

Objection to Planning Application CD4/0706/63 In-vessel Composting Plant and Highways Agency Relocation To Grassmoor

On behalf of and signed by Grassmoor Campaign Group

23rd August 2006

James Cook
Planning Control
Environmental Services
County Hall
MATLOCK
Derbyshire
DE4 3AG

Cc Natascha Engel MP
Cc Cllr David Chapman

Dear Sirs,

Re: Planning Application CD4/0706/63

This document is the outline document and forms the basis for the objection to the proposed construction of the In-vessel Composting plant (IVC) and proposed relocation of the Highways Agency to Grassmoor village.

This document has been compiled by representatives of the 'No Not This Time in Grassmoor' Campaign Group, taking into consideration comments made by Grassmoor residents.

Also residents of nearby Corbriggs, Hasland, North Wingfield, and Winsick have had input to this document.

This is in addition to the individual correspondences and objections that have been sent over the past few weeks and month to Derbyshire County Council, Councillor David Chapman, and Natascha Engel MP.

This document is available for public viewing, and 'Marked for Public Access'

These pages deal with the application in 2 parts, for simplicity, with an overall summary.

Section 1 - In-vessel Composting Plant

Section 2 - Highways Agency

Section 3 - Overall Summary

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SECTION ONE In-vessel Composting Plant (IVC)

It is acknowledged and accepted by all people who are involved in this objection that recycling must be considered as a way forward to reduce landfill and for the benefit of the environment. There are outstanding individual examples of people who have been recycling and creatively dealing with their waste for numerous years. So it is fair to say from the outset, that the “No Not This Time Campaign Group” is more than aware of the need to reuse and recycle.

We are also aware of new Government legislation and targets that Derbyshire County Council (DCC) is facing in the future and the deadlines therein.

The objections below, set out to prove that the proposed build in Grassmoor is inappropriate and that the business and planning case unsound, and flawed.

It has never been made clear why the existing sites are now unsuitable, and could not be upgraded.

Despite this plant’s proposal, it is unlikely (by extrapolation of the numbers) that the Governments targets could be met.

The objection for the IVC falls into the below categories:

1.0 SUMMARY

Grassmoor has suffered for many, many years and has battled with it’s reputation, standard of living and stigma associated with the Avenue Coking works, and the polluted lagoons that are still prevalent even today. Grassmoor is now becoming a nice place to live, property is increasing in number and value, and people are taking pride in their surroundings.

Construction of this Plant will inevitably lead to issues that will impact all of Grassmoor and the surrounding communities. From the evidence we have gathered so far and reports about objections to other composting plants, we believe this impact will be negative.

From the outset this development is not appropriate for a residential area.

At the initial consultation meeting in Grassmoor the Derbyshire County Council officials made various statements attempting to allay people’s fears of the negative consequences of building the Composting Plant. Having received the planning

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application and read it, some of these statements have proven to be misleading and blatantly untrue, making the public consultations pointless, and insubstantial and unsound

For example at the consultation, the DCC officials told us that plant would only handle green waste. On p12 of main volume one, cardboard is mentioned. Further on there are references in the Planning application to kitchen waste being collected as well as green waste. We would like clarification of which statements are correct?

Contradictions about the type and quantity of vehicles that will work at the IVC, and operate from it, and travel to it, appear throughout the published literature, there are no bottom-line numbers or clear concise details. Vehicle type and quantity vary from the original proposals in your leaflet, to information presented at the public consultation and finally in the planning application. And then throughout the supporting documents. For example, there are no considerations made for skip lorries (skips are referred to as being held on-site) or water tankers.

This is a fundamental, and must be bottomed out. Simply put, the documentation is contradictory, unclear and vague on many levels.

These proposals are unsound, flawed, being pragmatic, the infrastructure cannot handle this plant locally. Access to the site is not ideal with only one entrance, and it is stated that traffic will arrive simultaneously and converge on the one gate in specific time windows.

Throughout the documents there are discrepancies, associated with (for example) the staff numbers that will work there, the waste type, quantity and type of vehicles, to name a few.

On a wider point DEFRA as part of WS2000, state their objectives and aims. The building of this plant has risk, and will affect two protected species. And the aims specifically state, WITHOUT risk. Also, it says in the principles that there should be effective community engagement, and this has definitely not occurred.

This further leads to the fact that the basics are incomplete, from initial consultation, to the proposal itself.

The supporting detail behind this summary are listed out below, under four main headings.

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1.1 TRAFFIC

Traffic is a major concern, and residents of the above village locations state that this is not addressed adequately, properly, and there are discrepancies throughout the Derbyshire County Council, Axis, and Bennett Fergusson documentation.

- In Grassmoor, two Lorries cannot pass side by side through the village, this is a daily occurrence throughout the proposed operating times of the plant. This is due to residential parking and customers visiting the village shops and Pharmacy. This will cause traffic hold ups and problems and it is not addressed in the plans. There are bus stops along this road. Maybe Stagecoach Bus Company would have a view on this issue ?
- In the afternoon peak-time lorry arrival at the plant as quoted in the main Volume 1 coincides with school closure time (3-4pm) This would increase the risk of child accidents, and consultation with Grassmoor Primary School should be required and officially noted.
- There are only three routes out from the Plant. Two of these routes pass by Grassmoor Primary and Hasland Primary school Grassmoor Primary School needs to cross the road to access Grassmoor Park and Hasland Primary School needs to cross the road to access Hasland School fields. Proposing a plan of such magnitude with operating peak-times to coincide with school times is disaster waiting to happen.
- The third route would funnel traffic through the constrained Corbriggs area, past an accident blackspot (at the top of Hassocky lane where it meets Mansfield Road) where lorries would be forced into hill-starts. When taking this route any plant traffic would then feed into the congestion at the Donkin roundabout.
- All routes pass family housing and houses.
- Emergency vehicle progress through the village could be impeded if the roundabout becomes blocked by vehicles converging on the main gate all within a narrow time window, likewise when progressing through the village and having to wait for one of the many new HGV's travelling the route.

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- The mathematics of the vehicle numbers quotes in the planning application, referred to at the community meeting, and displayed in the Derbyshire Times are all inconsistent, and there are discrepancies. Vehicle quantities shown are mis-represented and not consistent; the types of vehicles are not consistent or accurate. There are many deviations and contradictions as the planning application progresses, indicating that DCC has not clearly understood or addressed the type and quantity of vehicles. For example there is no provision for potentially required water tankers or skip lorries.
- There is only one Zebra crossing along the busy shop area. The increase of traffic and the type of traffic proposed through the village's main road will impact on this crossing.
- Grassmoor has an increasing number of elderly people in the community who cross the road daily, using scooters and on foot. The increase in traffic will also create a larger risk of accidents for elderly people utilising the village amenities. This cannot be ignored.
- Such a large volume of traffic would increase the rate of road degradation. Grassmoor village already has a poor tarmacadam surface, and is prone to flood in heavy rain.
- Pollution from the vehicles arriving and departing the plant as they belch out fumes will be an issue in such an enclosed residential area.
- Pollution from vehicles operating at the plant. It is not clear what fuel these will use, and if they will be exempt from current highways legislation. Clearly this pollution will be different from visiting vehicles.
- There will be a vehicle and wheel wash near the entrance to the gate, presumably this must have lights and will be noisy, based on the sheer numbers of vehicles, yet scant mention is made to this during the proposal.

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1.2 NOISE

We believe that there will be a large noise issue from the construction of the plant and from the actual operation.

No matter what precautions are instigated, there will be a noise issue throughout the operation of the plant. The fact that the Plant will be located in a 'valley' means that in addition to the noise spread in the immediate vicinity, there will also be the 'channelling' of noise thus making the sound waves actually travel further.

Excess noise will come from

- Vehicles reversing and moving. Bin lorries, Plant Diggers, HGV's, and smaller plant-related vehicles – The planning application says that alternative solutions will be investigated to mitigate this, however, realistically, for Health & Safety reasons it is unlikely that (for example) noise emitters on vehicles will be turned off. We look forward to being consulted further about these investigations.
- Noise will occur at un-social hours. The planning application states a 9 hour per day, 6 day per week operation (Bank Holidays not specified) with a 5 hr operation on Saturday's. To operate outside peak times this is likely to occur early in the morning.
- There will be peak-time loading and unloading noise
- The operation of the plant itself, such as Boilers firing to maintain the 60 degrees will feed into the above disturbance too and the constant noise of the plant and the scraping of diggers.
- There will be relentless noise of the shredding machine, when waste is received into the plant.
- As all on-site staff are to wear ear defenders, we anticipate that local noise will be high, despite any efforts to mitigate.
- As stated in the planning application there will be noise from the HGV' and Dustbin lorries as they arrive and depart full and empty (two distinct types of noises)and travel over speed humps as laid throughout Grassmoor village and the route to Hasland.

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- Noise pollution will lead to stress for nearby residents. We already have evidence of stress by residents living near to the Avenue Coking Plant during its operations. By admission of the DCC any area that is residential with such a large operation will cause stress on villagers.
- The building of the plant is not subject to any legislation, and long days are proposed for the construction.

1.3 LIGHT

In the plans it is suggested that sodium flood lighting will be applied to the site for the lighting of the vicinity.

- When floodlighting is required to illuminate a site, there is always spread of light, leading to general and widespread light pollution.
- Lights will be turned on when light falls below a certain level. This area is liable to fog (as demonstrated numerous times throughout the year), which will lead to adverse light pollution in the area. Particularly for local residents.
- There is a risk that these lights will distract motorists on the main road past the sites (and on A61) and lead to accidents.
- Lights will be required for the early part of the day, as part of the peak-times avoidance procedure which will be, at very least, a nuisance
- Flashing amber lights will provide an attention grabbing visual distraction to all people who look towards the site, both when passing, and for nearby residents.
- For security purposes, it is stated that the plant will be lit ambiently. Again this will be anti-social, and an issue for anyone who looks towards the site.
- The entrance proposed is from the roundabout at the bottom of Grassmoor village, again this busy gate will be required to be lit at all times day and night, again increasing accident rates, and nuisance.

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1.4 ENVIRONMENT/HEALTH AND SAFETY.

- There will be an increased risk of accidents due to the type and volume of vehicles visiting the plant. This would occur from the initial build, and through the operation as it is currently proposed. One time of operation clashes with the School rush (see section 1.1.2)
- There is an unjustifiable risk to key groups of people, such as the young and elderly. Research shows. In deprived areas, traffic accidents involving children are more likely. Grassmoor is classed as a deprived area.
- Traffic congestion will be an issue along Grassmoor main road, North Wingfield Road, leading to people taking short-cuts along Chapman Lane and Norfolk Avenue This would also be an issue along Henry Street, Shakespeare Street, and Westhill Lane This is likely to lead to serious accident and fatality.
- Grassmoor already has a high asthma rate amongst its elderly and young people and children. The influx of the lorries, their fumes and the particulates blown from the plant will influence this negatively. Composting studies have shown respiratory disease can increase where these plants are located.
- The air quality in Grassmoor is currently not good. This proposal will make the air that we breathe significantly worse and there are aspects of the process that are not fully enclosed. (At the public consultation it was stated by DCC that the process was fully enclosed – this is a discrepancy requiring answer). The odours and particulates will impact all surrounding areas as the wind blows in all directions.
- Ozone is used in the process, when an odour is detected. This means that
 - 1) There must be a smell/issue detected to deploy ozone. I.e. residents are affected.
 - 2) Ozone is hazardous to health in the short and long term
- As the plant will be operational 9 hrs per day, there is a lasting impact on the environment, on Saturdays (5hr operation) many people will be home, and this increases the risk to health, for the many residents who are home. Again Saturday sees an increase in people making use of the village facilities and crossing the nearby roads.

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- Medically there are well-known and documented cases of body fungus that can occur with intensive operations such as this. Diseases such as Aspergilli's and 'farmers lung' are realistic. Aspergillus is an allergic reaction that is more prevalent in asthma sufferers.
- At the DCC consultation meeting only 'Green' waste was mentioned as being treated at the plant. However in the planning application kitchen waste has been added. This is a discrepancy. The 40,000 tonnes mentioned suggests all green waste, however on page 12 of the main volume one this becomes kitchen/green waste. This tonnage breakdown requires clarification.
- If kitchen waste is to be treated onsite this leads to other issues. There is likely to be bird, rat and fly infestation of the vicinity, which will damage the surrounding ecosystem and issues for local residents. Again there is no mention of how this will be dealt with. In building a larger Culvert to mitigate the flood risk DCC are actually building a bigger rat home for vermin to live in.
- Mitigation for the vermin issue is stated as "Rapid Turnaround Of Waste" – The IVC process requires that the waste is held on-site for weeks dependant on the quality of the compost desired.
- Vermin professionals will only be present once an issue is raised. i.e there must be an issue (like the odours issue) before it is dealt with – Again this impacts the residents, and is not a mitigation approach.
- There will be increased stresses placed on those who are close enough to be subject to the noise barrage of the plant operating, and those close enough to be affected by undulating light pollution.
- It is unclear how the site will handle disposal of animal by-products, as this is likely to be mass quantity from the 30 movements per day bringing in the waste from the areas mentioned in the plans.
- There is no provision for how the plant will handle any incorrect waste that finds its way to the Plant. Again this requires clarification.
- The proposal suggests that waste will be siphoned off into the river, which has environmental consequence. There is no such thing as clean water by-product.

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- Without alteration the area could flood. With the increase of water levels and our wetter climates without structural alteration the plant is in danger of being submerged.
- Any work to address the above will significantly alter the river profile – Again with consequence.
- Fluids from the composting process are likely to leak into surrounding area's with consequence.
- Environment Agency consent has not been given for the discharging of the fluids into the river Rother.
- Environment Agency consent has not been given for Pollution Prevention and Control.
- Two protected species will be impacted by the Plant construction, and subsequent operation. This is also unjustifiable. The long term effects on the Water Voles and Great Crested Newts are not clearly addressed or understood. It is highly likely that they will be drawn by the waste and the smells.
- The above mentioned creatures will also be affected by bio-aerosols, ozone, habitat alteration, and day-to-day operation and noise. They will also breathe in polluted air. Adverse affects that will affect downstream too.
- The risk of fire is absolutely not covered or addressed. There are chemicals on-site, and dry storage area's not to mention the waste itself.

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SECTION TWO Highways Agency Relocation

This is a separate and concerning addition to the plant proposal.

This proposed relocation causes major worry through the village and surrounding area and again it is hard to really see where any benefit will come to Grassmoor.

2.0 SUMMARY

There does not really appear to be a solid demonstrable case to move the highways agency to Grassmoor. This proposal looks weak, and the advantages listed come with some tangible downsides.

The business case for the vehicle movements is inaccurate and has been slanted to make the numbers appear more comforting to the villagers of Grassmoor and surrounding areas.

This relocation, which will be separated from the Plant by a fence, raises different concerns. However for ease have divided the objections/issues and concerns into the previous four distinct area's.

The plans say that this facility will take all of the Stonegravels vehicles and give rise to new facilities, without actually listing what they are (Page 42 section 5.3.4)

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2.1 TRAFFIC

- Grassmoor will see a huge percentage increase in traffic passing along the aforementioned three routes.
- This will run 24 hours, 7 days a week all year long, which is inappropriate for any residential village location. The output of night traffic particularly in Winter will be staggering.
- Gritting Lorries have been excluded from the calculation it appears, therefore proving the numbers have been artificially lowered.
- There has been a distinction made between the 13 Gritters and 8 additional operational vehicles. Grassmoor could feasibly be handling 21 Gritters in the winter if the extrapolation of these numbers is correct, which is nearly half the entire fleet of DCC. This is a discrepancy.
- Page 72 Section 6.3.3 contradicts the above numbers. Suggesting 18 Gritters.
- If the above is inaccurate the Grassmoor and surrounding areas will still be handling over a quarter of the DCC fleet!
- There is a discrepancy between the volume of Gritters' in the non-technical summary, and the environmental statement.
- It is interpreted that staff arriving to and from site is not classed as a movement, as there are large quantities of vehicles to be based at this location, and fewer staff. On page 35 of the main volume one, 41 car parking spaces are to be allocated; however there is to be over 100 staff. This ratio appears to be wrong, where will these other staff be able to park ?
- Staff will be driving to and from work, adding to village traffic issues, and feeding into existing traffic hotspots in Chesterfield, such as Derby Road and the Donkins roundabout.
- The above staff could be arriving at peak times, which creates further congestion. If not, there will be excess noise, particularly in Summer when windows are open, for nearby and roadside residents as vehicles arrive and depart.

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- There seems to be no mention of Diggers operating from the site, is this correct ? These types of vehicle, are very noisy and cumbersome, and create congestion. This will lead to nuisance and accidents.
- The survey for access to the site states “satisfactory” it seems more likely that the roadways will need to be altered to accommodate this influx, which will impact nearby housing, and its residents.
- Once again there is a discrepancy of the quantity of vehicles moving in and out of site. This number was doubled in the planning application advert in the Derbyshire Times from the original quantity stated in the consultation leaflet.
- Page 42 section 5.3.4 states access to Chesterfield areas as being good, however all routes pass schools and will only add to congestion hot spots.
- Despite having had consultations with the local Highways Authority (page 75 section 6.1.4) there have already been occasions where two or more Bennett Fergusson HGV’s have created an obstacle on the roundabout when multiples have arrived simultaneously at the proposed entrance. This suggests a junction performance survey ought to be undertaken, maybe with a view to traffic lights being installed.

2.2 NOISE

- This large increase in traffic will be travelling over existing speed restrictions in Grassmoor and Hasland (speed humps). This will lead to a substantial increase in noise which will vary according to the vehicle, and its load. ie. an empty vehicle will make more noise.
- It is likely the above will lead to nuisance and property damage thru vibration.
- There will be the constant shrill noise as vehicles reverse from their sensors.
- There potentially will be the noise of doors slamming, and vehicles revving to move off 24x7.
- There will be substantially more noise after dark, when people are trying to sleep, and relax.

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- There is the likelihood of vehicle alarms going off day and night, where such a large number of vehicles operate.

2.3 LIGHT

Without repetition of the IVC points made, although several are appropriate and do apply, we outline further light pollution points below

- Amber lights will provide an attention grabbing visual distraction to all people who look towards the site, both when passing, and for nearby residents, this will be a real issue when gritting
- There will be HA specific lighting, which again is likely to cause disturbances and distraction to all residents who overlook the location, or motorists who are passing.
- Headlights of vehicles will be another addition to the growing list of lights. Again the roundabout is prone to fog, and hence there is a risk of accident.

2.4 ENVIRONMENT/HEALTH AND SAFETY.

- There is a lot to be said for such a large concentration of vehicles operating from one location. This is not going to be beneficial to the people of Grassmoor, or add to the air quality. There is a real pollution risk (in addition to those listed as part of the IVC) from diesel/petrol exhaust fumes and particles.
- There is likely to be a significantly large increase in the accident rate in the village, as the qty of vehicles listed is a large percentage of the total throughput through the village per day.
- There is risk to the Council workers as they try to pull out of the facility to the roundabout.
- The verges will be damaged in winter due to the constant toil of the Gritters. The salt will always fall from the Lorries as they move from their initial start point.

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- There is a salt risk to property, private cars and homes, as the Gritters travel past, on towards their routes.
- Will the vehicle wash run 24x7 like the Gritters? – This is unclear in the proposal.
- Wherever the vehicles travel to and from, they will be bringing the muck on them, back through to the proposed Highways Agency site, through Grassmoor and surrounding areas.
- There is a secure area mentioned. Will this contain chemicals ?
- Again there is no real substance regarding the fire scenario. And the HA proposal lists a fuel store, and no idea as to its size ? - What would happen in the event of a disaster, in such close proximity to housing ?
- There is no mention of the salt dome and how the 3000 tonnes of salt will get there, and the associated ‘movements’ quantified.
- As regards the mentioned recycling bays, would these be for public use, therefore bringing more vehicles in ?

3.0 OVERALL SUMMARY

We believe we have presented valid objections in this paper as to why the planning application should not be granted.

The public consultation has been flawed as information presented proved not to be the case and often contradictory to written information in the planning application. We have cited examples in this report of these contradictions and the lack of clear concise and accurate information from the Derbyshire County Council officials.

We conclude that DCC has not given due consideration to other identified sites in its initial plans and seem to have chosen Grassmoor as an easy quick fix solution.

DCC has only pursued the Grassmoor site. At the public meeting other sites were mentioned as alternatives, however, there has been no further information given to residents about these sites as requested and as to why Grassmoor was deemed the

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most justifiable? A significant amount of work has been ploughed into the Grassmoor application, and looking at the dates, this seems to have been going on for sometime.

The above proposals are not right for Grassmoor, or any close residential area. Grassmoor has a heritage of waste and pollution, the people do not want this.

Individually these proposals do not make sense on many levels; however, put side by side they are clearly not the right thing to do.

These proposals will hurt the people of Grassmoor and surrounding area's, affect their health and wellbeing, and damage the ecosystem in the immediate area, where there are two protected species.

From the initial inception, large amounts of the basic fundamentals of the proposal have been vague, and or/missing.

The policies as laid down in WS2000 in principles and aim have not been followed, these plans and the way they have been executed fly in the face of the DEFRA documentation and as a consequence there is a significant amount of unrest associated with these plans.

At the public meeting, information was not presented accurately, or honestly, for example, one of the representatives said that there would be a recommended route for the vehicles to use, this, however, has not made it into the plans.

It is likely that this plant will cost more to build and operate than originally thought, there are timelines that will be broken as there are some weighty discrepancies to be addressed before moving forwards.

The infrastructure will need to be upgraded, to address the main road flooding during heavy rain, and possibly traffic lights to replace the roundabout at the main entrance to mitigate obstruction, and risk of accidents.

This application clearly contravenes many of the waste policies and has been manipulated in order to cover up major flaws in the viability of this application. A full report on these issues will be submitted in due course.

We hope that you can see there is not a demonstrable case for moving the two facilities to Grassmoor.