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

**For the attention of Mr. David Bray, Planning Officer**

**Ref: Application No S.09/16/4009 Waste Composting Treatment Facility at Hixon.**

Dear Sir

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

**The Council objects to the applications on the following grounds:**

- The proposed waste treatment process is very low quality technology unbecoming of Staffordshire.
- It does not generate recoverable green energy against stated aims and objectives of the EU, British Government and Staffs County Council
- Question whether process is nothing more than landfill
- The potential for smells and odours
- Dust
- Potential health risks and pathogens
- Vehicle movements
- Access issues
- The proposed building is three times the size required to process 20,000 tonnes per annum
- The proposed amount of waste to be processed would appear to be more than the proposed area of concrete hardstanding would accommodate (where will it be stored prior to disposal?)
- Vermin
- Scavenging Birds
- Litter
- Impact on Public Footpath
- Visual Intrusion in open countryside
- Impact on current eco-structure and wildlife balance
- Where is the justification for the choice of the site?
- Where is the evidence for alternative site considerations?
- Reference Site Huntingdon
- Reference Site Shawbury
- Does the applicant Company exist?

- Stafford Borough Council issues:
- Site is outside Stafford Borough Council's Recognised Industrial Estate Boundary (see adopted 2001 Local Plan pages 114-116)
- Potential 'nuisance' industrial sites are covered by the Local Plan. On page 116 Policy EMP4. It specifically refers to alongside railway frontages where. "*unsightly activities are difficult to screen*"

In more detail:

**1 The proposed waste treatment process is very low quality technology unbecoming of Staffordshire.**

- 1.1 The proposed waste treatment method is the least efficient method of processing waste food and green waste materials.
- 1.2 The European Union, British Government and Staffordshire County Council all have stated aims to recover green energy as a by-product of waste treatment.
- 1.3 The application states the process as In-Building not In-Vessel.
- 1.4 After a fairly basic process to induce composting, the material is taken outdoors to continue composting in the open.
- 1.5 It can take up to a further 3 months to finally 'compost' and needs to be turned over regularly by heavy machinery.
- 1.6 Finally, it is spread over the ground as a low grade fertiliser. In other words, it is disposed over the ground. The outcome of the process is therefore little different to landfill.
- 1.7 There is no recoverable green energy from the in-building composting process.
- 1.8 The EU lists a hierarchy of waste management and treatment: a) prevention b) preparing for re-use c) recycling d) other recovery; energy recovery e) disposal.
- 1.9 The EU encourages member states to move waste management UP the hierarchy. This application would keep Staffordshire rooted to the lowest rung.
- 1.10 On 13<sup>th</sup> October 2009, the Secretary of State for Communities & Local Government (John Denham) said "we are missing a major opportunity to generate heat and energy and turn waste into money."
- 1.11 Staffordshire County Council also prefers waste treatment processes that deliver **clean energy and energy generation** (press release re Four Ashes site).
- 1.12 Staffordshire is marketed as the Creative County. The process proposed in the application is the least creative waste management alternative and is unbecoming of Staffordshire.

**2 Question whether process is industrial or not**

- 2.1 The insertion of the word 'composting' in the application documents is the only reason why Staffordshire County Council Planning Committee, rather than Stafford Borough Council Development Control Committee, is dealing with the application.
- 2.2 Notwithstanding the terminology, the process is on an industrial scale and as such should also be considered against the policies defined in Stafford Borough Council adopted Local Plan 2001.

**3 The potential for smells and odours**

- 3.1 The applicants concede the process will create odours and emissions.
- 3.2 The proposed site is less than 250m of residents living at Spring Farm – this is contrary to the requirements of the Environment Agency.
- 3.3 Residents at properties within 1,000 m of the site would experience odours *some towards the moderately offensive level*.
- 3.4 A 1,000m zone around the proposed site would encompass properties in residential properties in Hixon, Shirleywich and Amerton.
- 3.5 The odours will be "fairly high in the immediate vicinity of the building.
- 3.6 Further, the odours will be "most offensive along a section of the public footpath."
- 3.7 The author of the ADAS report (point 4.3) attempts to play down the effect of odour emissions by saying "*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.*"
- 3.7 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.

- 3.8 The odour impact report relies heavily on another site 45km from Hixon (Shawbury in Shropshire) to model the dispersal of odours.
- 3.9 This is clearly inappropriate as all sites have unique micro climates.
- 3.10 The application site lies in the Trent Valley where the unique climate has created salt marshes some 600m from the site. The salt marshes are designated as a Site of Special Scientific Interest.
- 3.11 There are many days, especially during autumn and winter when the damp atmosphere in the Trent Valley cause a fog-like mist that can envelop the area for much of the day. On such days the odours are unlikely to disperse in accordance with any computer model.
- 3.12 Peter Sykes, head of public protection at the University of Wales Institute in Cardiff said the effects of waste composting site “depends on how the waste is being turned, the weather and the landscape itself.”
- 3.13 Clearly the Hixon site cannot be modelled on any other site.
- 3.14 Hixon lies east of the application site (ie) downwind of the prevailing westerly winds. These winds have the potential carry odours and emissions into the very heart of the village.

#### **4. Dust**

- 4.1 Dust from the proposed facility will be a major issue during dry periods.
- 4.2 Dust will be generated by HGV and other vehicle movements across open countryside.
- 4.3 Dust will also be a by-product of the external composting process which requires the material to be turned over at frequent intervals.
- 4.4 Damping down the material is an unreliable and uncontrolled method of dust prevention.
- 4.5 To induce the composting process, temperatures up to 150F need to be achieved. Spraying water on would defeat the objective and in any case,
- 4.6 Hixon lies east of the application site (ie) downwind of the prevailing westerly winds. These winds have the potential to carry dust particles into the very heart of the village.

#### **5. Potential health risks**

- 5.1 Newspaper reports (example Daily Mail June 29 2009) say that research has shown that food and waste treatment sites could harm the health of people living nearby.
- 5.2 Rats and flies are a major problem and spread disease.
- 5.3 Compost contains bacteria, spores and fungi that can become airborne in emissions known as bioaerosols which are potentially harmful to humans.
- 5.4 The main health problems are respiratory infections.
- 5.5 66 residents living near a waste composting site in Wolverhampton complained that the site had harmed the health of one or more members of their family.
- 5.6 Research also revealed that only 8 out of 44 waste composting sites had produced adequate risk assessments.
- 5.7 The whole process is open to abuse and shortcuts.

#### **6. The Environment Agency Review**

- 6.1 The Environment Agency concluded a consultation with the waste composting industry on October 13<sup>th</sup> 2009.
- 6.2 The outcome of that consultation and the review and possible change to the EA Guide lines has yet to be determined.
- 6.3 No decisions should be made until any new guidelines are in place.

#### **7. Vehicle movements and Access Issues**

- 7.1 Up to 80 vehicles movements (most of them HGVs) will occur each day.
- 7.2 The site is proposed to operate 7 days per week.
- 7.3 The vehicles will pass over an area of open countryside and will generate both noise and dust pollution.
- 7.4 While Hixon village is (notionally) protected by a 7.5 ton weight limit, this exclusion is frequently breached by HGV drivers who either a) unknowingly drive into Hixon and/or Stowe-by-Chartley or b) intentionally do so as a short cut between from the A51 and A518.
- 7.5 The application site will be accessed from the existing gated entrance off New Road.

- 7.6 However, this entrance is not available after 6.00pm on weekdays and not at all on Saturdays and Sundays
- 7.7 The application is therefore invalid in that the site can not be accessed along the defined route on Saturdays and Sundays.
- 7.8 The alternative would be to bring the HGVs to the entrance within the village of Hixon on Saturdays and Sundays.
- 7.9 This would be detrimental to the well being of residents who have a right to enjoy quite weekends.

**8. Are the proposed vehicle movement numbers the tip of the iceberg?**

- 8.1 The proposed plant is forecast to 'treat' 20,000 tonnes of waste each year.
- 8.2 The two primary treatment building measure 80m x 24 and 60m x 24m and are 8.3m high
- 8.3 The total floor area is 3,360 sq m.
- 8.4 However, a 'typical' composting plant capable of treating 25,000 tonnes per annum can be contained in a building measuring 25m x 30m x 4 to 5m high.
- 8.5 This has an area of 750 sq m.
- 8.6 The proposed site at Hixon is therefore nearly six times larger than is needed to treat 20,000 tonnes.
- 8.7 This 'anomaly' has significant implications on what is really being proposed and the impact and increase in volume would have.
- 8.8 For example, the vehicle movements (by interpolation) could increase to over 400 per day. This would invalidate the findings of the Highway Statement prepared by The Richard Parker Consultancy.
- 8.9 Staffs County Council Highways have revealed they are unlikely to give approval to any development that would increase traffic flows at the New Road/A51 junction by more than 10%.
- 8.10 Perhaps the low forecast level of waste being treated is convenient to avoid this problem?

**9. The external storage area**

- 9.1 The proposed annual volume of waste to be treated is much greater than the area of concrete hardstanding proposed to complete the external composting process.
- 9.2 Where will the excess be stored before the time of year when it can be ploughed in?
- 9.3 There is no indication of how high the externally stored materials will be.
- 9.4 A view of the site at Huntingdon in Cambridgeshire showed the heaps up approximately 7m high.
- 9.5 Such heaps will have a significant visual impact not least to walkers and passengers on trains passing nearby.

**10. Vermin and Scavenging Birds**

- 10.1 It is inevitable that vermin and scavenging birds of all kinds will be attracted to the site, yet no mention is made of this fact in any of the application documents.
- 10.2 The vermin and scavenging birds will deter walkers from using the public footpath (No 34) which has been regularly used for at least 50 years.
- 10.3 The vermin and scavenging birds will have a significant detrimental impact on the existing eco structure and wildlife balance.
- 10.4 A large population of skylarks will almost certainly be decimated (see attached report).

**11. Public Footpath No 34**

- 11.1 This footpath has been used by regularly by walkers for over 50 years.
- 11.2 Staffordshire Council Rights and Ways has a duty to retain public footpaths.
- 11.3 The movement of HGVs along the line of the footpath would effectively make it unusable.
- 11.4 The close proximity of the footpath to the proposed building and the noise and smell emissions would further deter walkers.
- 11.5 Walkers have a right to expect the footpath is accessible and usable.
- 11.6 No commercial interests should have precedence over the rights of the walkers.

**12. Visual Intrusion in open countryside**

- 12.1 The visual impact in the area will be significant.
- 12.2 The building extends to nearly 100m in length and 48m wide reaching a height of 15m.
- 12.3 Such a building will be dominant in an otherwise flat landscape.

- 12.4 The buildings will be easily viewed from New Road, Stowe Lane, the A51 at Shirleywich and the A518 at Amerton.
- 12.5 Policies require that waste treatment sites should not adversely affect the countryside or places of special interest.

**13. Stafford Borough Council Planning Policies**

- 13.1 Stafford Borough Council Local Plan 2001 has strict guidelines on industrial estate defined within Recognised Industrial Estate Boundaries as *“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.”*
- 13.2 The development site is clearly well outside the RIEB for Hixon Airfield Industrial Estate and so contrary to SBC policy EMP3.
- 13.3 The argument that the proposed waste treatment facility should be sited outside the RIEB because of the odour and noise emissions is facile.
- 13.4 Further, SBC Policy EMP4 refers to potential ‘nuisance’ sites and their impact on rail frontages, where; *“unsightly activities are difficult to screen.”*

**14 Other existing and potential sites**

- 14.1 There is a significant amount of waste treatment capacity either in place or approved that will more than meet Staffordshire County Councils recycling targets over the next ten years.
- 14.2 Sneyd Hill in Burslem has the capacity to treat over 300,000 tonnes.
- 14.3 Huntingdon Cannock 45,000 tonnes.
- 14.4 Four Ashes near Penkridge.
- 14.5 Poplars Cannock 80,000 tonnes.
- 14.6 The application states that no other sites have been put forward as justification for approval
- 14.7 However, there is no evidence to suggest that any other sites have actively been sought or considered.
- 14.8 In fact the applicant has a Waste Transfer Licence for the property at Grindley House Farm at Grindley near Uttoxeter.
- 14.9 This site is significantly removed from neighbouring properties.
- 14.10 It has direct access off the A518.
- 14.11 The visual impact would be much less than the proposed site at Hixon.
- 14.12 Hixon Parish Council proposes Grindley House Farm as an alternative site for a waste composting facility as detailed in the S.09/16/4009 W application documents.

For all the above reasons and many more that others will make, Hixon Parish Council objects to the proposed waste composting scheme at Hixon.

Yours faithfully

Catherine Gill  
Clerk to Hixon Parish Council