

Hixon Parish Council has been consulted on a proposed Composting Treatment Facility on Hixon Airfield.

The planning application has been submitted to Staffordshire County Council and the application number is S.09/07/4009. It proposes to compost 20,000 tonnes of waste food (from domestic refuse bins and possibly commercial outlets) to create compost.

Hixon Parish Council has considered the application and has objected to the application. Please see below Hixon Parish Council's letter of objection to the scheme.

Staffordshire County Council
Development Services Directorate
Development & Waste Management Unit
Riverway
Stafford
ST16 3TJ

For the attention of Mr. David Bray, Planning Officer

Dear Sir

Ref: Application No S.09/07/4009 W Composting Treatment Facility at Hixon.

Hixon Parish Council has considered the above application and wishes to record its objection to application.

Whilst Hixon Council is supportive of the need to recycle more and more waste products, there is an even greater requirement for the Council to safeguard and protect the local community from developments that will harm or diminish the quality of life they currently enjoy.

It is certain the impact of his proposal, if it were to be approved, would cause significant detrimental harm to residents and visitors to households closest to the site, employees of businesses on Hixon Airfield Estate, walkers using the Public Footpath nearby and road users.

The proposed facility has the potential to cause odours to be sensed at virtually every property within a range of 2,000m from the site, effecting properties in Hixon and in the neighbouring parishes of Stowe-by-Chartley, Weston with Gayton and Tixall with Ingestre.

Hixon Parish Council objects to the scheme for the following reasons:

- It is outside the Recognised Industrial Estate Boundary for Hixon Airfield
- Any development outside the RIEB would create an undesirable precedent
- The buildings and externally stored materials would be highly visible from New Road and from Stowe Lane and would be intrusive in open countryside.
- The modelling for the predicted Odour Impact Assessment is fundamentally flawed.
- Residents at properties within 1,000m would experience odours, some towards the *moderately offensive* level.
- The seven day per week nature of the operation would jeopardise the quiet and peaceful weekends that Hixon residents could reasonably expect to enjoy.

In addition, the Council wishes to comment on the following documents submitted with the application.

Report on Odour Impact Assessment prepared by ADAS

This document relies heavily on comparing the proposed site in Hixon with another waste composting site in Huntingdon. It also draws on Meteorology history at Shawbury in Shropshire, some 45km away, as a comparable model for weather predictions at Hixon. Neither of these sites accurately reflect the unique characteristics of the Hixon site.

The site at Huntingdon is some 800m from the nearest residential property, save for the site manager's house. The nearest residential property to the proposed facility in Hixon is only 569m away. More importantly, the A1 trunk road separates the waste facility at Huntingdon from the nearest properties in the village of Brampton. The A1 road at this point is of almost motorway standard and carries a huge amount of traffic 24 hours a day, seven days a week. The impact of any odours caused by the Huntingdon facility is negated by the smell of vehicle emissions on the A1. The Huntingdon site does not, therefore, provide an accurate model to compare against the proposed facility in Hixon.

On page 8 of the ADAS report, point 4.3 the author speculates that "*As this is a rural area, the local population may reasonably be expected to be relatively tolerant of odours of an agricultural nature, similar to the earthy and composting odours expected from the proposed facility and consequently there is some justification to relax this target (Environment Agency guidelines on offensive smells) in this case.*"

The author is wrong in speculating who would find what smell offensive. The author is clearly conceding there will be offensive odours which will have a damaging and detrimental effect on the lives of those people affected. There is no case for relaxing targets, but there is every case to refuse the application on the grounds of material harm to the community caused by odour release.

The ADAS report then turns to the question of Meteorology. The report concedes there is no 5 year sequential for Hixon and proposes Shawbury in Shropshire as a comparable model to Hixon. On page 10 Point 5.2 Meteorology, the first paragraph is littered with caveats about the actual similarity between Shawbury and Hixon.

- *Shawbury has a wind direction, which in our opinion, is likely to be similar to Hixonsimilar altitude.....in our opinion provides the best available representation*

Page 4 of the ADAS report acknowledges that Hixon Airfield is in a valley (the Trent Valley) and that there is rising ground to both the east and south-west. The ground rises between 40m and 55m above the application site, creating a unique micro climate that cannot be compared to Shawbury.

Indeed, such is the unique nature of the micro climate in the Trent Valley, there are salt marshes, designated as a Site of Special Scientific Interest (SSSI) at Pasturefields/Shirleywich adjacent to the A51, approximately 600m from the proposed facility. There are many days when, especially in autumn and winter, the damp atmosphere in the Trent Valley causes a fog-like mist that envelops the area for much of the day. On such occasions, the odours are unlikely to disperse in accordance with any computer model.

No computer modelling can accurately predict the actual dispersal of odours and Hixon Parish Council contests the validity of using Shawbury as a comparable site.

Under the heading *Conclusions and Recommendations* on page 17 of the ADAS report, the author concedes there will be "Odour levels (are) predicted to be fairly high in the immediate vicinity of the proposed composting building (50? ouE/m³ against a 'most offensive EA level of 6ouE/m³) and along a short section of the public footpath.

It is not acceptable that a historic public footpath should be compromised by such high levels of offensive odours.

Also on page 17, the ADAS report predicts the highest concentration of odours, some predicted to be 'moderately offensive,' will be detected by residents and visitors to properties near the former level crossing in New Road and in Shirleywich Farm.

Residents at these properties deserve the right to be protected from a development that will blight their lives and properties.

Noise Consideration Report prepared by Recogen Ltd.

This report also alludes to the Huntingdon waste facility (the reference facility) as the source of data. By virtue of the noise of traffic on the A1 trunk road, it is unlikely that noise from the Huntingdon facility is an issue locally. In the wider community the issue of noise from the proposed facility in Hixon is also unlikely to be a problem.

However, the effect of very high noise levels close to the buildings will have an impact on walkers using the nearby public footpath. The combination of odours and high noise levels is very likely to render the public footpath as unusable, which would be a significant loss of an amenity that many people currently enjoy.

Highway Report, prepared by Richard Parker Consultancy

This report focuses on the suitability and capability of the existing road network to accommodate the increase in vehicle movements that would be generated by the proposed development. In particular the report looks at the A51 junction and uses statistical analysis to demonstrate the proposed facility would not 'overload' the junction.

While this may be true, the real issue is the additional traffic at weekends and the visual impact of vehicles moving across open countryside to the site. Additionally, there is no statement or commitment to restrict access to the proposed site from the 'lower' Airfield Estate entrance. It is totally unacceptable for up to sixty heavy vehicle movements per day to use the main Airfield Estate access gate in Hixon village. Apart from the noise and vibration caused by these vehicles as they travel on New Road, it is quite likely the loads they carry will have offensive smells and will cause significant distress affecting many properties near the centre of Hixon village.

Environmental Quality Assessments prepared by Recogen Ltd.

Much of this report summarises the findings of the Odours and Noise reports covered above. It again uses the Huntingdon waste facility and Shawbury meteorological file records as references. The arguments set out above apply to this report.

Bio aerosols Risk Assessment prepared Recogen Ltd

This report references Huntingdon and Shawbury as comparable sites. For the reasons set out above, Hixon Parish Council believes these two reference sites are inappropriate comparisons and therefore the assumptions and conclusions in the report are invalid.

Design and Access Statement, prepared by Andrew Pym

The report concedes the buildings are large and will be visible from some *long distance vantage points*. The major planning policy issue is that the proposed facility is outside the Recognised Industrial Estate Boundary and is effectively in open countryside. The adopted Stafford Borough Council 2001 (page 114 point 4.2.6) acknowledges the importance of protecting Recognised Industrial Estate Boundaries "*it is considered important to define these areas not only for the reasons given but also to restrict their physical expansion thereby protecting the surrounding open countryside.*"

The proposed development is clearly outside the RIEB and approval would set an undesirable precedent at Hixon Airfield. The significant number of daily vehicle movements across open countryside would also add to the visual impact.

Page 2 point 17 of this report states there is an hourly bus service to Stafford that employees could use. There is no such service on Sundays.

Planning Statement prepared by Andrew Pym

In general, this report summarises the other consultant-prepared reports and the same arguments against the proposed development apply.

The Planning Statement again references the waste composting site at Huntingdon. However, as has been stated above, the Huntingdon site is over 200m further away from the nearest residential property (800m+) than the proposed facility in Hixon (only 569m). The Huntingdon site is separated from housing by the A1 trunk road and it is accessed directly from the A14 trunk road. Its location bears no comparison to the proposed site in Hixon.

Point 26 states that Hixon village lies due east of the proposed development site. Consequently the prevailing westerly winds will carry odours and noise much further towards the heart of the village and for significant periods of time throughout the year.

Point 63 refers to hours of working *should be* 07.00 to 18.00 every day. Is this a commitment or suggestion? Weekend working is unacceptable so close to residential properties.

Point 70 External lighting. The necessity for external lighting during short daylight days will have a significant visual impact that will be detrimental to the area.

The Planning Statement also refers to the National Waste Strategy 2007 and seeks to underpin the case for approval by regurgitating Government ambitions and targets. While the objectives of NWS 2007 need to be met, they should not override current planning policies or be used to justify and drive through developments that will have significant negative impact on the local environment.

At point 91, the report states that Staffordshire County Council *intends to secure composting capacity of 83,000 tonnes (per annum) in 2009/2010*. The proposed facility at Hixon is claimed to be capable of processing 20,000 tonnes per annum. Given the obvious immediacy of the County Council's target, it would not be unreasonable to expect there to be considerable pressure to expand the capacity of any composting facility at Hixon very quickly. Such expansion would render invalid all reports on odours, noise, traffic movements and environmental impact submitted with the current application.

Extended Phase 1 Ecology Survey prepared by Countryside Consultants Ltd

Due to the very short consultation period, it has not been possible to adequately read and comment on this report.

Conclusion of Hixon Parish Council

The Council reinforces its objection to the proposed composting facility at Hixon for the reasons set out on page 1 and comments above relating to other documents.

Cambridgeshire County Council has developed a waste composting facility at Huntingdon that, by virtue of its discreet location alongside the A14 trunk road, does not have any adverse visual impact. In addition, the distance and separation (by the A1 trunk road) of the facility from housing means it does not impact on residents in Brampton village.

The proposed waste composting facility in Hixon does not have similar redeeming characteristics. The proposed site would be visually intrusive and its close proximity to housing would have a detrimental impact on the quality of life residents currently enjoy.

Meeting recycling targets should not be at the expense of a reduction in quality of life for people and communities. The proposal should be rejected.

Yours faithfully

Mrs. Catherine Gill
Clerk to Hixon Parish Council