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Proposal:	Expansion and improvement of the Sludge Recycling Centre including improvements to the site access junction with Bull Lane, improvements to visibility splays and creation of passing bays along the access road
Location:	Aylesford Sewage Disposal Works Bull Lane Eccles Aylesford Kent
Applicant:	Southern Water Services Ltd

1. Description:

- 1.1 This proposal is an application for the expansion and improvement of the existing Sludge Recycling Centre at Aylesford Wastewater Treatment Works. As the development relates to the treatment of waste, the application falls to be determined by the County Council. The proposed development involves the erection of a whole series of new buildings and the refurbishment of existing plant. The proposed development will be carried out within the confines of the existing treatment works and on previously developed land. The access onto Bull Lane will be widened to improve visibility and accessibility to the site.
- 1.2 The applicant states that the proposed development “*is to provide a centralised sludge recycling facility for West Kent at Aylesford WTW. Aylesford WTW already has a Sludge Recycling Centre, which along with a number of other centres in West Kent, has sludge treatment plant which is in need of modernisation. The Aylesford scheme is an integral part of Southern Water’s Sludge Strategy and the scheme will secure the required increase in treatment capacity and improvement in sludge quality needed for West Kent.*” The application is accompanied by an Environmental Report.
- 1.3 The proposal involves the erection and refurbishment of the following plant and buildings:
- Cake reception building (21m by 6.5m by 9.5m high);
 - Boiler house (15m by 10.5m by 5.8m high);
 - Sludge cake storage silo (Diameter 6.5m by 16.9m high);
 - Sludge screens (10.5m by 8m by 6.1m high);
 - Post Screening Storage (Diameter 12.6m by 7.1m high);
 - Tank and Picket Fence Thickener (Diameter 10.8m by 7.35m high);

- Conversion of tank to thickened sludge storage (Diameter 12.9m by 4.15m high);
- Sludge Digester and Heat Exchanger (Diameter 12.9m by 16.4m high);
- Gas holder (spherical 12.1m by 12.2m high);
- Flare stack (diameter 1.9m by 6.13m high);
- Centrifuge container (10.3m by 2.4m by 6.57m high);
- Cake storage bays & modification to existing sludge drying beds (55 & 56m by 26.3m by 1.4m high);
- Sludge treatment outdoor control units (12m by 8m by 9.5m, with stack of 15m high and diameter of 0.6m);
- Liquor balancing tank (diameter 6.1m by 6.1m high);
- Blend pump kiosk (6m by 4m by 3.65m high);
- Digested sludge transfer pump kiosk (5m by 4m by 3.65m high);
- Liquid sludge reception tank (diameter 6.9m by 5.45m high);
- Three sludge consolidation tanks being fitted with GRP roofs with a new pumped mixing system installed;
- Two sludge digesters being structurally repaired and fitted with new mixing plant;
- The installation of additional plant in the centrifuge building;
- Reconstruction of existing storage bays.

2. The Site:

2.1 The application site lies within a rural area and the access road on Bull Lane lies within the Strategic Gap. The site lies to the west of Bull Lane, between Aylesford and Eccles, with sand and gravel quarries to the south, east and north. To the west of the site lies the open storage at the Island site. The existing Wastewater Treatment Works is a 15.6 hectare site, containing both the water treatment operations and the Sludge Recycling Centre. The site contains a large number of filter beds, plant and buildings. The Sludge Recycling Centre lies in the north-eastern section of the application site. The tallest existing building within the Sludge Recycling Centre area is 10m high.

3. Planning History (most relevant):

- 3.1 TM/05/03430/EASC Does not need an Environment Statement 12.10.2005
Screening Opinion under Regulation 5 (1) of the Town and Country Planning
(Environmental Impact Assessment) (England and Wales) Regulations 1999 for
Proposed expansion and upgrade of the sludge treatment facility.
- 3.2 TM/93/01032 Approved 11.10.1993
Replacement sludge press building.
- 3.3 TM/93/01031 Refused 30.11.1993
Variation of conditions 4 and 5 of planning permission TM/92/219: Increase in
throughput of industrial waste from 100K gallons per week to 240K gallons per
week.
- 3.4 TM/92/00219 Approved 03.09.1993
Treatment and deposit of industrial liquid waste brought into the works by road
tanker.
- 3.5 TM/75/87 Approved 28.02.1975
Construction of reinforced concrete channels and chambers for preliminary
treatment of sewage and new access road.
- 3.6 MK/4/73/272 Approved 17.05.1973
Sewage pumping station.
- 3.7 MK/4/71/769 Approved 22.02.1972
Erection of a sewage pumping station.
- 3.8 MK/4/71/117 Approved 04.08.1971
Erection of extensions to the existing sewage installations.
- 3.9 MK/4/65/215 Approved 26.05.1965
Erection of sewage pumping station.
- 3.10 MK/4/60/287 Approved 28.07.1960
Erection of administration building, pumping station, boiler house and two
dwellings.

4. Consultees:

Consultations carried out by TMBC:

- 4.1 Chief Engineer: *Pilgrims Way/Bull Lane Junction*: The submission makes little
reference to this junction, the geometry of which is not well suited to accept
additional HGV movements. An increase in numbers and frequency of HGV's, also

increases the potential for opposing HGV turning movements. There is very limited highway capacity to accommodate coincidental, HGV turning movements at this junction.

- 4.1.1 Sight lines are a problem here particularly for drivers emerging from Bull Lane onto Pilgrims Way. Located to the right of the junction are gas and water control apparatus. The position of these services dictates the level of the verge and this restricts the view to the right and also restricts the forward view for traffic approaching the junction from the direction of the A229.
- 4.1.2 To the north west of the junction, an early view of traffic emerging from the junction and traffic approaching the junction is restricted by the brow of the hill. Forward views of the junction remain restricted for drivers travelling from Burham due to the alignment and topography of the road. Some traffic management measures are due to be introduced by KCC this year at this junction. These are designed to enhance a driver's perception of the nature of the road ahead.
- 4.1.3 There are other site constraints present which preclude the installation of other highway improvements. The presence of the deep excavation to the west of the junction which supports the highway and the stability of the tunnel under the highway has been the subject of local concern for some time. There is no indication in the submission that these structures are capable of sustaining the additional HGV movements that could be generated by this application.
- 4.1.4 The crash history is low and bearing in mind the present numbers of drivers that regularly use this road it appears that the vast majority do so in a proper manner.
- 4.1.5 *Existing Parking Patterns in Bull Lane:* Little reference is given to Bull Lane in the submission. There is limited off-street parking for many residents in the village. Existing parking patterns have evolved on the north-west side of Bull Lane between Hawkes Road and Greenfield Close. There are an increasing number of cars parked throughout the day restricting the available width of the road down to a single lane. From late afternoon through to early morning the density of parking is very high and this coincides with the operational times indicated in the application. Traffic management features to protect the bus stop areas are proposed by KCC for installation this year along with a central island at the Hawkes Road junction. Both of these features will create road narrowing. Entry treatment and enhancements to the speed terminal signs are also proposed to manage the speeds of through traffic.
- 4.1.6 *Pedestrian Safety:* There is no off-street parking to accommodate traffic generated by the recreation ground and football pitches situated either side of Bull Lane. These facilities are frequently used throughout the week as well as weekends and do put additional pressures on the capacity of Bull Lane and the surrounding roads.

4.1.7 The area around the recreation ground attracts a high level of pedestrian activity. Pedestrian movements are generated from the residential area to the west of Bull Lane to any one of the three access points to the recreation ground on the opposite side of the road. Visitors arriving by car to the sports and recreational facilities also have to cross over Bull Lane.

4.1.8 There is further parking and pedestrian activity present at each end of the school day during term time as the school entrance is adjacent to Bull Lane.

4.1.9 The footway from Aylesford Village to Eccles is continuous. However it narrows to less than 1 metre in width before crossing over to the opposite side of Bull Lane at Rowe Place Farm at the southern entrance to the village. The sight lines are not ideal and present the potential for conflict between pedestrians and traffic.

4.1.10 *Clarification of proposed operational times and number of additional HGV movements:* It appears that there is conflicting information and interpretation of the number of actual additional HGV movements this application could generate. I realise it is difficult to clearly set out predicted peak movements where seasonal fluctuations are applied however the information conveyed at the public exhibition in Aylesford did give the impression that the predicted vehicle movements would be considerably higher than those submitted in the application. Some clarification on this would be appreciated so that the percentage increase in HGV movements can be fairly assessed.

4.2 DHH: The environmental health issues raised by this application are:

- Possible site contamination;
- Noise from lorry movements to and from the site, from the operation of fixed plant and from activities within the site;
- Odour from the transport of sludge to and from the site, the sludge recycling process and the storage and removal of digested sludge;
- The impact, if any, on local air quality of the products of combustion of biogas in the flare stack and boilers. The Environmental Statement (ES) addresses contamination, noise and odour but not air quality impact.

4.2.1 *Possible Site Contamination:* The ES includes an evaluation of potential areas of contamination within the site of the proposed sludge recycling centre. A desk study and exploratory fieldwork have been used to develop a model of ground conditions at the site based on a source, pathway, receptor conceptual model. The investigation identified elevated carbon dioxide (CO₂) and reduced oxygen (O₂) levels within six gas monitoring boreholes. These represent a medium to high risk during the construction phase and to the occupiers of any proposed structures permanent or temporary. This risk will be managed, principally, by providing suitable ventilation within the new buildings.

- 4.2.2 *Noise*: The ES includes an acoustic appraisal which evaluates noise associated with the construction of the sludge recycling centre and noise associated with its operation. The appraisal makes use of appropriate sources of information and assessment criteria and drawing on these concludes that construction noise will have no significant impact and that operational noise levels will be modest, being less than the current ambient noise at the closest noise sensitive location. I concur with these conclusions.
- 4.2.3 *Odour*: The ES provides a summary of relevant guidance relating to the assessment and control of odour from Wastewater Treatment Works and drawing on this makes an assessment of odour emissions from the proposed development by means of the modelling of Hydrogen Sulphide emissions (as a surrogate for odour) and compares these to a standard of 5 total odour units per cubic metre of air $5\text{ouE}/\text{m}^3$. Based on this modelling the conclusion is drawn that odour arising from the combined operation of the existing wastewater treatment plant and the sludge recycling facility will not exceed the “standard” of $5\text{ouE}/\text{m}^3$ at any sensitive receptor outside the site boundary.
- 4.2.4 I have reservations relating to the standard of $5\text{ouE}/\text{m}^3$ adopted as an assessment criteria in the ES and the use of modelling which uses Hydrogen Sulphide (H_2S) as a surrogate for odour concentration. The document “*Odour Nuisance from Sewage Treatment Works – Local Authority Guide*” which forms part of the DEFRA “*Consultation on the draft Code of Practice and Local Authority Guide on Odour Nuisance from Sewage Treatment Works*” (draft CoP), December 2004 provides the following guidance relating to assessment criteria and modelling using H_2S :

Criteria:- Studies performed in Holland based on questionnaires and modelling, showed that 50% of the population is seriously annoyed by odour that exceeds $50\text{ouE}/\text{m}^3$ for >2% of the time (a 98-percentile concentration of $50\text{ouE}/\text{m}^3$) whereas 10% of the population are seriously annoyed whenever the 98-percentile odour concentration exceeds $2-10\text{ouE}/\text{m}^3$. In another study around 9 selected UK sewage treatment works it was found that they had received a total of 102 complaints due to odour. Over 50% of these came from areas where the estimated 98-percentile odour concentration exceeded $10\text{ouE}/\text{m}^3$. Only 3% came from areas where the estimated 98-percentile odour concentration was less than $5\text{ouE}/\text{m}^3$. These and other studies has led to a 98-percentile standard of $5\text{ouE}/\text{m}^3$ being proposed as satisfactory in Environmental Impact Statements prepared since the mid-1990s. The Dutch studies however proposed a 98-percentile concentration of $1\text{ouE}/\text{m}^3$ as a safe target figure for a new works, a value that has also been used at times in the UK.

The Environment Agency uses a different more refined approach for regulating PPC processes, setting a "benchmark" criterion of "no reasonable cause for annoyance". This is defined in numerical terms by an "indicative odour exposure standard" that takes into account the main factors determining the offensiveness of the odour, i.e. intensity (as concentration), pleasantness, duration and frequency. This requires that the 98-percentile concentration odour at the sensitive receptors remains at or below an odour concentration of between 1.5 and 6.0 ouE/m³ (depending on the unpleasantness of the odour). Agency guidance places wastewater treatment in the "highly offensive" category for relative unpleasantness, where the indicative odour exposure standard is 1.5 ouE/m³ as the 98-percentile. There is "no reasonable cause for annoyance" if this benchmark air quality criterion is met. Again, as stated earlier, this does not necessarily equate to no complaints. It is designed to be a level of odour exposure that a high proportion of the exposed population, with normal sense of smell finds "acceptable" on a long-term basis.

Modelling using H₂S:

*Hydrogen sulphide is often referred to as the cause of odour from sewage treatment works. Whilst H₂S may be a major component of the sewage treatment works odour cocktail, there are other compounds which cannot be ignored. Because it is relatively easy to measure, H₂S is often used as a target indicator for odour, i.e. it is used as a surrogate for odour concentration (as the latter cannot be measured quantitatively in units of ouE/m³ at ambient concentrations). However, it is recognised that H₂S is not a good indicator for industrial effluents, **secondary treatment odours** and dryers/incinerators as it is proportionally less important as an odorous component in these sources. Also, based upon observations, the odour threshold for a sewage treatment odour is frequently 5 - 10 times larger than the value that would have been predicted based upon the H₂S concentration alone. Therefore whilst it is a valuable indicative target pollutant, careful evaluation of data derived solely from H₂S measurements is essential. (My emphasis).*

4.2.5 The above information leads me to conclude that, whilst 5 ouE/m³ may have previously been accepted as a design target for odour assessment, current best practice would be to use a criterion of 1.5 ouE/m³. Had this been a greenfield site I would have advocated the application of 1.5 ouE/m³ criterion. However, in the case of a long established treatment plant I am, on balance, inclined to the view that it would be appropriate to "test" the acceptability of the proposed development by reference to a 5 ouE/m³ total odour emission standard for the combined odour emission from the existing works and proposed sludge recycling facility.

4.2.6 I am also concerned that use of H₂S modelling may have resulted in the underestimation of the potential for odour nuisance to be caused during the handling and removal of the stored digested sludge. The ES takes the view that this material is similar to compost and does not give rise to significant odour levels and concludes that it is neither possible nor necessary to include it within the odour control regime. The H₂S modelling exercise confirms this.

4.2.7 My understanding is that digested stored sludge has an odour potential of about 10,000 ouE/m³ and raw sludge between 100,000 and 2,500,000 ouE/m³. However, because the perception of odour intensity is logarithmic an odour of 10,000 ouE/m³ will still be half as intense as one of 100,000 ouE/m³ and a quarter as intense as one of 1,000,000 ouE/m³. Also, the DEFRA consultation advises that ammonia odours may be produced if stored sludge becomes re-wetted. Odours from this source would not be included in a model which predicts odour emission based on emissions of H₂S. **This leads me to believe that there is the real possibility that the handling and transport of digested sludge will cause odour nuisance**, particularly since no consideration appears to have been given to the potential for the stored sludge to become re-wetted and produce ammonia odours.

4.2.8 In my opinion greater attention needs to be given to the likelihood of odour emission from the stored sludge and consideration should be given to:

- covering it to prevent the ingress of rainwater;
- implementing some form of active management, perhaps the application of “air stripping” which I understand has in full scale trials resulted in reduced odour emission from stockpiled sludge.

4.2.9 *Emissions from the flare stack and boilers:* The flare stack and boilers will release combustion gases produced by the burning of biogas from the anaerobic digester. The principal pollutants will be carbon monoxide CO and oxides of nitrogen (NO_x). There are several dwellings at Corporation Cottages that are effectively within the site and I am concerned to safeguard the air quality of the residents of these properties. The ES does not address this aspect.

4.2.10 The applicant should be required to submit an air quality assessment to evaluate combustion emissions from the flare and boilers that:

- identifies the key pollutants;
- identifies the emission rates of the pollutants;
- identifies sensitive receptors;
- predicts the concentrations of the various pollutants at the sensitive receptors;

- relates the predicted concentrations to relevant air quality standards.

4.2.11 Conclusion: In my opinion the application should not be determined prior to the receipt of a satisfactory air quality assessment and submission of an odour management plan which specifically addresses the mitigation of odour from the storage, handling and transportation of digested sludge.

Responses forwarded by KCC:

4.3 Jonathan Shaw MP: The effects of the proposal will be felt most by the residents of Eccles due to the increased lorry movements along Bull Lane. If built as planned, there will be up to 64 lorry movements per day when the site is fully operational in March 2009. Southern Water says that the sludge carried by the lorries will be sealed and therefore unpleasant odours will be minimal.

4.3.1 I recognise that sewage works are a necessary requirement, however, their location needs to take account of local transport links. I am very concerned, as I know others are, about the safety of substantially increased lorry movements along Bull Lane. Based on the current information made available to me, I cannot support the plans and raise objections.

4.4 PC: Strong Objections to this expansion project based on the current proposals for transport arrangements and the effect these would have on the village of Eccles. The PC wishes to see the re-opening of the alternative rear access situated to the west of the site considered. The re-opening of this access could be considered in line with other site developments proposed by SCA. The expansion of the WTW should not be opened until the new Court Road/Burham bypass is created with the new proposed river crossing.

4.5 EH: No comment.

4.6 EA: Although there is no objection to the proposed expansion at this location, the EA objects to the use of soakaways.

4.6.1 As identified within the submitted Environmental Report, the site lies within a vulnerable area in terms of Groundwater Protection (overlying a major aquifer within Source Protection Zones II and III). Furthermore, the depth of the groundwater has been identified as being approximately 2-3 metres below ground level.

4.6.2 In order for soakaways to be a viable option at any location, a satisfactory unsaturated zone must be present between the invert level of discharge and the groundwater table. In this instance, any discharge via soakaways will be a direct discharge to groundwater, controlled water, which is not acceptable. Alternative methods for the disposal of clean, uncontaminated surface water must therefore be sought and implemented.

4.6.3 It is also noted that parts of the existing site are to be either be infilled or demolished as part of the expansion project. The duty of care regulations for dealing with waste materials is applicable for any off site movements of wastes.

4.6.4 The agency does have some concerns if this proposal goes ahead that there is the potential for ammonia concentrations in the final effluent from the sewage works to cause deterioration of receiving controlled waters. If the proposal goes ahead the Agency will apply a numeric ammonia standard to the consent, set at a level determined by the Agency to ensure no deterioration to the quality of the receiving water body, the tidal River Medway takes place.

4.7 EN: No objection subject to condition regarding mitigation regarding to slow worms

4.8 KWT: No objection subject to imposition of mitigation conditions.

4.9 South East England Regional Assembly: Development does not materially conflict with or prejudice the implementation of current regional guidance on waste.

4.10 Private Reps: 455 letters have been received from local residents, objecting on the following grounds:

- Increase in lorry movements on Bull Lane through Eccles;
- Hazardous to pedestrians crossing Bull Lane in Eccles;
- Bull Lane is not suitable accommodate the increase in HGV movements;
- Development will lead to contamination;
- Detrimental impact on the residents of Eccles;
- Sealed lorries still produce odours;
- Increase in noise and vibration pollution;
- Poor existing access to sewage works;
- The Bull Lane and Pilgrims Way junction is poor;
- What about alternative sites;
- Residents park cars along Bull Lane, restricting the width of the road down to a single carriageway;
- Why not use access through the Island site;
- A new road should be crossed to Rochester Road avoiding Eccles;
- Smells and odours will be harmful to the locality and local residents.

5. Determining Issues:

- 5.1 The main issues to be considered are whether the proposal will detract from the visual amenity of the locality, whether it harms the residential amenity of nearby properties and whether it constitutes a highway hazard.
- 5.2 The proposed expansion and improvement works are to an existing Sludge Recycling Centre within the Aylesford Wastewater Treatment Works. The proposed development is to be carried out on previously developed land and does not exceed the extent of the treatment works. The principle of redevelopment of an existing treatment works site in this rural location is not opposed.
- 5.3 The proposed new Sludge Recycling Centre will include a large number of new buildings and structures and is intended to upgrade Aylesford to become a central location for the recycling of sludge in West Kent. The applicant has been through a process of elimination of alternative sites, such as Ham Hill, Edenbridge, North and South Tunbridge Wells and Bidborough. The applicant considered Aylesford was most suitable for West Kent as it lies *“within the catchment that produces most indigenous sludge, locating a Sludge Recycling centre at Aylesford will involve the least number of vehicle movements overall, in terms of the import of sludge. Furthermore, the Aylesford site is large enough to accommodate future improvements to the sludge treatment process and the Wastewater Treatment Works if required”*. Whilst the Borough Council acknowledges the need for improved facilities, the choice of Aylesford and whether the alternative sites assessment is accurate is ultimately a matter for KCC determine.
- 5.4 The application site is relatively well screened from public vantage points in most directions. The new buildings will introduce a number of taller buildings onto the site, but given that the site is located at a relatively low point in the landscape and partially screened by existing bunds and vegetation, the visual impact will be limited. The applicant is also proposing to introduce additional tree planting within the site that will help to minimise the visual and landscape impacts further. The proposed development will not significantly detract from the visual amenity of the locality.
- 5.5 The applicant is seeking to improve the vehicular access onto Bull Lane by widening the access to assist manoeuvrability and visibility for vehicles entering and exiting the site. New road markings are also proposed by introducing a ghost island to provide additional roadspace for turning vehicles. The Chief Engineer does not oppose these improvements to the junction. In visual terms, the widening of the junction will not significantly detract from the visual amenity of the locality.
- 5.6 The applicant considers that the development will not have an adverse impact on the functioning of the Bull Lane/Pilgrims Way junction. However, the Chief Engineer considers that this is a poor junction due to its geometry, particularly for HGV movements, due to sight lines. Whilst the proposed Peters Village

development would (once implemented) improve the pedestrian crossing at this junction, it does not alter the junction for other road users. The Chief Engineer is concerned as to whether this junction can cope with additional HGV movements.

5.7 The most significant objections from local residents relate to the increase in traffic movements and associated highway hazards within Eccles. In particular, pedestrian safety and the problems of on street parking, resulting in a single lane, are highlighted. The current traffic movements associated with the site are as follows:

- 15 average daily visits by light vehicles;
- 15 average daily visits by HGVs;
- 43 maximum daily visits during sludge export.

Whilst the proposed upgraded site would result in the following traffic movements:

- 19 average daily visits by light vehicles;
- 32 average daily visits by HGVs;
- 63 maximum daily visits during sludge export.

5.8 These figures indicate that there will be more than a doubling of the daily visits by HGVs to the application site. This is a significant increase in the context of the existing use and I understand the local residents' concerns over this increase. However, in formulating its response to the County Council, I believe it is appropriate for the Borough Council to assess whether there is capacity to accommodate these additional traffic movements and whether the increase will result in hazardous highway conditions.

5.9 Whilst the applicant considers that Bull Lane can accommodate the additional traffic movements, I have reservations that Bull Lane is suitable for the extra HGV movements. The Borough Council opposed applications involving increased traffic movements associated with this site as long ago as the early 1990s. In particular, on planning application TM/93/1031, which was refused by KCC on highway grounds, the Borough Council objected on the grounds that "*the highway network which serves the site is inadequate to accommodate satisfactorily the additional Heavy Goods traffic*". The Chief Engineer has highlighted the unsatisfactory highway conditions along Bull Lane, and has reservations over pedestrian safety, parking patterns and the geometry of the Bull Lane and Pilgrims Way junction. Therefore, I am not satisfied that the existing inadequate highway network is capable of accommodating additional HGVs without resulting in hazardous highway conditions.

- 5.10 I note a number of local residents have suggested alternative means of access to the application site, either through the SCA Island Site and up onto Court Road or alternatively through the creation of a new road across the sand pits linking to Rochester Road to the west of Eccles. However, neither of these options form part of this application and they are not for consideration.
- 5.11 The increase in traffic movements through Eccles will also have an impact on the residential amenity of the properties fronting onto Bull Lane. A large part of the objections from local residents also relates to the detrimental impact of the increased HGVs passing their properties and creating noise disturbance and vibration. The applicant has addressed noise and vibration arising from the activities carried on within the site, which the DHH does not oppose. The Environmental Report states that there will be a modest impact on residential properties through the operational use of the site. I would again refer to applications from the 1990s, where KCC supported the Borough Council's opposition to increasing the size of vehicles visiting the site, and the refusal of application TM/93/1031 on the basis that the proposal "*would lead to an unacceptable level of impact on local residential and related amenities*". Members will note that the applicant is seeking to increase the number of HGV movements on an average daily basis to 32, which is substantially above the 8 large tankers postulated in the 1993 application. Given this significant increase in movements, the proposed development will have a detrimental impact on the amenity of the local residents along the route of the HGVs.
- 5.12 Strong objections have also been raised regarding the odours from the proposed development and when lorries leave the site during the sludge exportation season. The DHH has assessed the odour control proposals and on balance accepts that due to this being an existing treatment works the 5 ouE/cubic metre standard, that this is an appropriate odour control standard. However, the DHH has reservations over the handling and removal of the stored digested sludge, which will potentially cause odour nuisance, if it becomes re-wetted resulting in ammonia odours. The DHH suggests that an odour management plan is required for storage, handling and transportation of digested sludge.
- 5.13 The DHH also raises concerns over air pollution from the proposed flare stack and boilers, as they will produce carbon monoxide (CO) and oxides of nitrogen (NOx). No assessment of these impacts is included within the application. This is of particular concern as there are residential properties in very close proximity to the site. Assessment of air pollution is essential.
- 5.14 Finally, matters of nature conservation, alternative means of surface water drainage and quality of water could be controlled by condition to meet KWT, EA & EN's concerns.
- 5.15 In light of the above considerations, I am unable to support this proposal and recommend that the Borough Council raises objections.

6. Recommendation:

6.1 **KCC be advised that the Borough Council raises strong objections** to the application as detailed by letter dated the 7 December 2005, Part 1 - Planning Applications Forms and Drawings and Part 2 - Supporting Statement and Environmental Report for the following reasons:

- The local highway network of Bull Lane through the village of Eccles and at its junction with Pilgrims Way is inadequate to accommodate the significant increase in Heavy Goods Vehicles without resulting in hazardous highway conditions for road users and pedestrians;
- The increase in traffic movements will result in significant disturbance and harm to the residential amenity of the properties fronting onto Bull Lane;
- The proposed handling, storage and transportation of the digested sludge will result in odour nuisance unless an appropriate management plan can prevent the re-wetting of sludge and resultant production of ammonia;
- The proposed development will result in adverse air quality for the residents of Corporation Cottages.

6.2 In the event that KCC **Approve** the application, the Borough Council would the following matters to be covered by condition:

- Nature conservation mitigation strategy for dealing with slow worms;
- Odour management programme;
- Air quality appraisal of boiler and flare stack;
- Details of surface water drainage;
- Landscaping;
- Restriction the number of HGV movements per day.

Contact: Aaron Hill