

SOUTH CAMBRIDGESHIRE DISTRICT COUNCIL

REPORT TO: Planning Committee 7 February 2018
AUTHOR/S: Joint Director for Planning and Economic Development for
Cambridge and South Cambridgeshire

Application Number: S/3372/17/CW (Application submitted to Cambridgeshire County Council)

Parish(es): Landbeach

Proposal: Construction and development of a Waste Recovery Facility

Site address: Levitt's Field, Waterbeach Waste Management Park, Ely Road, Waterbeach, Cambridge, CB25 9PQ

Applicant(s): AmeyCespa (East) Limited

Recommendation: The Committee is requested to approve the consultation response to Cambridgeshire County Council

Key material considerations: Impacts on landscape, local character, heritage, natural environment, human health, transport and sustainable waste objectives

Committee Site Visit: No

Departure Application: No

Presenting Officer: Andrew Winter, Principal Planning Officer

Application brought to Committee because: Due to large scale of development and its implications on the local area

Date by which decision due: 10 February 2018

SCDC is a consultee on the application

National Guidance

1. National Planning Policy Framework 2012 (NPPF)
Planning Practice Guidance
2. **Development Plan Policies**
The extent to which any of the following policies are out of date and the weight to be attached to them is addressed later in the report.

3. **Cambridgeshire and Peterborough Minerals and Waste Development Plan Core Strategy Development Plan Document (CSDPD) (2011)**
4. **Cambridgeshire and Peterborough Site Specific Proposals Development Plan Document (SSDPD) (2012)**
5. **South Cambridgeshire LDF Development Control Policies DPD, 2007:**
 - DP/1 Sustainable Development
 - DP/2 Design of New Development
 - DP/3 Development Criteria
 - DP/4 Infrastructure and New Development
 - DP/7 Development Frameworks
 - NE/3 Renewable Energy Technologies in New Development
 - NE/6 Biodiversity
 - NE/8 Groundwater
 - NE/9 Water and Drainage Infrastructure
 - NE/11 Flood Risk
 - NE/12 Water Conservation
 - NE/14 Lighting Proposals
 - NE/15 Noise Pollution
 - CH/4 Development within the Curtilage or Setting of Listed Buildings
 - TR/2 Car and Cycle Parking Standards
6. **South Cambridgeshire LDF Supplementary Planning Documents (SPD):**
 - Trees & Development Sites SPD - Adopted January 2009
 - Landscape in New Developments SPD - Adopted March 2010
 - Biodiversity SPD - Adopted July 2009
 - District Design Guide SPD - Adopted March 2010
7. **South Cambridgeshire Local Plan Submission - March 2014**
 - S/1 Vision
 - S/2 Objectives of the Local Plan
 - S/3 Presumption in Favour of Sustainable Development
 - S/5 Provision of New Jobs and Homes
 - S/6 The Development Strategy to 2031
 - S/7 Development Frameworks
 - HQ/1 Design Principles
 - NH/4 Biodiversity
 - CC/1 Mitigation and Adaptation to Climate Change
 - CC/3 Renewable and Low Carbon Energy in New Developments
 - CC/4 Sustainable Design and Construction
 - CC/6 Construction Methods
 - CC/7 Water Quality
 - CC/8 Sustainable Drainage Systems
 - CC/9 Managing Flood Risk
 - SC/10 Lighting Proposals
 - SC/11 Noise Pollution
 - TI/3 Parking Provision
 - TI/8 Infrastructure and New Developments

Location

8. The site comprises a grass field at Waterbeach Waste Management Park to the west of the Ely Road (A10) and Denny Abbey. The site lies approximately 3km to the northwest of Waterbeach village and 1.5km to the south of Chittering. The site is

9. bounded by Ely Road to the east, a Mechanical Biological Treatment Facility to the northeast, an area of landfill to the northwest and undeveloped land to the southwest. Denny Croft and Denny Abbey Cottages are located to the south-east and east of the application site.
10. Denny Abbey is located approximately 150m to the east of the site and includes the scheduled medieval earthwork remains (including the church and the refectory) and a Grade I medieval church and Grade I refectory. The post-medieval barn to the north of Denny Abbey is Grade II Listed. Denny Abbey is open to the public and houses the Farmland Museum.

History

11. Waterbeach Waste Management Park (WWMP) delivers a range of waste services across its 162 Ha including recycling, composting, landfill and mechanical biological treatment.
12. The wider WWMP has been operational as a minerals and waste site since the 1960s. Subsequent planning permissions were granted for landfilling and then more recently for the development of the Mechanical Biological Treatment & Materials Recycling Facilities.

Background to Proposal – Need & Alternative Sites

13. The applicant proposes to develop and operate a waste recovery facility, comprising an Energy from Waste (EfW) facility on a selected plot of 6.23Ha, as shown on the submitted plans in **Appendix 1**. The main building includes:
 - waste reception hall;
 - waste bunker;
 - boiler hall and demineralisation plant;
 - turbine hall;
 - flue gas treatment (FGT) facility;
 - Air Pollution Control (APC) reagent silos and APC residue silos; and
 - education/visitor and staff facilities.
14. The red line boundary of the application site includes provision of space alongside the A10 for heat pipes to connect to the proposed new town at Waterbeach (Policy SS/5 of the draft Local Plan). This follows the draft Local Plan modifications to Policy SS/5 which states that 'The new town will incorporate and deliver sustainable design and construction standards established by the Local Plan. These measures could include combined heat and power provided from the adjacent Waterbeach Waste Management Park.'
15. The proposed building would be 141m long, 55-91m in width, up to 41.7m in height with a chimney stack of 4.5m diameter and 80m height. The proposed facility would complement the existing waste processes on site and would be used to create energy in the form of electricity and potentially heat. Of the waste that would be accepted to the proposed facility, circa 184,000tpa would be output direct from the existing on-site processing facilities. The remaining circa 66,000tpa would be sourced directly from third parties. Approximately 5% of the waste accepted at the facility would then require final disposal to landfill.
16. The Cambridgeshire and Peterborough Site Specific Proposals Development Plan (2012) allocates three sites for waste recycling and recovery facilities including EfW.

The proposed EfW at Waterbeach is one of these three and the other two are located in Whittlesey at Kings Dyke Brickpits, (Site Ref SSP W1O) and Saxon Brickpits (Site Ref SSP W1W). Whittlesey is located on the northern periphery of the county less than 2.5km from the border with Peterborough.

17. The applicant explains that Waterbeach is in a preferable location to the two other local plan alternatives, as it is geographically more central to the county and close to the main sources of locally derived waste. The need and justification for the EfW facility in relation to the wider waste management area and waste plan objectives is not a matter for the District Council to comment on and will be assessed by the County Council as the determining authority.

The proposed full planning application is submitted to Cambridgeshire County Council as the Minerals and Waste Authority and the development constitutes EIA development.

Main Issues

18. This report considers the Council's response to the formal consultation request received from Cambridgeshire County Council on the proposed EfW facility. The statutory public consultation period has been extended by Cambridgeshire County Council until 7th February to enable time for South Cambridgeshire's Planning Committee to consider the proposals. Separate consultation has been carried out with local residents and parish councils by Cambridgeshire County Council and representations will be available to view on their website. It is envisaged that Cambridgeshire County Council will take the planning application to its Planning Committee towards the middle of 2018.
19. This report summarises technical consultee comments and sets out recommendations on the acceptability or otherwise of the development proposals with regard to local and national policy.

Table 1 – Summary of Key Comments

20.	Consultee	Key Comments
	SCDC Historic Buildings Advisor	Objection. The proposed EfW facility would cause great harm to multiple designated built heritage assets, severely impact the setting and significance of Denny Abbey (Grade I), and the associated buildings comprising the Refectory (Grade I), barn (Grade II), and gate piers (Grade II). The setting of Causeway Farmhouse (Grade II) will be harmed. The ES further identifies 'minor' harm to the setting of Ely Cathedral (Cathedral of the Holy Trinity – Grade I), along with Landbeach Conservation Area and Cottenham Conservation Area.
21.	Historic England	Objection. The landscape setting of Denny Abbey contributes to its heritage values and that the proposed development would be a dominant and alien structure in key views from the site, which would result in very serious harm to its significance. Historic England recognises that the site has been allocated in the local plan for uses which could include energy from waste and that such facilities provide public benefits. However, in this case the harm is very serious. We urge that consideration should be given to alternative development on the allocated site, which would not

		result in a high degree of harm to the significance of the designated heritage asset.
22.	Natural England	No objection. Based on the plans submitted, Natural England considers that the proposed development will not have significant adverse impacts on Wicken Fen Special Area of Conservation (SAC) and Ramsar site and has no objection.
23.	Environment Agency	No objection to principle of development subject to conditions. The facility will need to apply for a bespoke Environmental Permit.
24.	SCDC Environmental Health Officer	Noise & Vibration – No objection to principle of development subject to conditions and an Environmental Permit. Lighting – The Waterbeach Waste Recovery Facility Lighting Assessment prepared by Strenger, dated December 2017 adequately covers the design of the site lighting from a nuisance point of view. Should significant adverse impacts become apparent from obtrusive artificial lighting once constructed, the addition of shielding or reorientation of luminaires can be carried out. Air Quality – Comments awaited Land Contamination – No objections subject to conditions.
25.	Cambridge Airport	No objection.
26.	SCDC landscape officer	The proposed development would introduce a highly visible and significant industrial feature into the landscape. Locally this will be completely at odds with the detailed and high quality landscape around Denny Abby and to the future landscapes to the south and east. Landscape and visual effects to local these local landscapes and receptors will be significant and adverse. The proposed development would be highly visible in a tranquil and rural landscape containing many sensitive visual receptors. Moderate to large significant adverse landscape and visual effects would result in many locations. Due to the scale of the proposed development it would be difficult to adequately mitigate against the adverse landscape and visual effects and reduce them to levels that will become acceptable, particularly in the context of the local, detailed and historic landscapes. The development and its potential landscape and visual effects to the gateway and approaches to Cambridge, Waterbeach and Denny Abby have not been assessed in addition to the night time effects of the development.
27.	SCDC ecology officer	Further information and clarity required on: reptile surveys, water vole surveys, Beach Ditch County Wildlife Site and landscape/ecological mitigation scheme

Landscape and Local Character Impact

28. The proposed development would introduce a large scale new building, with a tall emissions stack. As such, it would potentially be visible over a wide area although the most significant visual impacts would be localised – particularly from viewpoints to the west and south. The Environmental Statement highlights three viewpoints to the west (Viewpoints 1, 17 and 20), where significant adverse visual effects would occur. The proposal would also be highly visible from the proposed new town at Waterbeach Airfield and Baracks (Policy SS/5 of the SCDC draft Local Plan).
29. Despite the mitigation put forward by the applicant, the proposal would have significant and adverse visual impact on the local character and surrounding countryside due to its prominence, large scale and industrial appearance. Existing buildings on the site have a much lower height in comparison and are relatively inconspicuous due to their design/form and the extent of existing mature landscaping.
30. Additional visual harm would result at night time from potential external lighting, which would inevitably be required for the proposal's 24 hour, 7 day per week operation. Existing light sources in the vicinity of the site include street lighting on the A10 roundabout at the site entrance, lighting at the existing waste management park itself, lighting at Cambridge Research Park, and lighting from traffic along the A10. However, the submitted Environmental Statement does not provide sufficient information to assess night-time lighting impacts from the proposal and relies upon mitigation from surrounding buildings, landform and vegetation and the submission of a sensitively designed lighting scheme.
31. Consequently, the proposal would have a serious adverse visual impact on the local character, significantly increasing the impact of built development on the surrounding area contrary to Policies DP/2 and DP/3 of the South Cambridgeshire Development Control Policies DPD, 2007. It also has the potential for adverse visual impacts on the surrounding landscape from new lighting proposals. The Environmental Statement has not adequately assessed night-time lighting impact and the applicant should be required to submit further information under regulation 25 of the Town and Country Planning (EIA) Regulations 2017 to enable a full assessment of landscape and visual impacts.

Heritage Impact

32. In the submitted 'photomontage viewpoint 17', and 'photomontage viewpoint 20' (see **Appendix 2** of this report), the 'Existing View' clearly shows the surprisingly low visual impact the existing structures at the waste management park have on the setting of Denny Abbey; they do not distract from or dominate the Abbey site. The existing views clearly demonstrate their neutral impact on the setting and ability to appreciate the Abbey site. The same cannot be said about the proposed waste facility. The bulk of the building stands around 40m high; the chimney will stand 80m above the ground. The width of the elevation facing Denny Abbey is up to 90m across.
33. The visual impact of this large, industrial building would also be accompanied by operational impacts such as noise and lighting. The facility would be continuously operational, hence a requirement for lighting at night. Paragraph 5.4.50 states that "full cut off luminaires or other methods' would be used to minimise light spillage but this is not clarified or expanded upon, and the impact of light on Denny Abbey has not formed part of the heritage assessment. Given the uncertainty and the lack of assessment the impact of this on the setting of Denny Abbey remains a significant concern.

34. The negative impact of the proposal on the setting of the heritage assets at Denny Abbey is very high. In NPPF terms, if the impact on the significance of the assets in this instance is not found to meet the high bar of substantial harm, it must be assessed at the highest level of 'less than substantial' harm. The Denny Abbey site is still legible as an elevated landmark, isolated and rural in character. As identified within the Environmental Statement, it remains appreciable as an isolated fen island which is a fundamental element of its significance; now drained, the agricultural surroundings mark a later, yet still significant, stage of the evolution of the site.
35. The proposed waste facility would be dominant in views from Denny Abbey and the surrounding countryside. With the EfW facility c.150m from the western edge of the Denny Abbey site the Abbey would no longer be the dominant feature within its own setting.
36. The Denny Abbey site is exceptional and its significance multifaceted, but its setting is a fundamental contributor to that significance including the significance of each listed building. The sheer size of the EfW facility, and its proximity and harm to setting of Denny Abbey would be contrary to Policy CH/4. As paragraph 133 of the NPPF states: "Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal." Officers are of the view that the proposal is at the upper limit of 'less than substantial harm' and would cause serious harm to the setting of Denny Abbey's setting as highlighted by Historic England. Consequently, the level of public benefit would need to be very high to outweigh such harm.

Environmental, Human Health and Ecological Impacts

37. The comments of the Environment Agency and Local Lead Flood Authority do not raise any objections to the principle of the development subject to recommended planning conditions and an environmental permit.
38. The nearest residential properties are Denny Croft and Denny Abbey Cottages to the south-east and east of the application site. The proposed building reduces in height towards these properties at around 11.7m and would be separated from the south-eastern boundary of the site by a distance of approximately 130m. The submitted Environmental Statement includes assessments on noise impact, air quality, land contamination and human health. The environmental health officer concludes no adverse noise, vibration, lighting or land contamination impacts subject to conditions.

Separate comments on air quality will be updated to members.

39. In terms of ecology:
 - a) Reptiles – a reasonable avoidance strategy will need to be put in place before and during the construction phase to safeguard possible reptile populations
 - b) Water Voles - Given that water vole surveys in 2016 were largely hampered by vegetation management, i.e. no signs of this species were seen because the vegetation clearance had removed them. Should this survey still be considered valid? Officers would also like to know how many times the site was surveyed for water voles in any one survey year. For example baseline surveys should be the combination of at least two survey visits conducted at least two months apart to account for variations in habitat suitability across the season (or in this case habitat management). Therefore if only one visit was made per year what was the justification considering signs of burrows, feeding stations, and latrines

were found? It is understood that water voles will be resurveyed prior to the installation of the bridges; however clarification is required of the survey methodology previously used, and going forward, especially as approximately 28m of ditch (assuming 14m per access) will be affected by the new road access.

- c) Great Crested Newts – no objections to assessment
- d) Beach Ditch County Wildlife Site (CWS) – The site is currently designated for its submerged, floating, wet bank, and emergent plant species. These have not been specifically addressed in the ES. For example how will the installation of a box culvert protect such species? How will the loss of 28m of CWS habitat be compensated?
- e) Landscape and Ecological Management Plan - concern of the heavy reliance on hybrid poplar trees. Officers are unconvinced that introducing another monocrop poplar tree plantation into the area will have a positive effect on local biodiversity. This tree is widely planted as a short term rotation wood crop or wooded screen with maturity reached within 20 years. There are issues regarding mature poplar trees falling in high winds which could cause damage to property. Another fast growing native species such as field maple (*Acer campestre*) would have a much greater longevity than poplar and would present clearer biodiversity gains.

Transport

- 40. The Council seeks assurance from the County Council highways team that the implications of traffic generation, highway capacity and highway safety across the surrounding highway network have been fully assessed with regard also to the recent findings of the Ely to Cambridge A10 study.

Public Benefits

- 41. National guidance on energy from waste is contained in 'Energy from Waste: A Guide to the Debate' (2014). At paragraph 57 it explains that:

“In 2012 963,944 tonnes of refuse derived fuel (RDF) was exported. While such exports are permissible, the energy recovered from the waste does not contribute to UK renewable energy targets and is effectively a lost resource to the UK. The Government is keen to support domestic RDF and SRF [solid recovered fuel] markets, where they can provide better environmental outcomes, to ensure that the UK benefits from the energy generated from UK waste.”
- 42. The proposed EfW facility would contribute to the above national objective of capturing domestic refuse derived fuel for renewable energy production. It would reduce greenhouse gas emissions from landfill and displace fossil fuel generation. These represent economic and environmental benefits, which need to be considered in the determination of the application.
- 43. The proposal also has the potential for connection to the proposed new town at Waterbeach (Policy SS/5 of the draft Local Plan) to supply heat and/or electricity. Prior to determination, and should the County Council be minded to approve, the applicant will need to clarify how the proposed heat pipe connection from the EfW facility to the new town will be secured and delivered and by when. This is currently unclear from the

submitted documentation.

Recommendation

44. **Officers recommend that the Committee respond to Cambridgeshire County Council's formal consultation request with the assessment set out in this report and the following conclusions:**
45. The proposal would have significant and adverse visual impact on the local character and surrounding countryside due to its prominence, large scale and industrial appearance. This impact would be clearly visible from surrounding public viewpoints and contrary to Policies DP/2 and DP/3 of the South Cambridgeshire Development Control Policies DPD, 2007. Night-time lighting associated with the development also has potential for adverse visually impacts on both the surrounding landscape and the setting of listed buildings at Denny Abbey. Chapters 5 (landscape and visual impact) and 10 (cultural heritage) of the Environmental Statement do not fully assess night-time lighting impact in this regard and further information should be sought under regulation 25 of the Town and Country Planning (EIA) Regulations 2017 to enable a full assessment. Further information and clarity will also be required to address the ecological comments raised in this report.
46. The Denny Abbey heritage site is exceptional and its significance multifaceted, but its setting is a fundamental contributor to that significance including that of each listed building. The sheer size of the EfW facility, and its proximity and harm to the setting and views of Denny Abbey would be contrary to Policy CH/4. As paragraph 133 of the NPPF states: "Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal." Officers are of the view that the proposal is at the upper limit of 'less than substantial harm' and would cause serious harm to the setting of Denny Abbey's setting. Consequently, the level of public benefit required to outweigh this harm would need to be very high.
47. The proposal would result in public benefits in terms of the reduction in landfill and associated greenhouse gas emissions, displacement of fossil fuel generation and creation of renewable energy. These represent economic and environmental benefits, which we appreciate your authority will need to balance against all other material planning considerations and the tests of sustainable development set out in the NPPF. However, we would fully expect the harmful impacts outlined in this report to be given sufficient weight in the determination of the development proposal.
48. Prior to determination, and should the County Council be minded to approve, the applicant will need to clarify how the proposed heat pipe connection from the EfW facility to the new town will be secured and delivered and by when. This is currently unclear from the submitted documentation and we would expect to be consulted on any conditions or S106 legal obligations in this regard.

Background Papers:

The following list contains links to the documents on the Council's website and / or an indication as to where hard copies can be inspected.

- Cambridgeshire and Peterborough Minerals and Waste Development Plan Core Strategy Development Plan Document (CSDPD) (2011)
- Cambridgeshire and Peterborough Site Specific Proposals Development Plan

- Document (SSPDPD) (2012)
- South Cambridgeshire Local Development Framework Development Control Policies DPD 2007
 - South Cambridgeshire Local Development Framework Supplementary Planning Documents (SPD's)
 - South Cambridgeshire Local Plan Submission 2014

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Appendix 1 – Submitted Plans and Visualisations

Appendix 2 – Photomontage Viewpoints