

WHITTLESEY INCINERATOR BOTTOM ASH AND CONSTRUCTION & DEMOLITION MATERIAL RECYCLING FACILITY

NON -TECHNICAL SUMMARY

V2 - October 2021





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**PLANNING APPLICATION FOR THE DEVELOPMENT OF AN
INCINERATOR BOTTOM ASH AND CONSTRUCTION & DEMOLITION
MATERIAL RECYCLING FACILITY – LAND AT THE FORMER SAXON
BRICKWORKS, OFF PETERBOROUGH ROAD, WHITTLESEY**

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Non-Technical Summary

1. Introduction

- 1.1.1 This revised Non-Technical Summary (rNTS) is being submitted to Cambridgeshire County Council to accompany a full planning application and Environmental Statement (ES) for the development of an incinerator bottom ash (IBA) and construction and demolition (C&D) material recycling facility. There is no incinerator being built and nothing will be burnt on the JAR site. The Application Site is located to the south of, and accessed directly off, the A605 Peterborough Road, about 0.5km to the west of Whittlesey.
- 1.1.2 The planning application is being made under the requirements of the Town and Country Planning Act 1990. A non-technical summary of the information provided in the ES is required to be submitted in support of this application under the requirements of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017.
- 1.1.3 Bond Planning Ltd has produced and submitted the ES and Planning Application on behalf of the Applicant, Johnsons Aggregates & Recycling Ltd (JAR). The structure of the ES has been guided by the response from Cambridgeshire County Council to a formal request for a Scoping Opinion in October 2020.
- 1.1.4 JAR is the UK's second largest IBA recycling firm, with over 180 staff and, to date has recycled over 1.5 million tonnes of IBA, diverting all this material from landfill. IBA is the ash resultant from incineration (which JAR does not do). It is a safe non-hazardous material that contains metals which are removed and sold, resulting in a secondary aggregate which is sold to reduce the requirement for primary quarried materials being excavated from the earth.
- 1.1.5 JAR has never sent anything to landfill in its 21 year history and JAR currently recycles approx. 600,000 tonnes per annum of IBA, following all government laws and best practices, with no non-compliances in the history of the company. JAR is Environment Agency and Local council regulated and audited annually, with industry leading techniques in recycling of IBA, investing heavily in latest technology to recycle IBA in the best way to reduce the carbon footprint of the UK, while employing local people and apprentices to train and invest in the people of the area to develop skilled workers.

- 1.1.6 The Environmental Impact Assessment (EIA) process has been carried out simultaneously with the design of the final layout and scheme design, to ensure that all potential significant environmental impacts identified during the EIA process could be taken into consideration in the development design. Consequently, the final development proposals incorporate all mitigation measures recommended from the EIA process.
- 1.1.7 The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 require that an ES should include '*a summary in non-technical language of the specified information.*' The information that is specified is:
- A description of the development, including information about the site and the design and size of the development;
 - The data that is needed to identify and assess the main effects that the development is likely to have on the environment;
 - A description of the measures that are proposed to avoid, reduce or remedy any significant adverse effects; and
 - An outline of the main alternatives that have been studied by the applicant and the reasons for choosing the Application site.

2. Description of the Site

The Application Site

- 2.1.1 The proposed development will take place at the former Saxon Brickworks site, which currently benefits from a variety of planning permissions for waste management purposes. The Application Site is located to the south of, and accessed directly off, the A605 Peterborough Road, about 7km to the east of Peterborough and around 0.5km to the west of Whittlesey. The Application Site is wholly within, and surrounded by, the former Saxon Brickworks site, with residential properties to the north and east beyond the wider site embankments, a railway to the south and bare land to the west.
- 2.1.2 The nearest residential property is located adjacent to the site's access with Peterborough Road, around 250m from the proposed recycling operations. It is important to note when considering the potential impacts that may arise from this proposal that the Application Site sits in the bottom of a former clay pit and is around 22m below the level of the properties surrounding the wider Saxon pit.
- 2.1.3 The Application Site is accessed directly from the A605 via an established and to standard HGV access point.

3. Description of the Development

- 3.1.1 The proposed development involves the change of use of existing buildings and hardstanding from plastic recycling to the importation and recycling of IBA and C&D material. There is no incineration or burning on site, nor will municipal, commercial & industrial (C&I) or hazardous material be imported to the site at any point. It is proposed that the site will accept up to 250,000 tpa of IBA and 50,000 tpa of C&D material for recycling when fully operational, generating over 30 new jobs in the area using local skilled labour and apprentices.
- 3.1.2 The development of the very western edge of the Application Site will see some previously quarried overburden material being excavated and placed elsewhere on the wider Saxon pit site, and the ground levelled and hardsurfaced to increase the storage area for recycled products all in line with government and industry standards.
- 3.1.3 The products created by the proposed development are:
- IBAA – a secondary/alternative aggregate used in the construction industry (reducing the need for quarries);
 - Ferrous and non-ferrous metals recovered primarily from the IBA (reducing the requirement for mining globally).

Construction Phase

- 3.2.1 Construction will include alterations to the internal access highway arrangements to improve HGV access in and around the site and the laying of an impermeable concrete hardstanding for the imported non-combustible IBA to be stored on while it matures. This IBA storage area will have a sump that will receive all surface water from this area, along with a small impermeable that ensures a seal to prevent water egress in line with regulation. The perimeter of the IBA storage area will be made up of a 5m high concrete block wall to contain the IBA.
- 3.2.2 Once matured, the IBA will be loaded into an industrial Screener, on the outside of the main recycling building. This will pre-screen the IBA before it is transported inside by conveyor into the main recycling building. The recycling buildings will be home to world-leading recycling machinery to ensure that IBA material is screened, sorted and processed to the best quality standard for maximum efficiency. The process is similar to that used at JAR's two other EA regulated and audited IBA recycling sites in the Midlands. The buildings here at Whittlesey will incorporate the newest technology, which has been developed through years of expensive R&D that

JAR has gone through in the 12 years of recycling IBA to date, with over 1.5million tonnes recycled so far from our two other IBA plants diverting millions of tonnes away from Landfill.

- 3.2.3 It was originally proposed that the external ground outwith the IBA storage areas would be simply graded and a fresh layer of permeable surface laid down. However, to improve the overall site drainage scheme it is now proposed to lay a concrete, impermeable surface across the whole site. This will improve overall surface water management and ensure as smooth a surface as possible for vehicles to traverse other.
- 3.2.4 Improvements to the surface water ditches around the site will be made, with all external surface water continuing to feed into a previously approved water course system.
- 3.2.5 Car and cycle parking provision will also be provided on the eastern side of the site. It is proposed to erect a small two-storey cabin adjacent to the main recycling building to be used for offices, staff canteen and washing (welfare) facilities etc. There will also be a number of storage tanks erected close to the same building for holding collected surface water.
- 3.2.6 There will be finally regrading of land to the west of the main recycling building in line with the Ecology recommendations. This will mean taking previously quarried overburden material and placing it elsewhere within the Saxon pit site (permission already exists for this deposition) to create a new ground level that matches the existing.

Operational Phase

- 3.3.1 IBA will be imported directly from incineration plants via articulated HGVs, C&D will be imported directly to site in the same manner. The HGVs will enter the site and deposit the IBA and/or C&D materials in the specified locations, in line with legislation. HGVs entering the site will backhaul recycled products out of the site whenever practicable – thereby reducing transport movements and carbon footprint.
- 3.3.2 The proposed working hours are:
Importation and depositing on site, in the designated storage areas, of IBA and C&D material – 24/7 including Sundays and Bank Holidays (except Christmas Day);

- External crushing and screening of C&D material – 08:00 – 18:00 Monday to Fridays and 08:00 – 16:00 on Saturdays;
- External Movement, loading and repositioning of IBA, IBAA and C&D – 06:00 to 22:00 hours Monday to Friday and 06:00 – 22:00 on Saturdays;
- Processing of IBA within recycling building 1 - 06:00 to 22:00 hours Monday to Friday and 06:00 – 22:00 on Saturday;
- Processing of IBA within recycling building 2 and use of associated machinery - 24/7 including Sundays and Bank Holidays (except Christmas Day); and
- Essential servicing and maintenance of plant and other similar works of an essential nature – 24/7 including Sundays and Bank Holidays (except Christmas Day).

3.3.3 The operational activities are summarised as follows:

- Unprocessed IBA will be imported to the site and stored within a designated storage bay before undergoing an ageing process;
- The material will be fed into a trommel / screener and separated into two fractions (>50mm and < 50mm);
- The >50mm material may be crushed & screened further;
- The <50mm will be processed using various screeners to size the material. The various sized fractions will then be processed using further screening, inductive separation and eddy current magnets, where ferrous and non-ferrous metals are recovered and the IBAA is separated off;
- C&D materials will be crushed and screened dependent on customer requirements; and
- The processed material may then be stored as finished product ready for sale or be mixed and stockpiled to form aggregate. Ferrous metal and non-ferrous metal stockpiles will be stored on site pending sale.

3.3.4 The machinery, earthmoving equivalent, likely to be used externally on site to move and load the material includes a 360 loader, front end loading shovel, telehandler and screener.

3.3.5 The site operations will generate up to 30 full time positions starting in June 2021, including apprentices where possible, with approximately 20 drivers also being supported by the proposals. This is a significant economic benefit to the area.

4.0 Environmental Issues

Noise

- 4.1.1 A detailed Noise Assessment (NA) has been undertaken by Clements Acoustics Consultancy in support of this application. The NA has also been updated following initial consultation responses and has considered the baseline noise measurements at the nearest residential properties to the Application Site, the likely traffic and construction noise effects at these properties from the importation and site operations and practical noise mitigation measures to reduce the noise to within acceptable levels, if this is considered necessary.
- 4.1.2 The NA was carried out in accordance with ISO 9613-2: 1996 methodology. The results of the baseline noise monitoring indicate that current noise levels at local sensitive receptors are relatively elevated and significantly affected by local road noise. Predicted (worst case) noise levels associated with the proposed development have been shown to be acceptable at local properties. The NA concludes that overall, with mitigation, noise impacts are predicted to be negligible and not perceptible. A revised Noise Management Plan has also been submitted illustrating how the Applicant will ensure that on-site noise is managed and mitigated satisfactorily.

Odour

- 4.2.1 An Air Quality Assessment (AQA) has considered the likelihood of odour impacts arising from the site, which has guided the preparation of an Odour Management Plan (OMP), also submitted with the application.
- 4.2.2 The AQA has also been revised in the light of the consultation responses and concludes that there is a very low probability of odour emissions from the site, which is 22m below surrounding ground level and well distanced from local sensitive receptors, creating any significant impacts. The Applicant will conform to the requirements of the revised OMP at all times to further mitigate the risks.

Dust and Air Quality

- 4.3.1 A detailed Air Quality Assessment (AQA) has been undertaken by HSP Consulting of dust and emissions likely to arise from the proposed development. It has assessed the likely impacts on local air quality by way of particulate and gaseous emissions arising from both the recycling operations on site and the potential impacts arising from HGVs attending the site. The AQA has taken account of advice and data from the UK National Air Quality Strategy and Fenland DC.

- 4.3.2 Baseline data from locations around the Application Site has been obtained and the AQA has assessed the likely impacts from the proposal on local sensitive receptors (properties and ecological interests) and against national air quality objectives. The AQA concludes that there would be no risk of the annual mean PM₁₀ objective value being exceeded. Modelling of road traffic emissions has demonstrated the emissions associated with the proposal would have an 'imperceptible' to 'very low' impact on local air quality at all locations within the study area. Such an impact is not considered to represent a significant effect.
- 4.3.3 Overall, the revised AQA concludes that the proposed development will not cause an effect considered to be significant and would not contravene local or national planning policy or lead to any breaches of the Air Quality Strategy objectives.

Highway Impacts

- 4.4.1 The planning application is accompanied by a Transport Assessment (TA) produced by HSP Consulting Ltd that has considered the baseline conditions in and around the Application Site and the capacity of the local network to accommodate safely the HGVs numbers likely to be generated by this proposal.
- 4.4.2 The TA notes that the site benefits from an existing, to standard access direct off the A605 and that all HGV traffic will turn right into the site and left out – therefore avoiding travelling through Whittlesey. The TA also notes that the Application Site is currently used for waste management purposes, with HGV access previously being considered to be acceptable.
- 4.4.3 To import the maximum throughput proposed of 250,000 tpa of IBA and 50,000 tpa of C&D, assuming a 5.5 day week and a 50 week working year, there would be an average of 92 HGV movements per day (46 in and 46 out) - assuming no backhauling of recycled material takes place (this is the worst case scenario). This would result in a predicted 6 HGV movements in the morning peak hour and 3 in the evening peak.
- 4.4.4 The TA has considered the likely impacts against the current HGV movements associated with the plastic recycling operation and infilling operations and concludes that the development can take place without significantly affecting highway safety and capacity on all roads and junctions between the site entrance and the A1(M). The existing access has been designed to an acceptable standard and a Workplace Travel Plan has been submitted to demonstrate the Applicant's commitment to sustainable travel options.

Flood Risk and Surface Water Management

- 4.5.1 The ES is accompanied by a Flood Risk Assessment (FRA) and Surface Water Management Strategy produced by HSP Consulting Ltd – both of these documents have been reviewed and updated following initial consultation responses. The revised FRA considers the risk of fluvial flooding (river flooding), the existing and proposed drainage system, surface water and overland flow, groundwater and drainage ditches, as well as existing small ponds.
- 4.5.2 The FRA notes that the Application Site is located within the River Nene's Flood Zone 3, although it also notes that this is purely because it sits 22m below the ground levels surrounding the former Saxon pit and that there are no pathways for flood water to enter the site from the River Nene (which benefits from flood defence protection against a flood event equivalent to a 0.5% chance in any year (1 in 200).)
- 4.5.3 The FRA has considered advice from the Middle Level District Internal Drainage Board (IDB) and the Environment Agency in order to assess fully the potential flood risks arising from the proposed development and concludes that the proposals conform to national guidance in terms of flood risk both at the application site and beyond the site's boundary and that there is no conflict with relevant Development Plan Policies relating to flood risk and general water management.
- 4.5.4 Surface water drainage is also considered in depth and the FRA notes that there is an existing approved system in place that collects surface water run-off from the embankments around the Saxon site into a single drainage system and lagoon. The current proposals will mean that the surface water management on the Application Site will retain all rainfall within the site boundary, which will actually improve the current surface water management on site and reduce the risk of the current lagoon (off site) being overloaded by extreme storm events.

Geo-Environmental Ground Assessment

- 4.6.1 A Phase 1 Geo-Environmental Desk Study (GEDS) has been prepared by HSP Consulting Ltd which considers background historical and geo-environmental data to address, where practicable, any legacy land contamination and stability matters.
- 4.6.2 The GEDS notes that the Application Site is as-worked ground (previously developed land) where the natural land surface has been lowered significantly as a result of man-made excavations. It also considers that from a ground stability perspective, risks are 'Negligible' to 'Very Low', with the exception of the Potential

for Landslide Ground Stability Hazards, which it considers to be 'Very Low' to 'Moderate'.

- 4.6.3 The GEDS raises no serious concerns about the site and concludes by making recommendations regarding further intrusive works to be undertaken to fully establish the condition of the underlying ground. Much of this intrusive work, including boreholes and trial pits has already been completed and will form a Phase 2 document. It is considered that the submission and approval of the Phase 2 document can be covered by planning condition.

Ecology

- 4.7.1 Peak Ecology was instructed to undertake a Preliminary Ecological Assessment (PEA) involving a Desk Study and a Phase 1 Habitat study of the Application Site and its immediate surrounds and to consider potential impacts on nearby internationally, nationally and locally designated sites of ecological interest. Locally designated sites include the Nene Washes Special Area of Conservation (SAC), Nene Washes Ramsar Site (SPA and SSSI) and the Kings Dyke Nature Reserve.
- 4.7.2 The Habitat Survey found no habitats of interest on those parts of the application site that are presently covered by buildings and hardstanding and which form part of the operational waste management facilities. There were habitats of interest noted on the area of previously quarried overburden material, which comprises an area to the west of the main recycling building.
- 4.7.3 The PEA found no evidence of protected species on the Application Site, although it does recommend further surveys for the area of previously quarried overburden material before any groundworks commence on this material.
- 4.7.4 Importantly, the PEA and the AQA conclude that there will not be any significant impacts on the designated ecological sites and that, subject to the implementation of recommendations, it is considered that the proposed development will have no significant impact on ecological interests both on and off site, including the important designated assets in the local area.
- 4.7.5 A further assessment has taken place of the net habitat loss arising from the proposal. While this figure is relatively very low, there is a requirement to provide a net gain in biodiversity of at least 10%. This can be achieved by a scheme either

within the wider Saxon Brickworks site or at an off-site location perhaps owned by CCC or the Wildlife Trust.

Landscape Impacts

- 4.7.5 It is important to appreciate that this application, with the exception of the erection of a small double storey employee welfare building and minor excavations of the area of previously quarried overburden material, is for a material change of use of the Application Site, which sits 22m below surrounding ground level and can barely be seen from external public vantage points, save for some second-floor bedrooms in excess of 250m away.
- 4.7.6 There will be no demonstrable change to the local landscape character and it is clear that the proposals will have no immediate impact on local visual amenity. For all intents and purposes there will be no discernible change when considering the current permitted site operations and, therefore, it is considered that the proposal do not conflict with Development Plan policies in this regard.

Cultural Heritage

- 4.8.1 There was a large chimney stack dating from the 1970s on the site but this was removed earlier this year by the landowner. It is understood that a catalogue of the historic relevance of this feature and its setting was completed.
- 4.8.2 There are no proposals whatsoever in this application that would have any impact on any designated or non-designated historical asset or its setting and the site would continue to appear virtually identical to its current state – which is that of a waste management facility, set in a 22m deep hole. Therefore, there is no demonstrable need for further historic survey work and any request for the same is considered to be wholly unreasonable and not commensurate with the scale of development proposed in this instance.

5. Cumulative Impacts

- 5.1.1 The Town and Country (Environmental Impact Assessment) Regulations 2017 require developers to consider the cumulative impact of a proposed development. This could be the impact of one or more sites working in a locality at the same time, successively over a period of time or cumulation of a number of separate impacts from the same development.

5.2.2 In assessing the individual impacts of the proposed development, including noise, dust, highways etc, the ES (as revised) considers that impacts would be individually not unacceptable. The ES goes on to conclude that there is nothing out of the ordinary or unusual about the proposed development which would make acceptable individual impacts unacceptable in combination or cumulatively. It is considered that the proposed development would not represent a significant environmental impact for the area and would not generate unacceptable cumulative impacts.

6. Alternatives

6.1.1 The ES, as required by the Town and Country (Environmental Impact Assessment) Regulations 2017, has assessed the application against a range of alternative options. The applicant has studied a range of alternative schemes and working methods, all of which have their own pros and cons. The main alternative considered by the applicant was to reduce the throughput, thus reducing the number of HGVs accessing the site on a daily basis and ensuring that the site is capable of managing the lower volume of material.

6.1.2 The applicant has also considered alternative working methods, including a variety of machinery and plant for use on the site. The proposed design has been guided by the need to use the most appropriate machinery in cognisance of the relative noise, emissions and capacity aspects of various sizes and types of such machinery.

6.1.3 The 'do nothing' option has also been considered, which would see the site continue to be used for plastic recycling with no limit on throughput or HGV numbers. Overall, it is concluded that the proposed scheme would provide a much improved and more sustainable restoration scheme for the Application Site over the long term with the minimum of negative impacts during the construction phase.

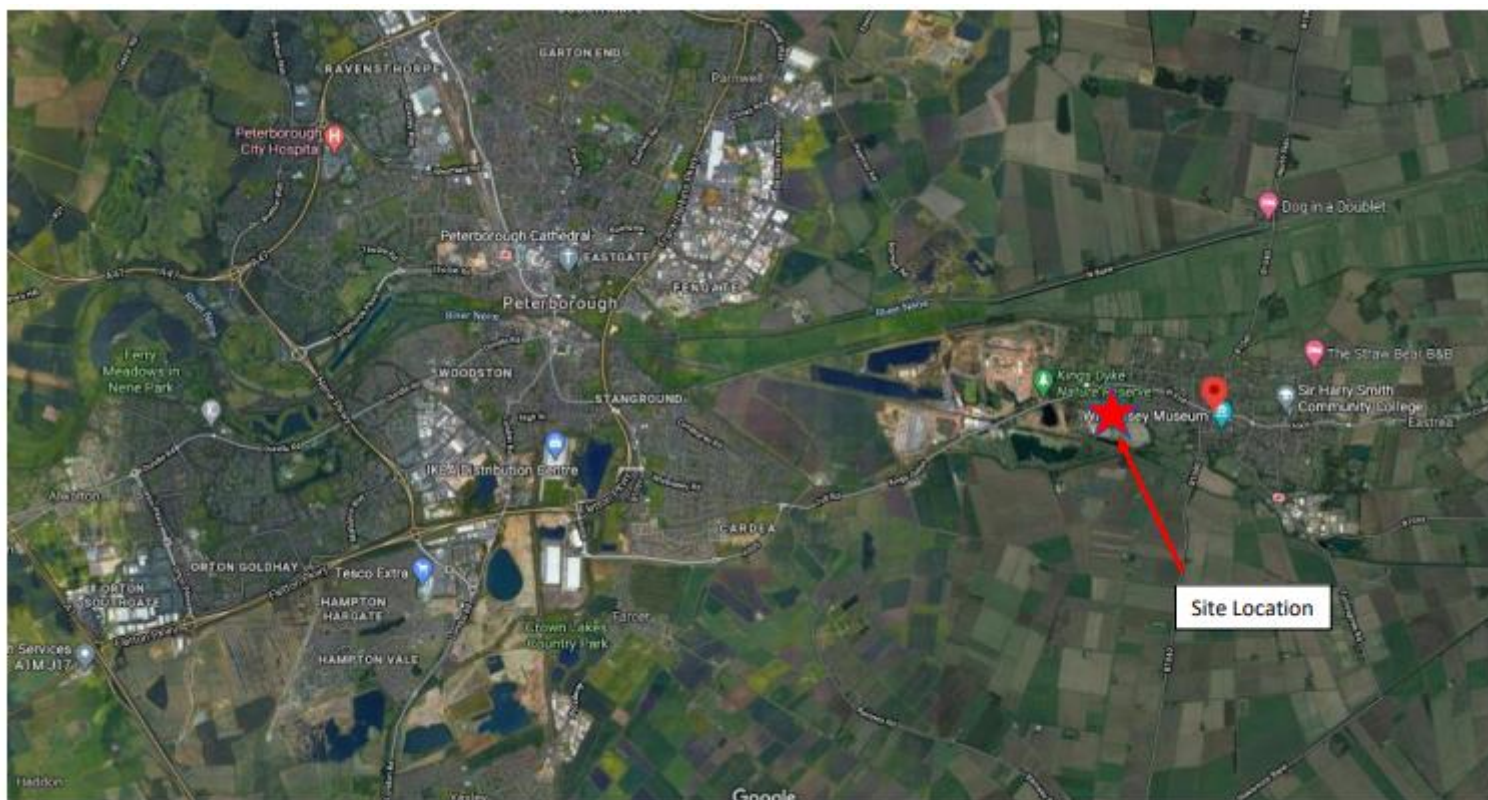
7. Planning Policy

7.1.1 The ES includes a comprehensive assessment of the relevant Development Plan and national planning policies pertinent to the application. The policy assessment concludes that the proposed development would provide a much needed facility for the production of secondary/alternative aggregates within the Plan area, where it is considered that there is a significant shortfall in capacity. Further, it is considered that there is no conflict with the Development Plan and that there are no material planning considerations that would justify refusal of planning permission.

8. Conclusions

- 8.1.1 The EIA undertaken as part of the development of this planning application has considered in a detailed and comprehensive manner the potential environmental impacts likely to arise from the proposed development of an IBA and C&D recycling facility at the extant operational waste management site at the former Saxon Brickworks site.
- 8.1.2 The ES concludes that, with appropriate mitigation measures in place, the likely impacts of the proposed development will not be unacceptable and not exceed accepted thresholds. The proposed development will deliver long term economic and sustainability benefits arising from the moving of significant quantities of Energy from Waste (EFW) biproduct up the hierarchy, along with the production of much-needed secondary aggregates, helping to husband the existing sand and gravel sites in the locality. The application proposals are therefore considered acceptable in terms of their overall likely impacts.

Appendix A – Site Location Plan



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Appendix B – Red Line Boundary Plans



