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Principal Minerals & Waste Officer
Central Bedfordshire | Council
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29 May 2014

Dear Mr Peachey

Planning Application 14/00815/FULWM

Green Waste and Wood Recycling facility - Thurleigh

Thank you for the opportunity to comment on the above application.

CPRE Bedfordshire is strongly objecting to this application for the following reasons:

1. This is in fact a “hybrid application” for wood waste on the one hand and green waste composting on the other.

These two waste streams are quite distinct in terms of their hazard, processing regimes and their end products. This is recognised in the M & W Local Plan adopted Jan 2014. The applicant however relates most of the application to green waste and the regulations relating to the siting of green waste facilities ignoring the conditions relating to the processing of wood waste.

It would seem that the applicant is trying to obtain permission for the processing of potentially contaminated wood waste on the back of a green waste composting facility.

The M & W Local Plan clearly states in WSP6 that wood waste (non-hazardous waste transfer and recovery) recycling facilities should only be permitted on what are effectively brownfield sites.

Waste wood can comprise a variety of materials with a range of contamination. Even when not categorised as hazardous waste, various contaminants can be assumed to be present from paints, preservatives, bonding agents, aerosol contaminants etc. Ideally it should be located at the nearby Twinwoods site where some of the wood will be used in the energy from waste plant currently under construction. This would significantly reducing double handling and all the adverse issues relating to that additional process. Or, it should be located on another convenient brownfield site.

The application is therefore in direct conflict with the M & W Local Plan and should be refused on this basis alone.

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The NPPF clearly states that if an application does not conform to the Local Plan then it should be refused - see NPPF para 12 “..... and proposed development that conflicts (with an up to date Local Plan) should be refused unless other material considerations indicate otherwise.” There are no “other material considerations” in this case.

2. Inappropriate site location

The proposed site is a “greenfield site” on open farm land located in the rural area outside any current or proposed development area.

The NPPF clearly states in para 111 that “Planning policies and decisions should encourage the effective use of land by re-using land that has previously been developed (brownfield land)”.

The siting of a recycling facility of this sort provides an ideal opportunity for the planning authorities to implement such a recommendation.

In para 112 the NPPF states “local planning authorities should take into account the economic and other benefits of the best and most versatile agricultural land local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality”.

The government’s advice on the matter is confirmed in terms in MWSP3 para 4.21.

The applicant does not give details of the Agricultural Land Classification (ALC) for the site but we believe it to be Grade 2 - one of the highest grades.

It should therefore not be used for this sort of development except in the most exceptional of circumstances - we do not believe that this is one of them.

The government has previously advised, in the case of renewable energy projects for example, that an applicant needs to justify why “the best and most versatile agricultural land” has to be used for development - the applicant has made no such justification in this case.

3. There is already sufficient Green Waste Composting capacity in Bedfordshire and Bedford Borough

We understand that in 2012 Central Beds Council compiled a report, “Assessment of Need for Additional Waste Management Capacity”. This concluded that “There is a surplus of green waste treatment capacity throughout the Plan period (up to and including 2028/29).”

This would indicate that the principal “driver” for this application is in fact wood waste recycling capacity and this should, as stated earlier, be located on a brownfield site as per WSP6.

4. Dwellings at the margin of the safe distance from the proposed composting site

The safe distance from a green composting facility is “at least 250m” according to WSP7. Our calculations show that Coplar Farm is within the 250m limit when the distance is measured from the proposed site. **The site is therefore very likely to pose serious health risks to nearby residents.**

There is also a substantial fire risk from the large amount of wood waste that will be held on the site. The applicant has already experienced a fire at their Ravensden site.

5. Traffic issues -the huge number of HGV's using the site will be a serious danger to cyclists and will transform a relatively peaceful rural road into an unacceptably busy commercial freight terminal totally inappropriate to the area.

The proposed entrance to the site is in Milton Road and it is expected that for a rural road a massive 200 HGV and other commercial vehicle movements per day, 7days a week, will be generated by the facility.

Recognising its quiet rural nature, Milton Road has even been designated by Bedford Borough Council and the previous County Council as part of a "quiet route" for cyclists (see attached maps).

There are an ever-increasing number of recreational cyclists using the route during the day and most particularly during the weekend.

We note that the only analysis of cyclists using the roads in the applicant's Transport Assessment seems to have been completed during the week on one day only - a Wednesday - and on Thurleigh Road - not on Milton Road.

Cyclists use Milton Road to reach Thurleigh, Keysoe, Little Staughton, Great Staughton, Grafham Water etc. also Bletsoe, Risely, Swineshead etc. and other villages all around.

The applicant's Transport Analysis has made no analysis, assessment or provision for cyclists either when considering the wider impact of the application (i.e. HGV and commercial traffic using rural routes) or the specific issues relating to the site and Thurleigh Road junctions and the immediate area. This is in direct conflict with Bedford Borough Council transport policies.

We consider that this very large number of HGV and commercial vehicle movements will present a very real and particular danger to cyclists and therefore other traffic. Especially when HGV's are turning into and out of the site but also when HGV's and commercial vehicles are using the cross-country routes which they certainly will. This is in direct conflict with NPPF para 35 requiring priority to be given to cyclists and requiring safe and secure road layouts for cyclists. It is also in conflict with Bedford Borough policies CP2, CP29, AD39 and the Active Travel Strategy in LTP3.

Milton Road is very narrow at the point of access to the site and as the "swept path analysis" for a 16.5m articulated vehicle shows, (see Transport Analysis Appendix G) with the proposed new site entrance, there is very little room between the kerbs and the HGV when exiting or turning into the site. This will be extremely dangerous for cyclists.

One of Bedford Borough Council's key policies is to promote an increase in the number of people cycling and the proposed site and its HGV movements will be in direct conflict with it.

There is no suitable alternative route for cyclists.

We are very concerned that the Borough Council's Cycling Officer does not appear to have been consulted on the proposal.

This number of commercial vehicle movements will completely transform this quiet rural road into a very busy commercial terminal (for which it is totally unsuited) with more than twice the number of vehicle movements currently allowed at Ravensden.

We find this completely unacceptable for such a rural area and it is totally unsustainable.

The current Ravensden site does not have these issues and is much better suited to HGV traffic.

6. Damage to a county wildlife site.

The suggested access for the recycling facility is through Thurleigh Cutting County Wildlife Site which is also designated by the Borough Council as the Bletsoe-Thurleigh Roadside Nature Reserve.

We agree with the detailed objection already made by Bedfordshire Wildlife Trust which has highlighted the potential destruction of an important nature area in contravention of M & W Local Plan policies GE12 and GE13.

7. Suitability of the applicant to develop and manage a modern recycling facility

We have been very disturbed by recent photographs of the applicant's current recycling facility at Ravensden which have been shown to us by the local campaign group. We have these photographs available on CD.

At best the photographs indicate very poor attention to cleanliness on the site and the surrounding farmland with litter of all sorts strewn everywhere, in the watercourses and for quite some distance outside the site. At worst they demonstrate poor site maintenance and a complete lack of investment in the site over the period that it has been operating.

It is the complete antithesis of a modern waste recycling facility and reflects very badly on the operator's site management ability.

We understand too, that the operator was served with a compliance notice because they did not conform to important details of the planning application granted for the site notably, the planting up of bunds surrounding the site, despite several requests from local people and the Parish Council.

We also understand that there was a very serious fire of the wood waste on the site quite recently.

These are very important issues and should not be treated lightly - there is nothing in their past record that would indicate better management of a new site.

Finally, we propose the following as a solution to this waste management issue that will not require the development of this valuable greenfield site or the destruction of a peaceful rural road network:

- The retention of the current site in Ravensden for green waste composting
- A new brownfield site (as required in WSP6) for the wood waste facility

Allowing for proper specialisation of each - done correctly they are very different processes with their own operational issues.

This proposal will also minimise the HGV movements at each site to a more sustainable level.

Yours sincerely

Gerry Sansom
For CPRE Bedfordshire