

This is an important update, New EA permit issued:

PUBLIC STATEMENT: Saxon Pit Lagoon Discharge into King's Dyke - Unresolved Contamination Pathways and Testing Gaps, Permit EPR/YB3895AC/A001

Saxongate Residents Group - 16 February 2026

On 11 February 2026, the Environment Agency announced it had granted a discharge permit (EPR/YB3895AC/A001) allowing East Midlands Waste Management Ltd to release surface water from Saxon Pit lagoon into Kings Dyke. This formalises an activity which has taken place for many years without a discharge permit. The EA's community briefing acknowledged 'Some elevated levels were detected in 2025, but detailed modelling confirmed the discharge still meets EQWS.' The briefing does not identify which substances showed elevated levels, the concentrations detected or the sampling context. The EA concluded that 'no environmental impact has been identified' and that the discharge meets Environmental Quality Water Standards. No details of the modelling or the underlying data have been published, and the source data for the Multi-Agency Public-Health study referred to in the EA briefing has not been released. Saxongate continues to push for access to that test data.

The EA briefing notes that Middle Level Commissioners previously refused discharge consent in September 2025 because the EA permit had not yet been determined. The briefing states that MLC consent is not automatic and that the operator must apply within six months of EA permit approval.

In this update we have included an open letter to the Middle Level Commissioners.

Saxongate has submitted detailed technical objections concerning greywater recycling at the adjacent JARL IBA facility and the risk of cross-site contamination. Those questions remain unanswered, yet the discharge permit has now been granted by the EA, we have yet to see the full permit details.

One significant gap in the Multi-Agency Public-Health study is that incinerator bottom ash, the primary material processed on the site and the main issue residents have repeatedly raised as a long-term pollution risk, was not investigated as a contamination pathway. No targeted testing was conducted for IBA-specific contaminants (persistent organic pollutants, or PFAS) in lagoon water, dust samples, or boundary soils. The study tested for legacy industrial metals (cadmium and lead) rather than IBA-signature contaminants. Soil samples were taken southeast of the site despite prevailing south-westerly winds. The livestock pathway tested for cadmium, which does not bioaccumulate in eggs.

We therefore submit the following concerns for public record and request Middle Level Commissioners consider these matters before granting separate discharge consent.

1. Recent Evidence Not Addressed

On 11 February 2026, we submitted an updated objection referencing press-published photographs of current site conditions at Saxon Pit. It appears the discharge permit was granted the same day. Our technical questions regarding cross-site contamination risk assessment remain unanswered. The detailed permit conditions have not yet been published.

That objection identified the lagoon discharge as part of an integrated water management system across the site, including the wedge-pit greywater recycling system at the adjacent Johnsons IBA facility. Press-published photographs from earlier this month show substantial surface water throughout the site and wedge pits at capacity. We have previously raised detailed technical questions with the Environment Agency concerning classification of wedge-pit water, absence of chemical monitoring, and long-term contaminant build-up in recycled IBA contact water. The

discharge pathway cannot be assessed in isolation from this wider site water management system.

2. Agricultural and Livestock Pathways – Snapshot Assessment and Ongoing Exposure Risk

The Multi-Agency Public-Health study excluded crop irrigation and livestock pathways from risk assessment based on the claim that such use does not occur. However, the pathways to human consumption via crops and livestock exist regardless of whether EA has recorded current use. The conclusion rests on a snapshot of use rather than on assessment of ongoing exposure risk.

The public health assessment concluded that King's Dyke water was not being used for crop irrigation at the time of the study, and site visits recorded only horses present. However, EA's own abstraction licensing records show licences issued for spray irrigation from Kings Dyke with volumes up to 91,100 cubic metres per irrigation season, and cattle were documented at water abstraction points in 2022-2023. Furthermore in 2023, EA's permit application EPR/BP3525PR/A001 stated that discharge to Kings Dyke would "provide a valuable resource for agricultural irrigation" with demand justifying expedited determination for spring/summer 2023. Now in 2026, the Multi-Agency Public-Health study says that Kings Dyke water "is not being used for crop irrigation. "xx`

The Multi-Agency Public-Health study was based on current operations and on land use and animals present at the time of the site visits. It therefore reflects conditions observed at a particular point in time rather than an assessment of how agricultural or livestock use may vary in practice. Small-scale agricultural abstraction for crops or livestock does not require EA licensing, so water use patterns can change without notification. Abstraction licences for spray irrigation from Kings Dyke remain in place, yet the pathway itself has been discounted. If that pathway is considered irrelevant, why are abstraction permits for spray irrigation issued, and why was agricultural need previously cited as a reason to accelerate determination of a discharge permit in 2023?

Similarly, correspondence notes that issues such as routine bathing were considered outside the scope of the Saxon Pit public-health work on the basis of the information then available. Residents have reported children swimming in warmer weather and youth groups using the water, illustrating how patterns of use can change in practice. Again, the Multi-Agency Public-Health study narrow scope only reflects conditions observed at the time rather than an evaluation of how exposure pathways may vary over time. Residents need to understand these limitations and be aware of the apparent contradictions with past experiences which is especially critical with applications pending to almost double the throughput of IBA and for a science park, which includes a public access to Saxon Pit via a walkway next to the IBA processing site.

3. Independent Review Finds Key Contamination Pathways Not Assessed and Testing Gaps

The Multi-Agency Public-Health study was presented as a risk assessment that "brings together all the available relevant data on the potential health impacts" of Saxon Pit operations. Given that source data and detailed methodology have not been published, Saxongate commissioned an independent peer review by Dr Andrew Rollinson, an expert researcher specialising in energy-from-waste technologies.

A key point he has raised is that incinerator bottom ash was not investigated as a contamination pathway despite being the primary resident concern and a substance known to contain hazardous constituents which can persist in the environment. He also noted that soil samples were taken south-east of the site despite prevailing south-westerly winds and that no chemical analysis was conducted on dust or lagoon water for IBA-derived contaminants.

The review also identified potential gaps in the testing. For example, the livestock pathway assessment tested for cadmium, which does not bioaccumulate in eggs.

Dr Rollinson also identified issues with water contamination findings and soil sampling methodology. The multi-agency public-health study reported "elevated concentrations of certain elements" in both the lagoon and Kings Dyke but did not disclose which elements or at what concentrations. Rollinson says he later learned this referred to a single element - mercury - raising questions about why the study used plural terminology and why the specific contaminant was not disclosed initially, particularly given that mercury is a known constituent of IBA and identifying the contamination source is essential for risk assessment.

In addition, the soil sampling used residential soil guideline values (200 mg/kg for lead) rather than allotments guidelines (80 mg/kg), despite the sampling sites being used for livestock and poultry rather than residential purposes. Using the more appropriate allotments benchmark, one lead sample (100 mg/kg) exceeded the acceptance value, but this exceedance was not discussed in the study.

4. IBA Facility, Greywater and Lagoon Pathways – Cross-Site Contamination Risk Not Assessed

The adjacent Johnsons IBA processing site shares immediate proximity and geological context with the lagoon. Press-published photographs show from February 2026:

- Substantial surface water throughout the site
- IBA stored outside designated bunded areas (CCC site visit 4 February 2026 confirmed IBA outside the Waste Reception Area, constituting a technical breach of Condition 25 of planning permission CCC/21/024/FUL). This is the second such breach within twelve months, following a similar incident in August 2025 during concrete pad crack repairs.
- Wedge pits at capacity with cloudy water consistent with IBA processing

In 2025, Cambridgeshire County Council issued a Planning Contravention Notice to EMWM for processing IBA-contaminated material in the open near the lagoon area without appropriate surface protection and drainage controls, material sourced from the adjacent IBA site. The Environment Agency required this activity to cease.

Dr Rollinson's technical review of the adjacent IBA facility (October 2025) found that wedge-pit water is recycled for dust suppression without chemical testing, creating what he described as a 'contaminated reservoir with no proposal to treat the water before re-use.' He further warned that 'constant looping of water without treatment will mean that potentially leachable contaminants will accumulate in the greywater and become highly concentrated.' International technical guidance under the Basel Convention states that water in contact with incinerator bottom ash contains salts, metals, suspended solids and organic contaminants, including PCDD/F (highly toxic, persistent organic pollutants), and should be managed as contaminated effluent.

No boundary monitoring exists between the two sites and no testing has been conducted for IBA-specific contaminants in lagoon water. The risk assessment does not address potential contaminant migration from adjacent IBA operations. IBA is known to contain heavy metals, persistent organic pollutants and PFAS, yet targeted testing for these contaminants was not carried out in lagoon water, dust samples or boundary soils

Request to Middle Level Commissioners from Saxongate Residents Group

Before granting discharge consent, we request MLC consider:

1. Whether cross-site contamination risk from adjacent IBA operations has been adequately assessed
2. Multi-Agency Public-Health study exclusion of agricultural and livestock pathways based on snapshot observation rather than ongoing risk assessment

3. Independent expert findings on methodology deficiencies
4. Absence of IBA-specific contaminant testing

The photographic and technical evidence demonstrates material concerns requiring transparent assessment. Despite these concerns the EA have granted a permit for Saxon Pit to officially discharge into King's Dyke, The Multi-Agency Public-Health study excluded IBA as a pathway risk, Breaches for sorting and handling IBA outside of the agreed area will may be excluded from any decisions and a planning application to almost double the amount of IBA within the same footprint remains active. Saxongate continues to push the message that absence of evidence of harm is not the same as an absence of harm. Saxongate notes that the Multi-Agency Public-Health study recommends regular engagement meetings, increased monitoring and the introduction of boundary dust monitoring. The details will be agreed through those meetings, which is a positive step forward. It gives residents a route to push for the evidence gaps identified above to be properly examined and addressed.

Photo Credit – CambsNews.co.uk

[Environment Agency urged to investigate incinerator ash storage breaches at Saxon Brickworks in Whittlesey - News for Peterborough and Cambridgeshire](#)

In other news the EA have created a new Website (engagement HQ) focused on Saxon Pit and Forterra. You can download information and register to receive EA updates from there = [Whittlesey Quarry \(Saxon Pit\) | Engage Environment Agency](#)

The usual small print and a help request: -

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