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**From:** Russell Watkins  
**Sent:** 09 February 2023 11:22  
**To:** Emma Sheppard  
**Subject:** F/YR23/0069/F - A W Jenkinson, Land south of New Saxon Works, Peterborough Road, Whittlesey

**Change of use of site for the purposes of wood processing (B2 use) for a temporary period of 2 years (retrospective)**

Good morning Emma,

The Environmental Health Team note the submitted information in support of the aforementioned planning application.

Having observed the details within the Odour Management Plan (Issue date: 23.12.2021) there is recognition of Environment Agency document *H4 Odour Management*, but there doesn't appear to be any acknowledgement of what the odour is assessed against or the significance of the impact in terms of any methodology or criteria that would be expected as demonstrated by an actual Odour Impact Assessment.

Mention is given in Para 5.1 of the report to the assessment of odour at point of delivery as follows;

- (i) Odour assessment on delivery
- (ii) Odour assessment of stockpiles by onsite operators
- (iii) Complaint monitoring
- (iv) Regular site inspections by a group manager or deputy.

It is later stated that a Foreman or deputy will undertake this, but what is this measured against and at which location(s)? Consideration must be given to areas such as those identified/highlighted on the aerial map in Para 3.2.1 as these are among some of the locations that environmental health has observed issues, and at the time of writing continues to receive complaint's in respect of alleged excessive odour from sources attributed to the A W Jenkinson.

Section 2 of the Odour Management Plan gives mention to 'fines' however there is no specific description as to what this includes and how any resulting issues in respect of odour and dust will be controlled.

It is worth mentioning that Photograph 1: *Interlocking concrete 'lego' blocks* (Para 4.3) shows the externally stored materials to be well in excess of the wall height. Any such structure should be of a sufficient height to contain the material and reduce the risk of excessive dust as a result of wind whip. Measures to control dust should be in accordance with DEFRA Process Guidance Note 6/02(12) '*Statutory guidance for the working of timber and manufacture of wood-based products*'.

It is noted that Para 4.17 of the Planning Statement provided by Land & Mineral Management (12.09.2022) states '*The nature of the virgin wood to be handled means that odour should not arise, however in recognition that odour is a sensitive issue locally an Odour Management Plan has been prepared which accompanies the application*'. This again doesn't provide any reference to an actual odour impact assessment having been undertaken, and there is also reference to a shredder/chipper that is brought to site to process the oversized material in the external yard area which is then discharged into the building in a similar fashion to the screening operations. I see this as a possible issue in that the materials requiring shredding can therefore remain exposed to the elements for several weeks in potentially ideal conditions to accelerate decomposition as highlighted in the Odour Management Plan itself, and therefore increase the potential for odour. In addition no controls for noise or dust (particulates) have been identified for this external processing.

From images provided in documents to support this application and having visited Saxon Pit at the start of January 2023, it is obvious that the building itself is currently in a state of disrepair that renders it ineffective to be considered a sufficient for odour (dust or noise) mitigation purposes. Coupled with this, there appears to be no apparent covering of materials with the assistance of bunding and associated clamps/covers that could be considered an effective means to reduce the potential for adverse impact from odour and dust.

In terms of details specific to dust, Para 4.18 of the Planning Statement gives mention to a Dust Management Plan. This is however very brief and again appears not to have followed an actual dust impact assessment. Where mitigation measures have been identified, such as the sweeping of unmade 'roads' around AW Jenkinson in particular are likely to be ineffective and actually lead to increased dust production. There appears also to be no mention of actually dampening down surfaces which would be considered a more effective mitigation technique. This service does acknowledge and welcome the inclusion of a 5mph maximum speed for vehicles.

As with odour, the building structure requires improvements to be considered effective to contain airborne particles or to produce a negative pressure environment whilst implementing necessary measures for to protect operatives inside.

Details are lacking on the on the Dust Management Plan. Impacts have not been identified, the report is not specific to this site, mitigation measures have not been detailed, and locations and monitoring techniques have not been established . The plan should also considered further dust control measures, such as handling of the material and what is required in terms of dampening down any materials that cannot be immediately covered for any reason, especially during adverse weather conditions.

The monitoring procedure and complaints procedure should identify monitoring techniques, monitoring limits and remediation measures available on site. Where equipment is used, it shall be installed, operated and maintained to the manufacturer's instructions, British standards and associated industry guidance.

The Council's environmental health service have in addition to the above, received complaint's relating to noise whilst AW Jenkinson were operating. Para 4.18 of the Planning Statement briefly mentions noise making activities in terms of one only limited processing activities taking place and with only one item of processing plant operating at any one time. Mention is that given to the loading shovel to move material on site, including loading and unloading of vehicles and their associated white sound reversing alarm. I have personally observed the use of a generator to supply a lighting column and staff welfare facility, as well as early morning use of a Terex ECOTEC mobile equipment in 2022, which at the time of observation, appeared to be the most excessive single noise source when monitoring to the rear of properties on Priors Road.

It is therefore imperative that a robust Noise Impact Assessment is undertaken by a suitably qualified acoustic consultant, as this service certainly believes that this subject warrants further attention. The subsequent report should then be used to form the basis of a Noise Management Plan to effectively mitigate any potential for noise breakout to adversely impact of the local amenity.

Concerns have been raised directly to this service regarding the processing of green wood and the potentially detrimental impact on human health as a result of exposure to fungal spores. Whilst there doesn't appear to be any Local Air Quality Management (LAQM) or Pollution Prevention and Control (PPC) guidance specific to this, it is the recommendation that further information is provided by the applicant, as studies have been undertaken on the exposure from processing in sawmills, and therefore this matter needs to be fully risk assessed in the interests of not only the local amenity, but also those directly exposed on site and within the curtilage of A W Jenkinson.

It is the opinion of this service that the impact of odour, dust and noise from activities on site have to date been insufficiently assessed, not only their relevance individually, but also from a cumulative standpoint.

Therefore, for the reasons provided, further information is required before this service can further consider to support this application.

Kind Regards

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