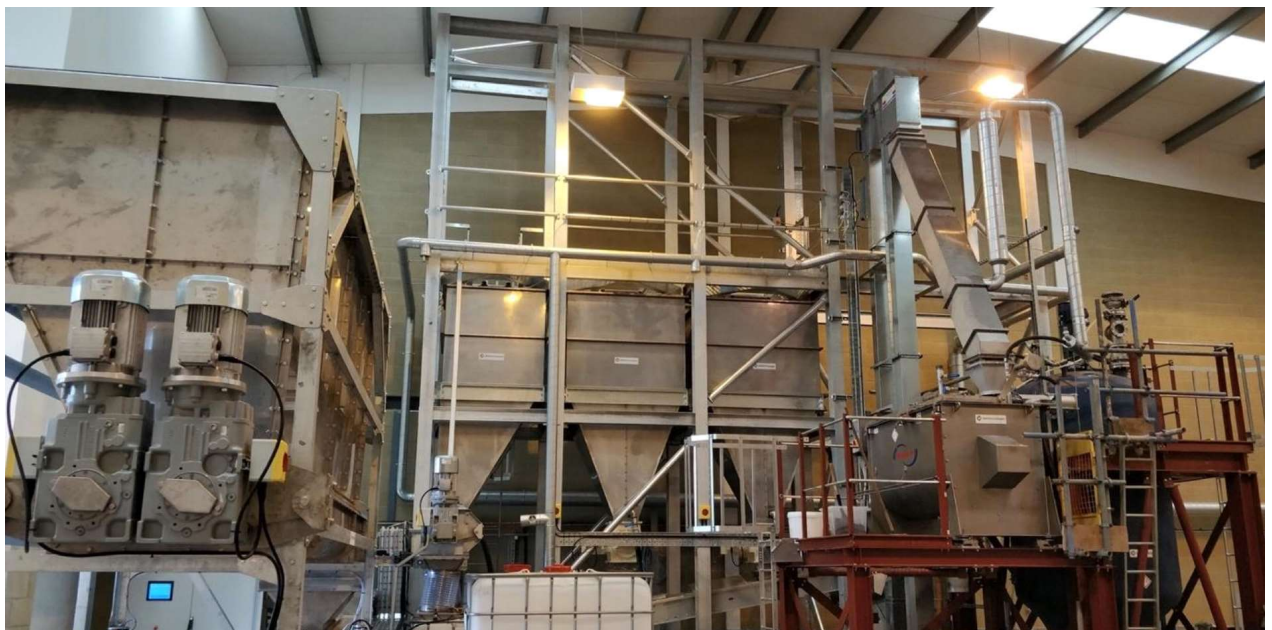
4.5.44 The process at the centre of the fertiliser production system is relatively simple. It combines an organic fibre, Ammonia and CO₂. The ammonia acts as a Nitrogen source for the plants and allows the capture of, which in turn stabilises the ammonia allowing it to be converted into a more useful form. This step is potentially followed by the addition of further nutrients to supplement those held with the feedstock streams that are feeding the process and allow the production of the desired end formulation of N, P and K. An illustrative process diagram is set out below.



4.5.45 The products created by the process are in essence packages of plant nutrients harvested from existing anaerobic digestion operations. By packaging the nutrients in user-friendly formats bound together by carbon captured from the proposed biogas handling processes, the Applicant proposes to create a new range of biogenic fertilisers. Importantly these materials are all user friendly and can be delivered to the local market using conventional agricultural equipment. An illustrative diagram of the layout of the plant within the building is shown below.



4.5.46 The supplier of the Pellet Fertiliser Plant has a commercial scale demonstration plant, which is fully operational. A photograph of the type of plant that will be located inside the building is shown below. This plant can produce a range of fertiliser products varying in Nitrogen content between 30%N to 4%N; in formats ranging from compound pellets through to organic-based loose material and liquids.



Carbon Capture

4.5.47 The carbon savings result from the direct capture of CO₂ during the production process; the replacement of high carbon intensity inputs by recovered ones, which produces a large avoidance of primary carbon use; and finally, the retention of robust carbon based materials within the fertiliser matrix ensuring high levels of carbon retention in soil.

Operating Hours

4.5.48 The Pellet Fertiliser Production Facility will operate between the following hours:

- 05.00 to 22.00 hours daily including Sundays and Public/Bank Holidays

Traffic Movements

4.5.49 The Pellet Fertiliser Production Facility will utilise some of the material that has been through the Dry AD Plant. There will be no additional throughput of material as a result of this process. The exportation of the pellet fertiliser product will replace a proportion of the traffic that will be associated with the exportation of the compost product from site and therefore the plant will not generate any additional traffic movements.

iv) CNG Vehicle Fuelling Station

4.5.50 The biogas produced by the proposed Dry AD facility will, in addition to being exported to the National Grid, be capable of being used as an alternative fuel to diesel for the Applicant's fleet of commercial vehicles. The biogas will be stored in the storage vessel (41 on the Proposed Site Layout drawing reference GPP/E/CWH/21/03 Rev11).

4.5.51 The proposal therefore includes a small-scale Compressed Natural Gas (CNG) Refuelling Station, which will be located to the north-east of the access into the site (see key 29 on the Proposed Site Layout drawing reference GPP/E/CWH/21/03 Rev11). The CNG Refuelling Station will not be open to the general public.

4.5.52 The proposed CNG Refuelling Station will be similar to the station depicted in the photograph below.



v) Waste Transfer Station

Overview

4.5.53 The Applicant proposes to relocate the existing waste transfer operation within a new purpose-built steel portal frame building (28). The waste transfer operation will only involve the transfer and bulking of waste. There will therefore be no processing or treatment of waste within the building. Planning permission for the existing waste management facility was granted under the auspices of permission reference H/5005/17/CW dated 8th November 2017.

Waste Transfer Station Building

4.5.54 The proposed waste transfer station building will have a steel portal frame construction and clad in box profiled cladding coloured dark green. The building will be used for the tipping of imported waste, bulking up and exportation from the site in bulk loads. There will be 3x roller shutter doors; one for in-coming waste, a second for outgoing waste and a third for loading out vehicles. The building will have dimensions of 70 metres long by 40 metres wide and 10 metres high to the ridge (8 metres high to the ridge). Elevations and a floor plan of the proposed building are shown drawing GPP/E/CWH/21/05 Rev3.

Storage and Management of Waste (Loading and Unloading)

- 4.5.55 The handling and storage of waste material will all be within the proposed waste transfer building (none outside). Waste materials will be stored in bays using moveable concrete Lego blocks as walls. The Applicant proposes to keep the internal layout of the Lego block storage bays flexible to respond to the requirements of the operations and types of waste streams.
- 4.5.56 Waste material will be tipped with the reception bay and moved to separate storage bays using a front loader/and or telehandler. There will be a baler located within the building for baling cardboard, paper, and packaging.
- 4.5.57 Once there is a sufficient quantity of material bulked up, it will be exported from site in HGV (e.g., roll-on roll-off's or articulated loads). Material will be loaded from within the building via covered 'sheep dip' type arrangement on the side of the building. The following photograph shows the typical arrangement of the gap in the concrete walls from which a front loader will load the waste into a roll-on roll-off container or articulated lorry.



Waste Types & Quantities

4.5.58 The waste transfer station will have a throughput of approximately 20,000 tonnes per annum. The proposal will involve the bulking and transfer of commercial/industrial waste and construction and demolition waste. Commercial and industrial waste will include cardboard, plastics, metal, paper and wood whilst the construction and demolition waste will include rubble, and hardcore and general municipal waste streams.

Plant, Equipment & Machinery

4.5.59 The waste transfer station will use mobile plant to load and unload waste materials for onward despatch. This will include a standard loading shovel, telehandler or material handling machinery as required. The plant/machinery will only operate inside the building.

Storage and Handling of Waste

4.5.60 Waste will be stored within concrete bays inside the building. There will be no handling or storage of waste material outside of the building. The storage of waste will be designed to comply with the Environment Agency's Fire Prevention Plan guidance at all times.

Traffic & Transportation

4.5.61 The throughput of waste material will be approximately 20,000 tonnes per annum, which broadly consistent with the throughput granted for the existing permission reference H/5005/17/CW. Details of the traffic associated with this element of the proposal is set out in section 4.6 below.

Waste Catchment Area

4.5.62 In terms of waste catchment area, it is proposed that the facility complies with condition 5 of planning permission reference H/5005/17/CW as follows:

Not less than 40% by weight of wastes accepted at the waste management site outlined in blue on drawing no. GPP/E/H/17/01 Rev 4 The Heath, Woodhurst, Huntingdon PE28 3BS Existing Site Layout Plan in any 12 month period shall be sourced from the East of England Region. The East of England means the counties of Norfolk, Suffolk, Cambridgeshire, Essex, Hertfordshire, Bedfordshire and Northamptonshire together with the unitary authorities of Peterborough, Southend on Sea, Milton Keynes and Luton. The operator shall endeavour that within 5 years of the date of this permission at least 25% by weight of wastes shall be procured from a 40 kilometre catchment area of the site and the administrative areas of Cambridgeshire

and Peterborough as shown on 'Plan CCC1 - Waste Catchment Area'. Waste from a waste transfer station within the defined catchment area shown on 'Plan CCC1 - Waste Catchment Area' shall be regarded as arising from within the catchment area.

Operating Hours

4.5.63 The waste transfer station will operate between the following hours:

- 05.00 to 22.00 hours daily including Sundays and Public/Bank Holidays

vi) Biomass Woodchip Fuel Store

Overview

4.5.64 The existing x2 biomass boilers currently dry approximately 20,000 tonnes of wood chip per annum. The proposed biomass fuel storage building (49 on the Proposed Site Layout drawing reference GPP/E/CWH/21/03 Rev11) will house wood chip that will be used in the existing biomass operations on site.

4.5.65 The biomass fuel (wood chip) is currently stored in stockpiles outside. If the feedstock woodchip gets wet during periods of inclement weather, it can decrease the amount of energy that can be produced. In these circumstances, the woodchip requires drying in the 'drying units' on site. The storage of woodchip outside can also make it more difficult to control dust in dry and windy conditions. The proposed biomass fuel storage building will therefore have a number of benefits to the operation of the existing boilers on site.

4.5.66 Reduction in the potential for fire will also result as a consequence of containment in a building, also dust reduction.

Biomass Woodchip Storage Building

4.5.67 The proposed Biomass Woodchip Storage Building will have a steel portal frame construction and will be 70 metres long and 40 metres wide. The height of the building will be 8.0 metres to the eaves and 10 metres to the ridge. The building will contain 3.0-metre-high concrete push walls to facilitate the loading of material by a front-loader.

4.5.68 The building will have 2 roller shutter doors to provide access/agrees and will be clad with box profiled steel cladding coloured dark green to assimilate into the existing complex and surrounding landscape. Elevations and a floor plan of the proposed Biomass Woodchip Storage Building are shown on drawing GPP/E/CWH/21/06 Rev3.

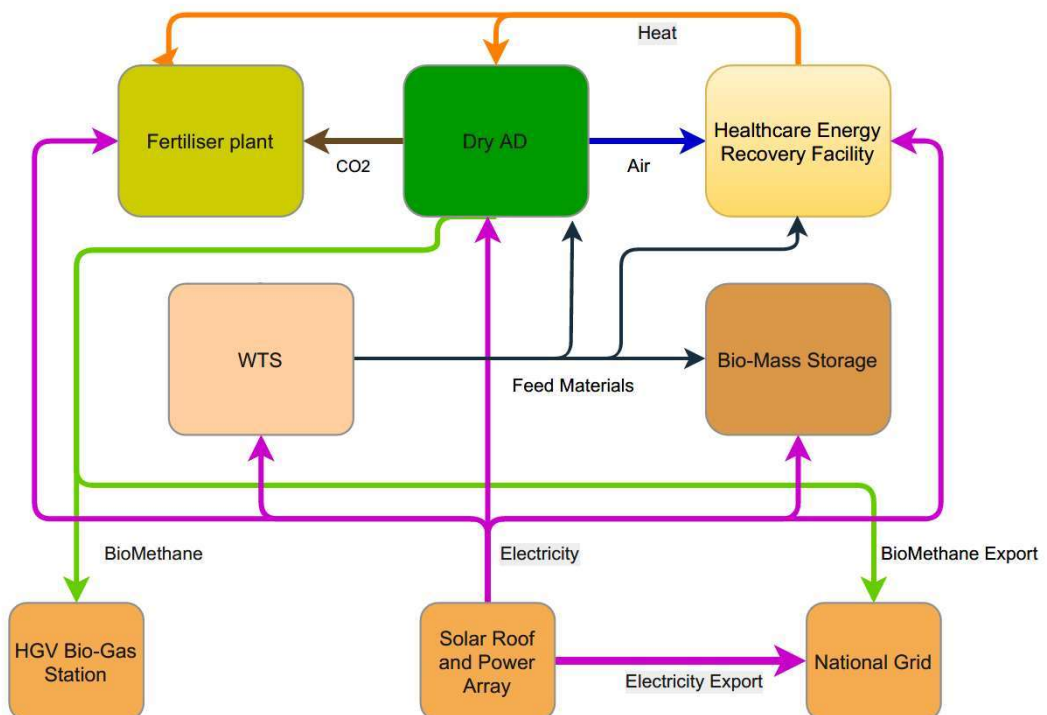
Operating Hours

4.5.69 The delivery of woodchip to the proposed replacement storage building will be between the following hours:

- 05.00 to 22.00 daily including Sundays and Public/Bank Holidays
- There will be shredding of wood waste between 07.00 to 18.00 daily including Sundays and Public/Bank Holidays

4.6 Co-Location Benefits

4.6.1 There are a number of co-location benefits between the main elements of the proposed development, in particular the Dry AD Plant, the Pellet Fertiliser Production Facility and the Healthcare Waste ERF together with the x2 Combined Heat and Power (CHP) Plants. In conjunction with the existing processes on the site, these proposed components significantly enhance the efficiency and sustainability of the entire operations. The schematic diagram below shows the sustainability benefits and inter-relationship between the main elements of the proposed development.



4.6.2 The main synergies and relationships between the various parts of the proposed development that combine to provide a sustainable waste management solution are:

1. Heat that is generated in the Healthcare Waste ERF will be used in the Dry AD Plant process and Pellet Fertiliser Production Facility providing significant on site energy efficiencies.
2. The Dry AD Plant will not only turn green/food waste into a soil conditioner and a pellet fertiliser, but it will also produce renewable biogas that can be exported to the national grid network via what mechanism and used on site by the Applicant as a fuel for road going vehicles.
3. The CHP elements will generate a significant percentage of the electrical power required by the proposed development with the heat being utilised throughout the system.
4. Roof mounted solar panels on the roofs of the main new buildings will also provide a sustainable power source for use on site.
5. The sorting of waste in the Waste Transfer Station will enable the Applicant to supply wood to the Biomass Woodchip Storage Building and organic waste matter to the Dry AD Plant.
6. Direct capture of carbon dioxide during the pellet fertiliser production process.

4.7 Traffic, Access, Vehicle Numbers & Parking

- 4.7.1 The main access into the site for Heavy Commercial Vehicles (HCV's) will be E1 located on the western flank of the site. This is the existing access used by HCV's delivering material. Access E3, also on the western flank, will be used by HCV's exporting material out of the site (as existing) and car parking for staff. Existing entrance E5 will be used by cars and motorcycles for car parking. The other existing entrances around the site (including E2 and E4) will be kept locked/gated and only used for emergency access. The access points are shown on drawing reference 'Proposed Site Layout Plan' reference GPP/E/CWH/21/03 Rev11.
- 4.7.2 The total permitted annual tonnages throughput at the site (taking into account all of the proposed components) will not increase over and above the existing restriction of 200,000 tonnes per annum imposed by the extant planning permission. There will therefore be no increase in traffic beyond the previously granted HCV movement of 120 in and 120 out (240 movements per day). The proposed development means there will only be a change in the type of waste and material being imported to the site for treatment and management rather than overall vehicle movements.
- 4.7.3 In addition to existing vehicle movements by vans, light goods vehicles (LGV's) and heavy commercial vehicles (HCV's), the proposal will lead to an increase in staffing numbers at the site, with approximately 22 new jobs being created. The total vehicular trips per working day associated with staff driving their cars into and out of the site is likely to be approximately 44 movements (22 in and 22 out).

- 4.7.4 A Traffic Management Plan (TMP) accompanies this Planning Statement at Appendix 3. The TMP seeks to ensure the movement of HCVs (including construction traffic) is effectively managed to minimise local highway network capacity impacts and to ensure that highway safety is not compromised.
- 4.7.5 The TMP proposes that all HCVs use the primary vehicle routeing via the St. Ives Bypass link to the A14 or A141 as these are the largest and main access routes to the site from the wider highway road network. Through the use of these routes HCV traffic will avoid the majority of local residential areas and potentially sensitive traffic areas before accessing main transport links.
- 4.7.6 The existing waste management site has car parking arrangement provided at the 'Heathtops' as shown on the enclosed Proposed Site Layout drawing GPP/E/CWH/21/03 Rev11 labelled as item 51.
- 4.7.7 It is proposed to create additional car parking spaces at the 'Cheffins' within the Application site on the southern boundary as shown on drawing Proposed Site Layout drawing GPP/E/CWH/21/03 Rev11 labelled as item 52. There will be approximately 80 additional car parking spaces (including 4x disabled spaces, motor bike parking and cycle racks) within this area.

4.8 Surface Water Drainage

- 4.8.1 The proposed development site overlaps with areas of the existing waste management facility which already drain to an existing water management system. It is therefore proposed to augment the existing system to manage the additional run-off from the proposed development. It is proposed to construct 4 new surface water lagoons (x3 for dirty water and x1 for clean water).
- 4.8.2 Under normal rainfall conditions water from roofs and roads will be conveyed to a new 'clean' water lagoon. 'Dirty' run-off from hardstanding areas will be conveyed to three new 'dirty' water lagoons for subsequent treatment. Treated water will be re-used on-site or discharged from the site under licence.
- 4.8.3 Water which has been collected from the waste processing areas will drain into the onsite storage lagoons where it is treated in an on-site leachate treatment plant (LTP). The LTP is designed to process water, cleaning it to a level whereby it is permitted to be discharged into local surface water systems with the roof water. The process is controlled by strict BAT standards administered by the Environment Agency.

4.9 Water Holding Tanks & Fire Risk Management

- 4.9.1 The Applicant will install a UKAS accredited fire detection and suppression system to protect both human health and the plant and equipment. Details of the fire prevention measures will be set out in the Fire Prevention Plan accompanying the Environmental Permit application to the Environment Agency.
- 4.9.2 Two fire water tanks will be located on the site (circa 4.2 metres wide and 9 metres in height), which will be used to provide a supply of fire water in the event of a fire. The location of the new water tanks and pump house are shown on drawing reference GPP/E/CWH/21/03 Rev11 Proposed Layout Plan (34). Each tank will hold approximately 100,000 litres of water. Additional fire water capacity will also be available from the proposed surface water attenuation lagoons. Four cross sections of the proposed development shown the scale and appearance of the fire water tanks within the Application Site and are shown on drawing reference GPP/E/CWH/21/08 Rev00.

4.10 Construction

- 4.10.1 Construction of the proposed development is expected to take around 12-18 months (36 months maximum).
- 4.10.2 The construction programme is anticipated to comprise the following key phases:
- Phase 1 – Construction of the Waste Transfer Station and Biomass Woodchip Storage Building
 - Phase 2 – Lagoon construction
 - Phase 3 and 4 - Dry AD construction alongside Healthcare Waste Recovery Facility
 - Phase 5– Pellet Fertilizer Building and processing equipment construction.
- 4.10.3 Construction will take place in accordance with a Traffic Management Plan (see Appendix 3 to this statement).
- 4.10.4 Construction activities would take place 07:00 – 18:00 hours Mondays to Friday and 07:00-13:00 hours on Saturdays. No external construction will take place on Sundays and Bank Holidays.

4.11 Employment & Economics

- 4.11.1 The proposal represents a significant financial investment into the future development of the existing waste management facility. The proposed development will generate a minimum of 22 full time jobs together wider indirect and induced employment. As well as direct employment, the proposed

development will create indirect and induced employment opportunities as a consequence of how the supply chains operate.

- 4.11.2 During construction, the proposed development will give rise to direct employment at full time equivalent levels of over 30 jobs annually over the two-three-year construction phase.

4.12 Security

- 4.12.1 The site entrance has a lockable gate's access, and the site will be secured with a 2 metre high perimeter steel security fence. The applicant will install a CCTV system to deter and prevent crime. The Site Manager will be responsible for ensuring that the site is safe and secure when not operating. The site already operates a night time security guard and this would continue.

5 PLANNING POLICY CONTEXT

5.1 Introduction

5.1.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that the determination of a Planning Application must be made in accordance with the Development Plan unless material considerations indicate otherwise.

5.1.2 In this instance, the Development Plan consists of the following documents:

- Cambridgeshire and Peterborough Minerals and Waste Core Strategy DPD adopted July 2011;
- Cambridgeshire and Peterborough Minerals and Waste Site Specific Proposals DPD adopted February 2012, and
- Huntingdonshire Local Plan adopted May 2019.

5.1.3 The main policies within each document considered relevant to the proposal are set out below.

5.2 The Development Plan

Cambridgeshire and Peterborough Minerals and Waste Core Strategy

5.2.1 The Minerals and Waste Core Strategy sets the framework for all minerals and waste developments until 2026. It sets out policies to guide minerals and waste management development.

5.2.2 The following main policies of the adopted Minerals and Waste Core Strategy are relevant to the determination of this Planning Application:

- CS2 – Strategic Vision and Objectives for Sustainable Waste Management Development;
- CS14 – The Scale of Waste Management Provision;
- CS15 – The Location of Future Waste Management Facilities;
- CS18 – Waste Management Proposals Outside Allocated Areas;
- CS19 – The Location of Hazardous Waste Facilities – Resource Recovery and Landfill;
- CS22 – Climate Change;
- CS24 – Design of Sustainable Minerals and Waste Management Facilities;
- CS29 – The Need for Waste Management Development and the Movement of Waste;
- CS30 – Waste Consultation Areas;
- CS32 – Traffic and Highways;

- CS33 – Protection of Landscape Character;
- CS34 – Protecting Surrounding Uses;
- CS35 – Biodiversity and Geodiversity;
- CS36 – Archaeology and the Historic Environment;
- CS39 – Water Resources and Water Pollution Prevention, and
- CS40 – Airport Safeguarding.

Cambridgeshire and Peterborough Minerals and Waste Site Specific Proposals DPD

5.2.3 The Site Specific Proposals DPD sets out site specific allocations for minerals and waste development and supporting site specific policies to support the strategic vision.

5.2.4 The following main policies of the adopted Site Specific Proposals DPD are relevant to the determination of this Planning Application:

- Policy SSP W1 – Waste Recycling and Recovery Facilities (Non-Landfill), and
- Policy SSP W8 – Waste Consultation Areas.

5.2.5 The site specific and Area of Search allocations for waste recycling and recovery facilities include:

- Policy SSP W1J – Envar, Woodhurst (in vessel and windrow composting).



5.2.6 Summary of Policy W1J – Envar, Woodhurst (The Allocation):

Site Name	Envar, Woodhurst
Description of Proposed Use	Waste Recycling and Recovery Facility. Composting windrow and In Vessel
Area	18.5 ha
Approximate Timescale	Existing site expansion dependant on demand and market conditions
District	Huntingdonshire
Parish	Somersham
Grid Ref	TL 337 755
Site Characteristics	
<ul style="list-style-type: none"> • Currently in waste management use for composting • Within airport safeguarding areas for Cambridge, Wyton and Alconbury • High grade agricultural land (Grade 2) • Close to sensitive receptors (residential on southern boundary and raptor centre on north west boundary) • Site located in area of high archaeological potential 	

Huntingdonshire Local Plan

5.2.7 The following main policies of the adopted Local Plan are relevant to the determination of this Planning Application:

- Policy LP2 – Strategy for Development;
- Policy LP5 – Flood Risk;
- Policy LP10 – The Countryside;
- Policy LP11 – Design Context;
- Policy LP12 – Design Implementation;
- Policy LP14 – Amenity;
- Policy LP15 – Surface Water;
- Policy LP16 – Sustainable Travel;
- Policy LP17 – Parking Provision and Vehicle Movement;
- Policy LP19 – Rural Economy;
- Policy LP29 – Health Impact Assessment;
- Policy LP30 – Biodiversity and Geodiversity;
- Policy LP34 – Heritage Assets and their Settings;

- Policy LP35 – Renewable and Low Carbon Energy;
- Policy LP36 – Air Quality, and
- Policy LP37 – Ground Contamination and Groundwater Pollution.

5.3 Other Relevant Documents

5.3.1 The National Planning Practice Guide (NPPG) confirms that the National Planning Policy Framework (NPPF) represents up-to-date government planning policy and must be taken into account where it is relevant to a Planning Application.

5.3.2 The following documents are therefore considered to represent a material consideration in the determination of this Planning Application:

- National Planning Policy Framework;
- National Planning Practice Guidance;
- Resources and Waste Strategy for England (2018);
- National Planning Policy for Waste (2014);
- Waste Strategy for England (2007);
- Emerging Cambridgeshire and Peterborough Minerals and Waste Local Plan;
- Cambridgeshire and Peterborough Location and Design of Waste Management Facilities SPD (2011);
- Cambridgeshire Flood and Water SPD (2018);
- Huntingdonshire Design Guide SPD (2017), and
- Huntingdonshire Landscape and Townscape Assessment SPD (2007).

Emerging Cambridgeshire and Peterborough Minerals and Waste Local Plan

5.3.3 The Council and Peterborough City Council are in the process of reviewing the joint Minerals and Waste Development Plan. The current Core Strategy Development Plan Document (DPD) was adopted in 2011 and the Site-Specific Proposals DPD was adopted in 2012. These two plans are being reviewed and a single joint Minerals and Waste Local Plan (MWLP) covering the two authority areas is being produced to replace them.

5.3.4 The Councils have consulted on a Preliminary Draft Local Plan (May 2018); a Further Draft Local Plan (March 2019) and, more recently, a Proposed Submission Local Plan (November 2019). Views were sought on a range of draft policies, and on the approach the plan should take in guiding mineral and waste management development over the period to 2036. Following these consultations, the Councils took all comments into consideration.

5.3.5 On 24th March 2020, the Councils submitted the new Cambridgeshire and Peterborough Minerals and Waste Local Plan to the government for examination by an independent planning inspector. Following the hearing sessions, the Inspector produced a report with recommended modifications to the submitted Local Plan to make the document 'sound'. The Councils are due to consider the recommended modifications in the summer 2021.

5.3.6 The following emerging policies are considered relevant to the Proposed Development:

- Policy 1 – Sustainable Development and Climate Change;
- Policy 3 – Waste Management Needs;
- Policy 4 – Providing for Waste Management;
- Policy 10 – Waste Management Areas (WMAs);
- Policy 16 – Consultation Areas;
- Policy 17 – Design;
- Policy 18 – Amenity Considerations;
- Policy 20 – Biodiversity and Geodiversity;
- Policy 21 – The Historic Environment;
- Policy 22 – Water Resources;
- Policy 23 – Traffic, Highways and Rights of Way, and
- Policy 25 – Aerodrome Safeguarding.

5.3.7 Given that the emerging Minerals and Waste Local Plan has been through independent examination, it is considered that the above listed policies can be afforded significant weight in the determination of this Planning Application.

6 ASSESSMENT OF THE PROPOSAL

6.1 Introduction

6.1.1 From an assessment of the Development Plan and other relevant documents, the main issues in the assessment of the proposed development are as follows:

- Principle of Development;
- Need for Waste Recycling;
- Local Economy;
- Catchment Areas, and
- Environmental & Amenity Considerations.

6.1.2 The following section considers the main planning issues in turn.

6.2 Principle of Development – Location

Waste Related Development

6.2.1 National and local waste related planning policy and guidance requires that waste be diverted away from disposal at landfill and is driven up the ‘waste hierarchy’. The proposed development achieves this by diverting green and food waste away from landfill towards recycling and recovery, therefore contributing to the principles of sustainable waste management.

6.2.2 The waste related elements of the proposed development (Dry AD Plant, Healthcare Energy Recovery Facility and Waste Transfer Station) will be located on, and adjacent to, an existing waste management facility which comprises green and food waste composting (open windrow/in-vessel), waste transfer station, the deposit, storage and shredding of wood waste and a biomass Combined Heat and Power (CHP) Plant which includes the recovery of heat.

6.2.3 Policy CS15 (The Location of Future Waste Management Facilities) of the Minerals and Waste Core Strategy states that *“sites to deliver a network of waste management facilities across the Plan period will be identified through the Core Strategy and Site-Specific Proposals Plan”*.

6.2.4 The existing waste management facility has been in use for a number of decades and the Council have allocated the Applicant’s site (18.5 hectares) as being a preferred location for the recycling and recovery

of waste; in-vessel and open windrow composting. The allocation set out in Minerals and Waste Site Specific Proposals Plan at Policy W1J is the Applicant's Envar (Woodhurst) site.

6.2.5 Whilst the proposed Dry AD facility and Healthcare Energy Recovery Facility are not entirely consistent with the allocation in that it directs operators towards in-vessel and/or open windrow composting, the proposed development is considered to be compliant with the aspirations of the policy in that it is for the continued recycling and recovery of waste.

6.2.6 Policy W1 (Waste Recycling and Recovery Facilities (Non-Landfill)) of the Site-Specific Proposals DPD states that:

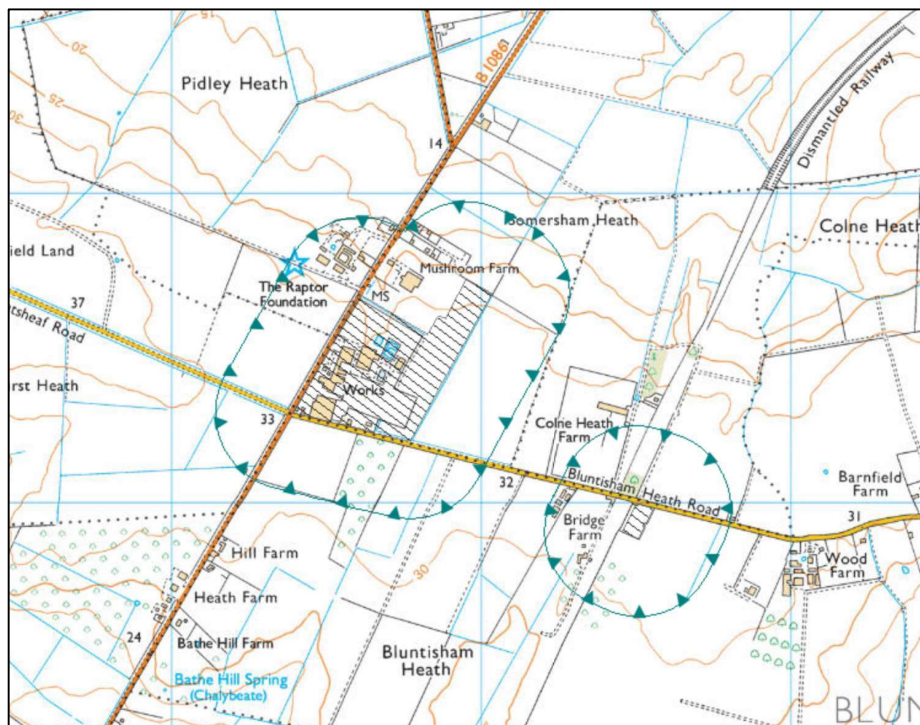
where new waste management technologies come forward these will be considered on their merits. In considering sites and the types of waste management uses that may be appropriate on them, it is often the case that a site could satisfactorily accommodate one of several types of waste management facility, and possibly multiple integrated uses that together would maximise the recovery and recycling of a particular waste stream. In such circumstances it would be difficult to justify restricting the site to one particular use.

6.2.7 The Applicant's site also benefits from a biomass CHP Plant, so the principle in planning terms of other waste management/energy recovery operations has been established on the site. The heat from the Healthcare Energy Recovery Facility will complement the requirements of the Dry AD Facility i.e. the provision of a sustainable source of heat and the ability to manage some of the more odorous air from the AD process.

6.2.8 Should it be concluded by the Council that the proposal is not strictly in accordance with the intentions of the existing allocation, then Policy CS18 (Waste Management Proposals Outside Allocated Areas) of the Minerals and Waste Core Strategy is relevant. Policy CS18 states that waste recovery and recycling facilities may be permitted where they are "*co-located with complementary activities (including existing permanent waste management sites); and/or on previously developed land*".

6.2.9 The waste related elements of the proposed development will therefore be located on an existing permanent waste management facility with complementary activities and will make use of, in part, previously developed land. Therefore, the proposed development is considered to be broadly compliant with Policy CS18 of the Minerals and Waste Core Strategy.

6.2.10 The emerging Minerals and Waste Local Plan proposes to allocate the entire Envar site boundary as a future ‘Waste Management Area’ (WMA). The proposals map extract below identifies the site and the waste consultation area.



6.2.11 Policy 10 (Waste Management Areas) of the emerging Waste Local Plan states that development will not be permitted other than:

- *“That which meets Policy 4: Providing for Waste Management; or*
- *Proposals which are compatible for that specific site as identified in the Development Plan for the area;*
- *or*
- *Proposals which demonstrate clear wider regeneration benefits which outweigh the harm of discontinued operation of the site as a Waste Management Area”.*

6.2.12 Subject to compliance with Policy 4 (Providing for Waste Management) of the emerging Waste Local Plan, the Dry AD facility which proposes to recycle green and food waste is compatible with the existing permitted land use and the Healthcare Waste Energy Recovery Facility shares similar traits to the approved biomass facility which recovers heat through the thermal treatment of material.

6.2.13 Policy 4 (Providing for Waste Management) of the emerging Waste Local Plan states that:

Across the plan area, existing and committed waste sites meet the majority of identified needs, with the capacity gap over the plan period being less than substantial. As such, the strategy

of this plan is not to make specific allocations for new waste sites. Instead, this policy sets out a broad spatial strategy for the location of new waste management development; and criteria which will direct proposals to suitable sites, consistent with the spatial strategy.

6.2.14 It is clear therefore that the Applicant's existing (and allocated) site is intended to assist the Council in meeting the identified waste management needs in the County and deal with any shortfall in capacity gaps.

6.2.15 Policy 4 continues...:

Unless otherwise supported by policy provision under one of the sub-headings in the second half of this Policy, new or extended waste management facilities should be located within the settlement boundary of the existing or planned main urban areas of: Cambourne, Cambridge, Chatteris, Ely, Huntingdon, Littleport, March, Northstowe, Peterborough, Ramsey, Soham, St. Ives, St. Neots, Waterbeach New Town, Whittlesey or Wisbech.*

6.2.16 The second half of Policy 4 deals with (inter alia) 'Waste Management Facilities - Co-location' and notes that the principle of co-locating waste management facilities and/or with complementary activities together will be supported. In compliance with this aspiration, the Applicant's proposal demonstrates a number of co-location and complementary benefits such as:

- *Heat to be provided from the Healthcare Waste Energy Recovery Facility to the Dry AD Plant to assist the AD process.*
- *Recovered power from the CHP plant being used to power the plant and equipment on site*
- *Odorous air from the AD process will be treated in the Healthcare Waste Energy Recovery Facility*
- *Biogas will be exported to the grid. The Applicant will be able to draw on the bio-methane resource by providing a fuelling station to power the Company's vehicles on a sustainable source of gas as opposed to using natural resources (such as oil or natural gas)*

6.2.17 In conclusion, the Application Site is on an existing waste management facility which is allocated in the Development Plan for waste recycling and recovery activities, and as a future 'Waste Management Area' within the emerging Waste Local Plan. The recycling of green and/or food waste including the recovery of heat from Healthcare Energy Recovery Facility will complement existing activities on-site and will in part, make use of previously developed land. There are clear co-location benefits between the existing IVC facility and the proposed Dry AD Plant together with the additional sustainable inter-relationship benefits working alongside the Healthcare Energy Recovery Facility.

6.2.18 Having regard to the above assessment, the proposal is therefore compliant with the locational policies requirements of the Minerals and Waste Core Strategy, Minerals and Waste Site Specific Proposals DPD and with the emerging Minerals and Waste Local Plan.

6.3 Need - Healthcare Waste Treatment

Introduction

6.3.1 Policy CS15 of the adopted Minerals and Waste Core Strategy deals with the 'Location of Future Waste Management Facilities' and, amongst other matters, states that the spatial distribution of the network will be guided by '*the need for waste management facilities*'. Policy CS29 of the Minerals & waste Core Strategy deals with 'The Need for Waste Management Development and the Movement of Waste' and seeks to ensure that proposals for new waste management development, or extensions to existing waste management development, demonstrate that there is a need within Cambridgeshire and Peterborough. Waste that is brought outside of the Cambridgeshire and Peterborough area will need to be the most sustainable option.

6.3.2 The proposed Dry AD Facility and Waste Transfer Station will continue to manage waste streams that are already permitted at the site. The Dry AD facility will manage the green and food waste material currently processed by the IVC facility and the proposed new Waste Transfer Building will sort, store and bulk up waste streams that are currently permitted at the site. These waste streams already form part of the of the County's existing waste management capacity identified in the MWLP. There is no policy requirement to demonstrate a need for these elements of the proposal.

Healthcare Waste Treatment

6.3.3 Paragraph 7.58 of the adopted Minerals and Waste Core Strategy is supporting text to Policy CS19 '*The Location of Hazardous Waste Facilities – Resource Recovery and Landfill*'. Here the Core Strategy

The need has been identified by Addenbrookes hospital for a new clinical waste facility (energy from waste) to replace the existing facility. Any new facility would meet modern standards and serve the existing Addenbrookes complex, the planned growth of the hospital and associated biomedical park and continue to make a contribution to the wider management of clinical waste in the region.

6.3.4 Paragraphs 7.59 to 7.61 goes to conclude that there is no requirement to make additional provision for a new specialist facility to treat hazardous waste in the Plan on the basis that the Council allocates a

strategic allocation at Addenbrooke Hospital as a replacement clinical waste facility (Energy from Waste). The strategic allocation is set out at Policy CS19 of the adopted Minerals and Waste Core Strategy.

- 6.3.5 In the latter part of Policy 4 of the emerging Minerals and Waste Local Plan it also deals with 'Waste Management Facilities - Hazardous Waste Treatment and Disposal'. It states:

Proposals for the disposal of hazardous waste will only be supported in exceptional circumstances, and where it is demonstrated that there is a clear need for such a facility to be located in the plan area. Proposals for hazardous waste treatment will be supported where there is a demonstrated need and will be considered in the context of the Development Plan.

- 6.3.6 The strategic allocation in Policy CS19 for a replacement energy from waste clinical waste facility at Addenbrooke's Hospital received planning permission in July 2013 (ref. no. C/05009/12/CW). The annual throughput of that facility was not proposed to exceed 2,555 tonnes of which 70% would be from within the Addenbrooke's campus itself, leaving capacity for only 766.5 tonnes per annum from other sources. Although the planning permission has been implemented (and so remains extant) the facility has not been built. There is, therefore, no healthcare/clinical waste treatment facility within the Plan area to deal with Cambridgeshire and Peterborough's healthcare waste arisings and it would be reasonable to conclude that there is a need for the Applicant's proposed Healthcare Energy Recovery facility in the Plan area.
- 6.3.7 Notwithstanding the above conclusion, the Applicant has commissioned (Eunomia Research and Consulting) an independent initial assessment report of healthcare/clinical waste arising and treatment facilities in the Peterborough and Cambridgeshire area including the wider catchment of the East of England. The 'Eunomia' Need Assessment Report is enclosed at Appendix 2 to this report.
- 6.3.8 Cambridgeshire County Council granted planning permission for a sanitary/clinical waste bulking up facility in Ely under planning permission (reference CCC/20/028/FU dated 25th June 2020). The Applicant in this regard is Citron Hygiene Ltd, a company that specialises in collecting sanitary and clinical waste from facilities such as hospitals, doctors, dentists etc. That facility is permitted to collect up to 5000 tonnes per annum of non-recyclable waste streams which are required to be either managed either by landfill or thermal treatment. Given the proximity of the Ely bulking up facility and the Applicant's proposal, there is a reasonably good prospect that collected healthcare waste streams could be treated at the site instead of being taken outside of the Plan area for treatment.
- 6.3.9 The Eunomia Report acknowledges the Ely sanitary/clinical waste bulking up facility and also notes that under the COVID-19 pandemic, the generation of clinical waste is likely to have increase demand for the

treatment of a difficult waste stream, especially through the increase in personal protective equipment (PPE) worn by healthcare workers, COVID test kits and associated material.

- 6.3.10 Setting aside the likely increase in waste from the COVID pandemic, the report goes on to conclude that there are approximately 33-39,000 tonnes per annum of healthcare waste arisings in the East of England (including Cambridgeshire and Peterborough) area that will require management and treatment. Approximately 3000 tonnes per annum is exported from the Cambridgeshire and Peterborough area for treatment elsewhere.
- 6.3.11 In overall terms, given that the strategic allocation in Policy CS19 for a replacement energy from waste clinical waste facility at Addenbrooke's Hospital has not been built (and that is needed to meet capacity) together with the evidence in the Eunomia Report that there is requirement for a more local facility to deal with healthcare waste arisings in the Cambridgeshire and Peterborough area, it is reasonable to conclude that there 'is a clear need' for a healthcare waste treatment facility in the Plan area in accordance with Policy 4 of the emerging Minerals and Waste Local Plan and Policy CS29 of the Minerals & Waste Core Strategy.

6.4 The Waste Hierarchy

- 6.4.1 The National Planning Policy for Waste (England) sets out the Government's ambition to work towards a more sustainable and efficient approach to resource use and management. Positive planning plays a pivotal role in delivering this country's waste ambitions through:

delivery of sustainable development and resource efficiency, including provision of modern infrastructure, local employment opportunities and wider climate change benefits, by driving waste management up the waste hierarchy...

- 6.4.2 Policy 4 (Providing for Waste Management) of the emerging Waste Local Plan states that:

Waste management proposals must demonstrably contribute towards sustainable waste management by moving waste up the waste hierarchy.

- 6.4.3 It is widely accepted that healthcare waste and similar related waste streams cannot be recycled because they need to be managed in a way that it does not pose a public health risk. The most common form of management for these types of waste streams is either disposal/landfill or thermal treatment. There is therefore inevitably a proportion of this waste that cannot be moved up the 'waste hierarchy and will be considered 'disposal' in this regard.

- 6.4.4 The proposal will, however, ensure that surplus heat is recovered from the Healthcare Waste Energy Recovery Facility to the Dry AD Plant to assist the AD process. Recovered power from the CHP plant will be used to power the plant and equipment on site and odorous air from the AD process will be treated in the Healthcare Waste Energy Recovery Facility. In addition, biogas will be exported to the grid as a renewable fuel. The Applicant will also be able to draw on the bio-methane resource by providing a fuelling station to power the Company's vehicles on a sustainable source of gas as opposed to using natural resources (such as oil or natural gas).
- 6.4.5 The proposed development will comply with the aspirations of the Waste Hierarchy by diverting green and food waste from landfill and transforming it into a valuable agricultural fertiliser. The proposed pellet fertiliser plant will provide further sustainable benefits. The carbon savings that result from the direct capture of CO₂ during the production process will have significant sustainability benefits as well as providing an environmentally friendly pellet fertiliser.
- 6.4.6 In overall terms, the Applicant's proposal is a sustainable form of waste management development and complies with the Government's policy aspirations of moving waste up the hierarchy.

6.5 Waste Catchment Areas

- 6.5.1 Policy CS29 of the Minerals & Waste Core Strategy deals with 'The Need for Waste Management Development and the Movement of Waste'. Waste that is brought outside of the Cambridgeshire and Peterborough area will need to be the most sustainable option.
- 6.5.2 It is proposed that the majority of healthcare waste for the proposed Energy Recovery Facility is sourced from within Cambridgeshire and Peterborough, although some of the waste materials may be sourced from within a regional context (East of England) due to the specialist nature of the waste arisings.
- 6.5.3 The organic (green and food waste) material that will be imported to the Dry AD facility and the on-going waste transfer station operations at the site will continue to comply with the site wide requirements of condition 5 of planning permission reference H/5005/17/CW as follows:

Not less than 40% by weight of wastes accepted at the waste management site outlined in blue on drawing no. GPP/E/H/17/01 Rev 4 The Heath, Woodhurst, Huntingdon PE28 3BS Existing Site Layout Plan in any 12 month period shall be sourced from the East of England Region. The East of England means the counties of Norfolk, Suffolk, Cambridgeshire, Essex, Hertfordshire, Bedfordshire and Northamptonshire together with the unitary authorities of

Peterborough, Southend on Sea, Milton Keynes and Luton. The operator shall endeavour that within 5 years of the date of this permission at least 25% by weight of wastes shall be procured from a 40 kilometre catchment area of the site and the administrative areas of Cambridgeshire and Peterborough as shown on 'Plan CCC1 - Waste Catchment Area'. Waste from a waste transfer station within the defined catchment area shown on 'Plan CCC1 - Waste Catchment Area' shall be regarded as arising from within the catchment area.

- 6.5.4 On the basis of the above, it is considered that the catchment area for sourcing the various waste streams in connection with the proposed development will comply with the principles of setting catchment areas to comply with the principles of proximity and self-sufficiency having regard to the geographical circumstances and the need for specialised installations for certain waste types. The proposed development therefore complies with Policy CS29 of the Minerals & Waste Core Strategy.

6.6 Statement of Sustainable Design & Construction

- 6.6.1 This section responds to the requirements of MWCS Policy CS24, HLP Policies LP11 and LP12 and emerging MWLP Policy 17 which require a high standard of sustain design and construction. HLP Policies LP11 and LP12 are supported by the HPL Design Guide SPD (2017). The MWSPD and Appendix 3 (The Location and Design of Waste Management Facilities) of the emerging MWLP develop these requirements in more detail and recommend that in rural locations design should reflect the scale and design of agricultural buildings.
- 6.6.2 In terms of location, Appendix 3 of the shortly to be adopted MWLP provides advice in relation to sites in rural locations. The siting of the proposed development within the Applicant's land holding has had due regard to the policy context and guidance by providing a design which minimises views to operational areas, particularly building and plant/equipment, and any other elements that present a more 'industrial' appearance. The proposed design seeks to be sympathetic to landscape character and distinctiveness and provide easy access to main road networks suitable for HCVs. The proposed landscaping planting seeks to enrich the existing boundary treatment and enhance biodiversity as far as possible within a working waste management facility.
- 6.6.3 The proposal is also compliant with the guidance by the co-location of waste management facilities, which as the guidance notes

can offer significant benefits in reducing the need for transport of waste and the treated product in operational terms and is encouraged. There are synergies in different collection and

treatment methods, and bringing more than one facility together can maximise the amount of resource recovery that can take place and provide a more sustainable waste management solution.

6.6.4 The proposed scheme has had regard to the principal requirements of sustainable design and construction by:

- Diverting green and food waste from landfill minimising the release of greenhouse gas emissions from decomposing waste and slowing down climate change;
- Heat that is generated in the Healthcare Waste ERF will be used in the Dry AD Plant process and Pellet Fertiliser Production Facility providing significant on site energy efficiencies.
- Providing an innovative Pellet Fertiliser Facility that captures significant quantities of carbon from the anaerobically digested material to produce a high quality environmentally friendly fertiliser;
- Incorporating solar panels to the roofs of the main buildings;
- Harvesting rainwater from all roofs and clean surface water areas and storage within the proposed surface water within on site lagoons;
- Generation of renewable energy in the form of biogas from the anaerobic digestion process – the biogas can be exported to the national to replace the natural gas (fossil fuel) and can also be used on site by the Applicant as a fuel for road going vehicles;
- The CHP elements will generate a significant percentage of the electrical power required by the proposed development with the heat being utilised throughout the system.

6.6.5 The sustainability and design credentials of the proposal are considered to comply with the planning policy requirements of the MWCS, HLP and the supporting SPD and guidance notes.

6.7 Environmental & Amenity Considerations

6.7.1 This section considers the environmental impacts associated with the proposed development. The following topics, that have the potential to cause significant environmental impacts, are covered briefly in this Planning Statement and documented in full in the ES and the accompanying Technical Appendices. These topics are considered by the Council's formal Scoping Opinion are those which should be the subject of the Environmental Impact Assessment work.

- Air quality (including odour, dust and human health)
- Noise Assessment, and
- Landscape and visual impact.

6.7.2 Other environmental issues which are not considered likely to give rise to significant effects are considered in this Planning Statement (and not in the Environmental Statement). These are:

- Traffic and Transport
- Flood Risk, Surface Water and Drainage
- Ecology
- Heritage
- Lighting

Air Quality (including dust, odour and human health)

6.7.3 Policy CS34 (Protecting Surrounding Uses) of the Minerals and Waste Core Strategy states that:

“Waste management development will only be permitted where it can be demonstrated that there would be no significant harm to the environment, human health or safety, existing or proposed neighbouring land uses, visual intrusion or loss to residential or other amenities. Mitigation measures will be required, including where appropriate a buffer zone, between the proposed development and neighbouring existing or proposed sensitive land uses.”

6.7.4 Policy LP14 of the Huntingdon Local Plan and emerging Policy 18 of the Minerals and Waste Core Strategy also seek to protect residential and ‘other amenity’.

6.7.5 An Air Quality Assessment (AQA) incorporating detailed atmospheric dispersion modelling has been undertaken by Environmental Visage Ltd for emissions to atmosphere from the proposed development. The detailed technical AQA report is enclosed at Appendix 4 to the Environmental Statement.

6.7.6 The AQA has been undertaken to assess the likely impacts from the proposed discharges to atmosphere which include:

- A single point source release from the Healthcare Energy Recovery Facility (HERF);
- Emissions from the biofilter servicing the dry Anaerobic Digestion (AD) plant;
- A single point source release from the Biogas Up-Grade facility (BUG);
- A single point source release from the Fertiliser Pellet Production Plant abatement technologies (fertiliser plant);
- Two exhaust stacks, discharging through a common wind shield, each serving one of the two proposed Combined Heat and Power (CHP) units, and
- Emissions from the two existing biomass boilers.

- 6.7.7 Each of the plant incorporated into the assessment is assumed to operate continually throughout the year. The proposed development will also include a small gas-fired boiler which has not been included in the modelling exercise as it will only discharge on the few occasions that the HERF is not available to provide heat to the Dry AD plant and will not therefore need to operate at the same time as the HERF.
- 6.7.8 Additionally, two emergency flares will be incorporated into the site operations, one to service the BUG, which has a 98 % operational time, suggesting potential flaring for up to 2 % of the year, and the other to provide an emergency flare for the grid entry point, with an estimated maximum operation of 1.5 % of the year. Neither of the flares have been modelled as they may release during managed maintenance periods or emergency conditions only and, as required, processes will be shut-down as quickly as possible to minimise any flaring which may otherwise need to continue for a prolonged period.
- 6.7.9 The AQA gives consideration to the impact of emissions to atmosphere from the development proposals, providing information on contributions of pollutants to local air quality, deposition and odour levels. It also forms the basis of a separate human health impact assessment, specifically considering the impact of potential emissions of Dioxins, Furans, and Dioxin-like PCBs.
- 6.7.10 The AQA report concludes that the effects of traffic movements are screened as having an insignificant effect.
- 6.7.11 With regard to Process Contributions, the results of the modelling show that, although the maximum process contributions of Nitrogen Dioxide cannot readily be screened as insignificant, the major source of ground level concentrations of NO₂ were the two existing biomass boilers and the point of maximum impact occurs well within the site boundary, dispersing rapidly from that point. Process contributions and the predicted environmental concentrations of NO₂ at all sensitive receptors were screened as insignificant.
- 6.7.12 Contributions of other pollutant species were also screened as insignificant, when considering normal, short-term or other than normal operating conditions.
- 6.7.13 Contributions to ecological Critical Levels and Critical Loads were also screened as insignificant.
- 6.7.14 Further modelling predicted that 8 out of 10 of the most local sensitive receptors would not experience odour concentrations above the assessment level of 3 OUE m⁻³ expressed as the 98th percentile of the hourly average, and the overall impact at all receptors was considered to be of slight significance at most.

- 6.7.15 In overall terms, there will be a net reduction in odour impacts when compared to the existing IVC facility. Even the highest modelled concentrations occur for very short periods with the worst-case exceedances over the five years' worth of meteorological data modelled resulting in the odour concentrations at the boundary exceeding 3 OUE m⁻³ for less than 7 % of the year, and with concentrations continuing to disperse quickly from the site boundary.
- 6.7.16 The results from the health impact assessment (see Appendix 5 to the Environmental Statement) confirm that there is no significant health risk associated with potential exposure to emissions of Dioxins and Furans, PCBs or PAH from the proposed HERF. The risk to health due to exposure to Dioxins is likely to be low, remaining within 1 % of the Tolerable Daily Intake (TDI) of 2 µg kg⁻¹ for adults. The inclusion of Dioxin-like PCBs into the assessment resulted in a marginal increase in the resulting Process Contributions, but which remained a very small proportion of the 2 µg kg⁻¹ TDI.
- 6.7.17 The risk to health associated with exposure to emissions of PAH demonstrated that process contributions at the sensitive receptors equate to between 0.3 and 2.7 % of the Air Quality Standard (0.25 ng m⁻³ PAH as B[a]P).
- 6.7.18 The overall conclusion from the detailed modelling of emissions from the proposal is that the potential impact on local air quality is likely to be small and unlikely to result in a significant threat to the health of people living and working nearby in compliance with Policy CS34 of the Minerals and Waste Core Strategy, Policy LP14 of the Huntingdon Local Plan and emerging Policy 18 of the Minerals and Waste Core Strategy.

Noise

- 6.7.19 Paragraphs 170 and 180 of the NPPF, Policy CS34 of the Minerals and Waste Core Strategy, Policy LP14 of the Huntingdon Local Plan and emerging Policy 18 of the Minerals and Waste Core Strategy require waste management proposals to demonstrate that there will be no significant harm to the environment or local amenity.
- 6.7.20 A Noise Assessment is enclosed at Appendix 6 to the accompanying Environmental Statement. The Noise Assessment has regard to the background noise assessment work most recently prepared in 2017 to accompany a planning application for a biomass boiler, which considered noise from the existing operations and those proposed with the boiler in operation.
- 6.7.21 The enclosed report presents an assessment of the noise levels attributable to the operation of the proposal and makes recommendations for measures to be considered during the detailed design of the

proposed facility to ensure that the cumulative operation of the site does not result in adverse noise impacts at surrounding sensitive receptors.

6.7.22 There are no residential properties in close proximity to the Application site, with the closest dwellings being:

- Heathfields, located adjacent to the B1040, approximately 530 metres from the southern site boundary, with the property located adjacent to commercial premises and set down below the ground level at the site;
- Rectory Farm Cottages and the travellers caravan site located to the north of the site, adjacent to the B1030, approximately 230 metres from the closest proposed building. The ground level at the properties are approximately 10 metres below the ground level at the site, with the buildings effectively screened; and
- Bridge Farm adjacent to Bluntisham Heath Road, approximately 750 metres from the eastern site boundary.

6.7.23 Baseline noise monitoring exercises were carried out during 2016 and 2017 to establish the prevailing background noise levels used within the noise assessment which accompanied the planning application for the proposed biomass boiler. Background noise levels within the surrounding area are noted to be low during the night-time period.

6.7.24 The Noise Assessment report has presented an initial BS 4142 assessment, made on the basis of a likely worst case operating scenario. For the purposes of the initial assessment, it is assumed that the various plant elements would be fully operational during each assessment period (see below), with no additional mitigation measures provided. The relevant assessment periods being:

Early Morning (05:00 – 07:00)	Daytime (07:00 – 18:00)	Evening (18:00 – 22:00)	Night-time (22:00 – 05:00)
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6.7.25 Noise levels attributable to the operation of the site have been calculated utilising a sound modelling package, which implements an approved calculation methodology. Calculations have been made for the main operational periods throughout the day, i.e. the early morning / evening periods, daytime and overnight, on the basis of the plant which would be operational during each period shown above.

6.7.26 The assessment concludes that the operations during the early morning, daytime and evening period would result in noise levels equivalent to the present operations and would not result in adverse noise impacts during these periods.

- 6.7.27 Overnight, the initial assessment indicates that the operation of the Dry AD and Healthcare Waste energy recovery plant has the potential to result in adverse impacts at surrounding properties. It is therefore proposed to incorporate additional mitigation measures into the final design of the proposed facility to ensure noise levels are reduced to a satisfactory standard to minimise the potential for adverse impacts. Calculations made in the Noise Assessment on the basis of likely mitigation measures, demonstrate that it is possible to reduce noise levels to a satisfactory level.
- 6.7.28 It is therefore proposed that the noise attenuation measures for the plant are developed during the detailed design stage. It is suggested that, on the basis planning permission is granted, a planning condition is imposed requiring further noise assessment to be undertaken to demonstrate that the operation of the new plant would not result in adverse noise impacts.
- 6.7.29 It is therefore concluded that the proposal is capable of being controlled to acceptable noise levels in compliance with paragraphs 170 and 180 of the NPPF, Policy CS34 of the Minerals and Waste Core Strategy, Policy LP14 of the Huntingdon Local Plan and emerging Policy 18 of the Minerals and Waste Core Strategy

Landscape & Visual Impact

- 6.7.30 Policy CS24 and emerging Policy 17 of the Minerals and Waste Core Strategy require all proposals for waste management development to achieve a high standard in their design and mitigation of environmental impacts including climate change and be consistent with the guidance provided in the MWSPD. Policy CS33 and emerging Policy 17 of the Minerals and Waste Core Strategy require waste management development to be assimilated into its surroundings and local landscape character area. MWCS policy CS34 also seeks to minimise visual intrusion. The Huntingdon Local Plan policies LP2 and LP10 requires development to recognise the intrinsic character and beauty of the countryside.
- 6.7.31 A Landscape and Visual Impact Assessment (LVIA) report has been prepared with a view to understanding how the proposed changes to the development are visually placed within the landscape and enable recommendations on how the proposed development should be implemented and integrated into the landscape. A LVIA has been carried out in line with the Landscape Institutes 'Guidelines for Landscape and Visual Impact Assessment (GLVIA3)' document. The detailed technical LVIA report is enclosed at Appendix 7 to the Environmental Statement.

- 6.7.32 The site sits within an existing small developed industrialised area with a number of other buildings / sheds within a wider area. The existing small industrialised area already hosts buildings, large sheds, moving machinery and fencing that that are characteristic of the proposed development.
- 6.7.33 The assessment of potential landscape impacts is primarily focused upon the proposed development, placed within its landscape context. The predicted residual magnitude of landscape impacts of the proposed development is localised in scale and restricted to the site, immediate environs and a further 2km, mainly due to the undulating nature and topography of the surrounding area and the presence of the Envar Composting site adjacent to the development site.
- 6.7.34 The localised nature of the landscape impacts mean that the proposed development would result in low adverse impacts on the wider landscape at a regional level. Landscape mitigation if provided would enhance the scenic quality of the area providing age structure, colour and texture to a site. It is therefore concluded that the overall magnitude of the landscape impacts would be **low**.
- 6.7.35 The assessment of potential visual impacts is, primarily, focused upon the proposed development, placed within its visual context. In terms of visual impacts, this proposal likely to swing to the 'Moderate Level' of Significance. It would be considered Major if the development was highly visible on its own, but due to the existing buildings on the Envar Composting site, and the immediately surrounding local buildings means the area has already been subject to significant development / urbanisation / humanisation in close proximity of the site boundary. The proposed development site will be seen as an extension of the existing vernacular / a consolidation of built development that is already breaking the skyline, and blocky in nature.
- 6.7.36 When considered in an increasingly broad context of the landscape, the proposed development is anticipated to be assimilated into the existing landscape and views. The existing area is considered to have the capacity to absorb the introduced characteristic elements without overarching change to the landscape character of the area and the loss of moderate to low sensitivity and uncharacteristic elements is considered acceptable. Where the visual impacts of the proposed development have been assessed to be the highest the impacts are considered to be sufficiently localised and contained that the impacts are acceptable. Where the majority of views of the proposed development are possible, they are generally seen against a backdrop of similar elements, therefore the introduction of the proposed development into these views will not appear as uncharacteristic to the existing views.

6.7.37 It is therefore concluded that no unacceptable landscape and visual impacts will arise, and the proposal is therefore compliant with Policies CS24, CS33, CS34 and emerging Policy 17 of the Minerals and Waste Core Strategy Policy and policies LP2 and LP10 of the Huntingdon Local Plan.

Traffic & Transport

6.7.38 Policy CS32 of the Minerals and Waste Core Strategy states that waste development will only be permitted where access and the highway network serving the site are suitable or could be made suitable and able to accommodate any increase in traffic and/or the nature of the traffic associated with the proposal.

6.7.39 Policy LP16 of the Huntingdon Local Plan requires transport impacts of development to be assessed and Policy LP17 requires adequate provision to be made for vehicle manoeuvring and parking and access. Emerging MWLP policy 23 deals with highway safety and capacity, the environmental impacts of traffic and promotes use of the Heavy Commercial Vehicle (HCV) Route Network.

6.7.40 A Transport Statement (TS) accompanies this Planning Statement and is enclosed at Appendix 3. The TS notes that a robust Transport Assessment accompanied a previous 2017 planning application submission and established that the proposal then to increase waste throughput from 100,000tpa up to 200,000 tonnes per annum had only a very minor traffic impact on local roads and at the site access and egress. It was on that basis that the Waste Planning Authority imposed a planning condition restricting throughput of the Applicant's land holding (the entire site) to 200,000 tonnes per annum. It is important to note that the current proposal does not seek to increase throughput of material/waste beyond the existing controls of 200,000 tonnes per annum. There will therefore be no increase in traffic beyond the previously granted HCV movement of 120 in and 120 out (240 movements per day).

6.7.41 The TS therefore sets out the site's existing vehicle movements based on the current planning permission controls and compares them to the proposed traffic movements. The TS confirms that the proposal only alters the type of, and amounts of, the various waste streams within the 200,000 tonnes per annum limit that are imported and managed at the site.

6.7.42 The TS confirms that there is no history of personal injury accidents occurring at any of the vehicular accesses into the site within the past five-year study period.

6.7.43 In granting the 2017 planning permission (reference H/5005/17/CW) the Waste Planning Authority (in consultation with the Highway Authority) accepted that the level of HCV movements would cause no detriment to highway capacity or safety. The proposal will generate traffic which is comparable to the existing permitted levels. It is therefore concluded that the proposal will not lead to a negative impact on

the capacity or safety of the local road network in compliance with Paragraph 109 of the NPPF, which states that:

‘Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe’.

- 6.7.44 It is proposed to create additional car parking spaces sufficient for the additional employees and visitors at the ‘Heathtops’ within the Application site as shown on drawing Proposed Site Layout drawing GPP/E/CWH/21/03 Rev11. There will be parking for around 80 cars (including 4x disabled spaces, motor bike parking and cycle racks) for employees and visitors of the site.

Traffic Management Plan

- 6.7.45 A Traffic Management Plan (TMP) accompanies this Planning Statement and is enclosed at Appendix 3. The TMP seeks to ensure the movement of HCVs (including construction traffic) is effectively managed to minimise local highway network capacity impacts and to ensure that highway safety is not compromised.
- 6.7.46 The TMP proposes that all HCVs use the primary vehicle routeing via the St. Ives Bypass link to the A14 or A141 as these are the largest and main access routes to the site from the wider highway road network. Through the use of these routes HCV traffic will avoid the majority of local residential areas and potentially sensitive traffic areas before accessing main transport links.

Conclusions

- 6.7.47 In overall terms, the traffic and transportation impacts of the proposal do not conflict with Paragraph 109 of the NPPF, Policy CS32 of the Minerals and Waste Core Strategy Policy LP16 and Policy LP17 of the Huntingdon Local Plan or the emerging Minerals and Waste Core Strategy Policy 23.

Flood Risk, Surface Water & Drainage

- 6.7.48 Policy CS39 (Water Resources and Water Pollution Prevention) of the Minerals and Waste Core Strategy states that “waste management development will only be permitted where it is demonstrated that there would be no significant adverse impact or risk to: *“the quantity or quality of surface or ground water resources...”*. Policy LP5 (Flood Risk) of the Huntingdon Local Plan and Policy LP15 (Surface Water) has similar policy requirements and seeks to ensure that the management of surface water is provided in a sustainable manner.

6.7.49 The NPPF confirms that 'A site-specific flood risk assessment is required for proposals of 1 hectare or greater in Flood Zone 1. The application site is situated within Flood Zone 1 of the Environment Agency's Flood Zone Maps and is 8.46 hectares in size. A Flood Risk Assessment (FRA) therefore accompanies the submission of the Planning Application and is enclosed at Appendix 4 to this statement.

6.7.50 This FRA has been undertaken with due regard to the statutory requirements of the NPPF and with reference to the Planning Practice Guidance (PPG) in relation to development and flood risk. This ensures that flood risk is taken into account at all stages of the planning process and to avoid inappropriate development in areas potentially at risk of flooding.

6.7.51 The National Planning Guidance Note provides guidance on development and flood and states (Paragraph: 031 Reference ID: 7-031-20140306) that:

A flood risk assessment should also be appropriate to the scale, nature and location of the development. For example, where the development is an extension to an existing house (for which planning permission is required) which would not significantly increase the number of people present in an area at risk of flooding, the local planning authority would generally need a less detailed assessment to be able to reach an informed decision on the planning application.

6.7.52 The existing waste facility to the south contains buildings, hardstanding areas, compost pad and four water management lagoons. With the exception of one lagoon all existing lagoons will be built over as part of the proposed development of the site and therefore require replacement and upgrade. Both existing and proposed sites are relatively flat with a gentle south to north gradient. Natural ground comprises clayey soils with underlying superficial deposits of clay, sand, gravel, and boulders overlying a mudstone bedrock. Infiltration rates are therefore likely to be variable and will depend on the extent of clay. The surrounding land use is predominantly agricultural with a mushroom farm immediately to the north and a public road along the western boundary of the site.

6.7.53 The site is located entirely within Flood Zone 1. In the absence of any significant surface run-off pathways leading into the site, surface water flood risk from external areas is assessed as being very low. Due to the mudstone bedrock and clayey nature of superficial deposits and soils, the risk of groundwater flooding is considered to be 'low'. Flooding potential from sewers and water mains is considered to be 'very low' and reservoir flood risk is 'absent'.

- 6.7.54 Ground conditions are likely to be unfavourable to surface water management by infiltration devices and it is therefore necessary to manage flood risk through means of surface storage.
- 6.7.55 The Application Site overlaps with areas of the existing waste management facility which already drain to an existing water management system. It is proposed to augment the existing system to manage the additional run-off from the proposed development.
- 6.7.56 Under normal rainfall conditions water from roofs and roads will be conveyed to a new 'clean' water lagoon. 'Dirty' run-off from hardstanding areas will be conveyed to three new 'dirty' water lagoons for subsequent treatment. Treated water will be re-used on-site or discharged from the site under licence.
- 6.7.57 Estimates of clean and dirty water storage requirements are 5,710 m³ and 14,410 m³, respectively. Site water demand exceeds or is similar to the site run-off volume during average rainfall conditions and therefore lagoons can be expected to be empty ahead of storm rainfall events. The full depth of lagoons is assumed to be available for storm water management. All lagoons are assumed to have a depth of 2 metres. This creates surface area requirements of 2,900 m² in each of the clean and dirty water lagoons.
- 6.7.58 The new clean water lagoon will be fitted with a pipe outlet to control licensed discharges. The clean water lagoon will also require an emergency overflow crest to direct water into the ditch at the northwest corner of the site during events in excess of the design storm event. In the unlikely event of such overflow, the flooding potential to properties along the B1086 road immediately downstream and to the north of the site is unlikely of sufficient depth to exceed property thresholds.
- 6.7.59 A more detailed design of the surface water management system can be secured by the imposition of a planning condition on the basis this Planning Application is successful. This could reduce lagoon storage requirements by assuming the lagoons are limited to managing on-site flood risk. Whilst the storage created in kerbed hardstanding areas between buildings provides additional storage to manage off-site flood risk.
- 6.7.60 The proposed drainage strategy of water containment and re-use complies with national, regional and local planning policies relating to land use planning and flood risk. The design criteria for the proposed drainage system also conforms with Cambridgeshire County Council's Surface Water Drainage Guidance for Developers (Nov 2019).
- 6.7.61 Having regard to the above assessment, it is therefore concluded that the proposal satisfies the flood risk requirements of the NPPF, associated technical guidance, Policy CS39 (Water Resources and Water Pollution Prevention) of the Minerals and Waste Core Strategy, Policy LP5 (Flood Risk) and LP15 of the
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Huntingdon Local Plan by managing surface water in a sustainable manner and by not being at risk of flooding and not leading to an increase in flood risk to external areas.

Ecology

- 6.7.62 Policy CS35 of the Minerals and Waste Core Strategy, Policy LP30 of the Huntingdon Local Plan and Policy 20 of the emerging Minerals and Waste Local Plan seek to protect biodiversity and geodiversity interests. The NPPF at Chapter 15 (Conserving and Enhancing the Natural Environment) echoes the above policy requirements by seeking to minimise impacts on the natural environment and provide 'net gains' for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures.
- 6.7.63 A Phase 1 Ecological Appraisal report is enclosed at Appendix 5 to this report. A separate Ecological Appraisal is also enclosed at Appendix 5 which considers the presence of protected species/bats within the building which will be demolished as part of the proposed development. The potential impact on protected species/bats is considered in paragraph 6.7.65 below.
- 6.7.64 Some of the Application Site is dominated by land that is in operational waste management use. Other areas have limited ecological value with minimal potential for the presence of protected and notable species. A summary of the findings is set out below.

Notable Species

- 6.7.65 **Bats:** The existing IVC buildings, lean-to and tunnels will be demolished to enable the construction of the Dry AD Facility. To ensure no adverse impacts upon notable and/or protected species within the buildings/structures, the Applicant has employed an ecologist to produce a separate Ecological Appraisal report of the buildings/structures to be removed. The Ecological Appraisal can be found at Appendix 5 to this Planning Statement.
- 6.7.66 The findings of the report note that the buildings within the survey area are generally assessed as unsuitable to support roosting bats and no evidence of bats was found during the building inspection. However, the supporting wall between points S1A and S1B was noted to have some areas of damage where crevices and small voids had appeared (TN1 of the report). It was possible during the inspection to inspect these areas using a torch and ladder and no evidence of bats was found, with cobwebs present suggesting no recent use of the area by bats. There is a low risk that bats may utilise these areas as roosting habitat.

- 6.7.67 It is recommended that lighting of the wider site is kept to a minimum to maintain its suitability for bat foraging/commuting habitat, particularly on areas such as the lagoons and hedgerows/tree lines. Lighting types to be avoided include any blue-white light sources, metal halide and mercury lamps, and any form of up-lighting, which lights above the horizontal plane, illuminating trees, buildings and foraging habitat.
- 6.7.68 To compensate for the demolition of the buildings, it is recommended that one Schwegler 2F bat box is installed.
- 6.7.69 **Reptiles and amphibians:** Although the site theoretically as habitat suitable for herptiles, it is unlikely to be colonized by reptiles and amphibians due to the poor water quality, constant traffic movements and associated disturbance, large areas of bare ground and the relative inaccessibility of the site. The adjacent habitats primarily composed of arable fields are unattractive habitats to most species. There are no records of protected species amphibians and reptiles within the locality.
- 6.7.70 **Mammals:** Foraging bats are potential visitors to the site. The habitat of greatest value to bats will remain unchanged. There are no trees within the development area large enough to support roosting bats, although all trees with bat boxes will be retained. Badgers are not known to visit the area. The presence of other protected mammals is considered unlikely.
- 6.7.71 **Birds:** Few species of bird were evident in the locality. The most important habitats for birds: the hedgerows and adjacent trees will be retained unchanged or be enhanced. All trees with bird boxes will be retained.
- 6.7.72 **Flora:** The ground flora is not considered to be locally or nationally important and this will remain unchanged around the perimeter of the site. The flora within the development area is generally species poor.
- 6.7.73 During the construction phase there will be a temporary impact on adjacent habitats due to increased noise, dust and disturbance as the development is assembled. Once the development is constructed there will be no additional impact on the surrounding habitats. The adjacent fields and hedgerows etc. will not be impacted following the development phase.
- 6.7.74 There will be minimal effect on the local wildlife sites the closest being located over 1km away from the site. There are limited habitats suitable for wildlife within the proposed development boundary.

Ecological & Landscape Enhancement Scheme

- 6.7.75 In order to comply with the NPPF paragraph 175, HLP policy LP30, and emerging MWLP policy 20, an assessment of measurable biodiversity net gain is required to be submitted using an appropriate Biodiversity Impact Assessment calculator / metric, based on the Defra 2012 Biodiversity Off-setting model. The proposed enhancement measures will ensure that a net gain of 20% is delivered. The assessment has taken into account the level of long-term maintenance of the site that will be delivered through the proposed development. The Ecological & Landscape Enhancement Scheme is enclosed at Appendix 6 to this report.
- 6.7.76 The whole of the perimeter of the site is already comprehensively screened or has landscape schemes approved to provide comprehensive screening. Two additional areas have however been identified to add both landscaping features and biodiversity enhancement to small areas of the perimeter of the site.
- 6.7.77 The clean water lagoon to the north-west of the site will be surrounded on the eastern and southern side by a new native hedgerow. The areas around the lagoon and adjacent to the new hedgerow will be seeded with slow growing grasses and wildflowers. The existing wetland area to the south-east corner of the site will be enhanced with an area of shrub planting.
- 6.7.78 The landscaping and biodiversity enhancement will consist of:
- 121m of new native hedgerow with hedgerow trees
 - 1535m² of grassland with wildflowers around the hedgerow and lagoons
 - Shrub planting to 40% of the perimeter of a wetland area of 2014m²
- 6.7.79 In summary, the proposed and existing landscape features and ecological enhancement measures are as follows:
- Existing perimeter bund to the north-west, north, and part eastern boundary to be comprehensively planted with hedgerow and trees.
 - Existing perimeter bund to the south eastern corner comprehensively planted with willow trees and shrubs at 2m X 2m spacing. Dense coppiced willow regrowth to the southern boundary adjacent to Bluntisham Heath Road in the south-eastern corner of the site.
 - Existing wildflower seeding to road verge along the western boundary of the site seeded with TGP Roadside and Roundabout Wildflower Mix.
 - Existing dense, wide, well-established hedgerow to the western boundary with mature trees.
 - Existing trees and small hedgerows to the southern boundary.

- Proposed establishment of grassland with wildflowers around the clean water lagoon to the north-west of the site.
- Proposed establishment of new native hedge with hedgerow trees around the eastern and southern perimeter of the clean water lagoon to the north-west of the site.
- Proposed establishment of perimeter shrubs to the wetland area to the south-east corner of the site.

6.7.80 The new proposed planting and seeding will be maintained for a 5-year period or until established. All existing trees and shrubs within the planting area will be retained. Weed growth around individual plants and adjacent to the hedgerow will be controlled by herbicide, 2 applications per annum, to create a 1m width free of weeds. All failures will be replaced in the following planting season to ensure 100% stocking rate. Vegetation between the shrubs and adjacent to the hedge will be cut annually or as required. Tree and shrub shelters and spiral guards will be repositioned/maintained at each maintenance visit.

6.7.81 The seeding area will be cut twice per annum outside the nesting season. Weed infestation to be controlled by mechanical removal or broadleaved herbicide spot application.

Conclusions

6.7.82 In summary, the impact of the development on the biodiversity value of the site and the locality is thought to be extremely low. The following factors have led to this conclusion:

- The siting of the development within an established waste management facility.
- The location of the development on an existing species poor area of low habitat value.
- Minimal loss of low value habitat.
- No impact on wildlife sites of any significance.
- The retention of all existing perimeter habitats and enhancement proposals to maximise the biodiversity value of available areas.

6.7.83 Due to the limited impact of the development additional surveys are not considered to be required.

6.7.84 It is therefore concluded that no adverse ecological impacts will occur as a result of the development of the proposal and that biodiversity gains are maximised as far as practicable. The proposal is therefore compliant with Policy CS35 of the Minerals and Waste Core Strategy, Policy LP30 of the Huntingdon Local Plan and Policy 20 of the emerging Minerals and Waste Local Plan including chapter 15 of the NPPF.

Heritage Assets

- 6.7.85 Policy CS36 of the Minerals and Waste Core Strategy ('Archaeology and the Historic Environment'), Policy 34 of the Huntingdon Local Plan and Policy 21 of the emerging Minerals and Waste Local Plan seeks to prevent adverse impacts upon the historic environment.
- 6.7.86 The Application Site is not located in close proximity to designated heritage assets, the historic landscape, or other heritage assets of national or local importance. The sensitivity of the site in terms of its potential impact upon the historic environment is therefore low.
- 6.7.87 As part of the Council's pre-application response, the Council acknowledged that in terms of the potential for important buried archaeology to be contained within the site:

The report of the archaeological evaluation undertaken in March 2013 by Northamptonshire Archaeology as a requirement of condition 7 of planning permission H/05003/12/CW showed that the site has a high perched water table and the fields are full of land drains, many placed there over the last 200 years. No archaeological features were present in any of the trenches and no artefacts were recovered. The County Council's Historic Environment Team advised that no further archaeological work will be required for the development within the composting site for which planning permission was being sought in 2017.

- 6.7.88 For these reasons set out above, the proposal is unlikely to have an adverse impact upon the historic environment including the potential for affecting important buried archaeological remains. It is therefore concluded that the proposal is compliant with Policy CS36 of the Minerals and Waste Core Strategy, Policy 34 of the Huntingdon Local Plan and Policy 21 of the emerging Minerals and Waste Local Plan.

Lighting

- 6.7.89 Minerals and Waste Core Strategy Policy CS34, HLP policy LP14 and emerging MWLP policy 18 seek to protect residential and 'other amenity'. Artificial lighting is required to support the construction and operational phase of the proposed development. Lighting will facilitate safe movement of pedestrians and vehicles after dark and aid site security. A minimal approach to lighting is proposed to ensure lighting is kept to the minimum criteria to illuminate the task at the times which it is required.
- 6.7.90 The proposal will involve the use of high-quality luminaires throughout the site to ensure that light is focussed downwards onto the ground or other surfaces in the horizontal plane, minimising the potential for direct upward light, glare, light spill and light intrusion. It is proposed that column mounted luminaires

(less than 4 metres in height) are only intended for the lighting of the site access, internal site road and the unadopted footpaths / parking areas.

- 6.7.91 Where luminaires are proposed to be installed close to the site boundary, the luminaires will be orientated away from the boundary to focus light into the proposed development to minimise the potential for obtrusive light to occur outside of the site boundary.
- 6.7.92 The proposed strategy of using high-quality luminaires throughout the site to ensure that light is focussed downwards onto the ground or other surfaces in the horizontal plane will ensure that no unacceptable adverse residential or local amenity related impacts will arise in compliance with Minerals and Waste Core Strategy Policy CS34, HLP policy LP14 and emerging MWLP policy 18.

6.8 Employment & Economics

- 6.8.1 The NPPF and HLP policy support economic growth and the development of businesses in rural areas. The proposal represents a significant financial investment into the development of the existing waste management facility. The proposed development will generate 22 full time jobs together wider indirect and induced employment. As well as direct employment, the proposed development will create indirect and induced employment opportunities as a consequence of how the supply chains operate.
- 6.8.2 During construction, the proposed development will give rise to direct employment at full time equivalent levels of around 30 jobs annually over the construction phase. The creation of temporary construction jobs and full-time jobs during the operation of the facility contributes significant levels of Gross Value Added (GVA) to the local economy through direct, indirect and induced employment.
- 6.8.3 The economic and employment benefits of the proposed development are matters to which significant weight should be attached in the planning balance. The proposed development will therefore comply with the aspirations of the NPPF and HLP by supporting economic growth and the development of businesses in rural areas.

7 CONCLUSION

7.1 The Planning Balance

- 7.1.1 This Planning Statement accompanies a Planning Application on behalf of Envar Composting Ltd seeking planning permission for the construction of a Dry Anaerobic Digestion (AD) facility, Healthcare Waste Recovery Facility, Pellet Fertiliser Facility, Waste Transfer Station, Vehicle Re-Fuelling Station, Biomass Fuel Storage Building, Surface Water Storage Lagoons and ancillary development.
- 7.1.2 The following sets out the conclusions of the assessment of the proposal against the Development Plan and other material considerations in accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004.

Principle of Development

- 7.1.3 The principle of a waste management and energy related uses on the Application Site is firmly established by the granting of various planning permissions over many years. The Application site is located on land which is allocated in the Development Plan for waste recycling and recovery activities, and as a future 'Waste Management Area' within the emerging Minerals and Waste Local Plan which has been through independent examination, and subject to recommended modifications by the Planning Inspector, is likely to be adopted by the Council in the summer of 2021. Significant weight should therefore be attached to the site's allocation as a 'Waste Management Area' in the emerging Minerals and Waste Local Plan.
- 7.1.4 The recycling of green and food waste, including the recovery of heat from the Healthcare Waste Energy Recovery Facility, will complement existing activities on-site and will, in part, make use of previously developed land. There are clear co-location benefits between the various elements of the proposal in terms of utilising on heat and power generated on site, generating a renewable form of fuel in the form of biomethane, turning waste into a valuable agricultural fertilisers and minimising waste to landfill. The sustainable credentials of the proposal are therefore matters which should be given significant weight in the planning balance.

Environmental Impact

- 7.1.5 The Environmental Impact Assessment process has fed into the production of the accompanying Environmental Statement, which is part of the supporting documentation for the Planning Application, has considered an appropriate range of environmental issues as established as part of the pre-Application

engagement with the Council and the 'Scoping' exercise that included engagement with statutory and non-statutory stakeholders including the local community.

- 7.1.6 The findings of the EIA concluded that having taken into account the proposed mitigation the effects of the proposed development are not considered to be significant. The impacts which could be considered to be contentious (landscape and visual, air quality/human health, and noise) are capable of being fully mitigated through an iterative design process and through careful consideration of emissions control and abatement techniques.
- 7.1.7 In respect of air quality, assessments have focused on the principal emissions to air, including:
- potential impact on local air quality.
 - impact of emission concentrations around the key routes associated with material deliveries and waste removal.
 - the risk to the health of people living and working in the vicinity of the proposed Dry AD and Healthcare Waste Energy Recovery Facility.
- 7.1.8 The findings of the EIA work demonstrates that the proposed development will not give rise to significant adverse air quality effects for either human or ecological receptors in either the short-term or the long-term.
- 7.1.9 In terms of noise, the assessment concludes that the operations during the early morning, daytime and evening period would result in noise levels equivalent to the present operations and will not result in adverse noise impacts during these periods.
- 7.1.10 Overnight, the initial assessment indicates that the operation of the Dry AD and Healthcare Waste energy recovery plant has the potential to result in adverse impacts at surrounding properties. It is therefore proposed to incorporate additional mitigation measures into the final design of the proposed facility to ensure noise levels are reduced to a satisfactory standard to minimise the potential for adverse impacts. Calculations made in the Noise Assessment on the basis of likely mitigation measures, demonstrate that it is possible to reduce noise levels to a satisfactory level.
- 7.1.11 It is therefore proposed that the noise attenuation measures for the plant are developed during the detailed design stage. It is suggested that, on the basis planning permission is granted, a planning

condition is imposed requiring further noise assessment to be undertaken to demonstrate that the operation of the new plant would not result in adverse noise impacts.

- 7.1.12 In respect of the landscape and visual impact the proposed development is located within an existing small developed industrialised area with a number of other buildings / sheds within a wider area. The existing small industrialised area already hosts buildings, large sheds, moving machinery and fencing that are characteristic of the proposed development. In overall terms, the proposal, when considered in an increasingly broad context of the landscape, is anticipated to be assimilated into the existing landscape and views. The existing area is considered to have the capacity to absorb the introduced characteristic elements without overarching change to the landscape character of the area and the loss of moderate to low sensitivity and uncharacteristic elements is considered acceptable. It is therefore concluded that no unacceptable landscape and visual impacts will arise.
- 7.1.13 The potential impact of the development on other environmental issues such as, traffic, flood risk, surface water drainage, ecology and cultural heritage have also been assessed. The conclusion in respect of each of these is that the nature of the development and the design process has ensured that there will be no adverse impacts on any of these issues.
- 7.1.14 With mitigation in place, where appropriate, the majority of environmental effects identified through the EIA process associated with the Proposed Development have been classified as not significant.
- 7.1.15 Clear consideration is given to planning policy across all of the disciplines and there are no policy conflicts.

Overall Conclusion

- 7.1.16 The principle of a waste management development on the application site has already been established. The proposal is also located on land which is allocated in the Development Plan for waste recycling and recovery activities, and as a future 'Waste Management Area' within the emerging Waste Local Plan (soon to be adopted). The principle of the development is therefore acceptable in land use planning terms.
- 7.1.17 The application has been subject to EIA which has in turn resulted in a detailed and robust ES. With mitigation in place, where appropriate, the majority of environmental effects identified through the EIA for the proposed development have been classified as not significant.
- 7.1.18 The proposal has been assessed against the Development Plan and other relevant material considerations which has demonstrated that that the location of the proposal is entirely appropriate and does not conflict

with existing or emerging local planning policies and will not give rise to any unacceptable adverse environmental, health or local amenity related impacts.

7.1.19 In overall conclusion, it is considered that the proposed development should be supported and granted planning permission.

APPENDIX 1: PRE-APPLICATION ADVICE

APPENDIX 2: NEED ASSESSMENT - HEALTHCARE WASTE

APPENDIX 3: TRAFFIC STATEMENT & TRAFFIC MANAGEMENT PLAN

APPENDIX 4: FLOOD RISK ASSESSMENT & SURFACE WATER DRAINAGE

**APPENDIX 5: PHASE 1 ECOLOGY SURVEY REPORT &
ECOLOGICAL APPRAISAL REPORT (BUILDINGS)**

APPENDIX 6: ECOLOGY & LANDSCAPE ENHANCEMENT SCHEME

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