Our ref: MT/020412/K1.P
05 April 2012

County Planning, Transportation and Environment Officer
Northamptonshire County Council
PO Box 221
John Dryden House
8-10 The Lakes
Northampton
NN4 7DE

FAQ: Mr G P Watson

Dear Sir

**PLANNING PORTAL REFERENCE 1901881**
**PROPOSED USE OF THE FORMER GREEN WASTE COMPOSTING FACILITY FOR COMPOST MATURATION AND PRODUCT STORAGE. KILSBY LANDFILL SITE, GROVE FARM, DAVENTRY ROAD, KILSBY**

I refer to the above planning application submitted via the Planning Portal. This online submission comprises the appropriate application forms and certificates, drawing no. K3031000, and this covering letter.

The application fee has been calculated as being £1690, which is the maximum fee for developments falling under category 9: "The carrying out of any operations not coming within any of the above categories". A cheque for this fee has been sent by post.

**Background**

Planning permission was granted for the Kilsby green waste composting facility on 10th June 1999. The facility was operational for some ten years until the permission expired on 31st December 2009. Although there has been no further green waste composting at the site, the hard standing, building and the associated infrastructure that was constructed in accordance with the requirements of the permission are still on site. The Environmental Permit for the site (number 73018) is still in place.

**Biffa’s In Vessel Composting Operations**

Biffa operate two in vessel composting facilities located at Ufton Landfill site near Leamington Spa, Warwickshire and Etwall in South Derbyshire. The operations at these facilities comprise the sterilisation and composting of mixed green waste and food waste in enclosed tunnels prior its maturation in the open, on a concrete pad, for a period of up to 6 weeks.

In accordance with the requirements of the Animal By-products Regulations 2005, material in the tunnels is required to reach a certain standard before it can be moved into the open for maturation. To date, in order to achieve the required standard the material has been retained in the tunnels for approximately 2 weeks.
We have carried out a number of tests in consultation with the State Veterinary Service who enforce the Animal By-Product Regulations and have demonstrated that we can achieve the required standard by retaining the compost in the tunnels for significantly less time than was originally thought necessary. As a result of this, we are now able to process up to twice the volume of material through the tunnels than anticipated whilst still achieving the required standard. Clearly this is of significant benefit in recycling more green waste and food waste through the plant thus moving waste management practices further up the waste hierarchy.

Both the Etwell and Ufton sites were designed with compost maturation pads sized for inputs based on a two week retention time in the tunnels. Clearly if we are able to process twice as much waste through the tunnels then there will also be twice as much material requiring maturation and storage. This is now the controlling factor on throughputs at the two sites. In order to increase the throughputs at Ufton and Etwell, Biffa needs to find an alternative off site location for the maturation and storage of the generated compost and Kilsby has been identified as a suitable site for this purpose.

The Proposed Development

It is proposed that that the existing concrete pad at Kilsby be used for the maturation and storage of imported compost awaiting sale and export. The planning application boundary and the land under the applicants control are shown on Plan reference K3031000.

Compost material for maturation and storage will be delivered into the site via the existing site entrance on the Daventry Road. It is anticipated that approximately 25 vehicles will visit the site each day to deliver compost for maturation and to remove product from the site for sale. This equates to approximately 50 vehicle movements per full working day.

Maturing compost will be stored in windrows approximately 4m high. The compost will not be turned during the period of maturation but once maturation is complete and a saleable material generated then this will be screened on site, within the planning application boundary prior to export from site to customers. The only mobile plant on the site will be the screen and a loading shovel. There will be no fixed plant.

The site will open for the acceptance of compost and the export of product on Mondays to Fridays from 0700 to 1800 and on Saturdays from 0700 to 1300. The site will not open on or operate on Sundays or Bank Holidays. These hours are the same as the hours on the previous planning permission for green waste composting at the site.

Planning History and Planning Policy

The Kilsby site has a long history of waste related uses. A number of planning permissions for landfill have been granted, the most recent of which expired on 31st March 2009 (DA/2008/0845). The site has not accepted any controlled wastes since that date and is now in aftercare.

The site has also been used for green waste composting most recently in accordance with planning permission DA/99/023C. The consent expired on 31st December 2009 although the site infrastructure associated with the permission is still in place.
The Kilsby site has been identified in the Northamptonshire Minerals and Waste Development Framework - Locations for Waste Development at Policy W4 as a site that is potentially suitable for a waste related use in the rural area.

Potential Environmental Effects

Traffic:

It is anticipated that approximately 25 vehicles will visit the site each full working day associated with the delivery of compost for maturation and storage and the export of product to customers.

The sole access to the site is located on the A361 Daventry Road and has good visibility in both directions. The access was used until December 2009 for the importation of waste and restoration materials as part of the former landfill and green waste composting operations. It is considered that, given the low key nature of the operation, it is unlikely that the proposed development will result in any significant impact on the traffic or the local highway network.

Noise:

The Kilsby site is located in a rural area. The closest residential property to the site is Grove Farm located approximately 300m from the application area. This property is unoccupied. The next nearest property is Pavilion Lodge on the A361 approximately 800m from the application area and on the opposite side to the former landfill site.

The only potentially noisy activities that will be carried out on site are the screening of matured compost and the loading and unloading of delivery and collection vehicles. Given the distance of between the application site and the nearest occupied residential properties it is considered unlikely that noise from the operation will cause any unacceptable impact.

Visual Impact:

The application area is not visible from outside of the site and the operations are therefore unlikely to result in any visual impact. Footpath EN2 passes close to the site and this will be preserved and maintained for duration of the compost storage and maturation operations. Users of the footpath will be able to see into the site however this is a low key operation that will have the visual appearance of soil storage and not unlike the normal operations that can be seen on any agricultural land in the rural area. It is considered that the proposed development will not have a significant visual impact on the users of footpath EN2.

Dust:

The only operations that will be carried out on site that could produce dust are the passing of vehicles over the site access road, screening of matured compost, and the unloading of compost loading of product onto vehicles. Given the remote rural location, the low key nature of the proposed development and the distance between the application area and the nearest residential properties it is considered unlikely that there will be any impact from dust outside of the site. No screening or loading and unloading of compost will be carried out when members of the public are passing adjacent to the site on footpath EN2.
Odour:

Maturing compost is not particularly malodorous. Odour generation at green waste open windrow composting facilities is usually associated with turning of compost. As the Kilsby site will only be used for maturation and storage, there is no intention to turn the materials whilst they are on site. Some odour may be generated when the compost is first deposited on the concrete pad, but given the remote rural location of the site and the distance between the application area and the nearest residential properties it is considered unlikely that there will be any odour impact outside of the site. No screening or loading and unloading of compost will be carried out when members of the public are passing adjacent to the site on footpath EN2.

Groundwater and Surface Water:

The site has the benefit of the existing surface water drainage system. Surface water run off from the roof of the composting building drains to an existing surface water ditch that outfalls through a balancing pond into a local stream and is controlled by the Environmental Permit. All run off from the compost maturation and storage pad will be collected through a separate system and either recycled back into the compost or removed off site by tanker as trade effluent. No trade effluent will go to any surface water system. These measures will ensure that there is no pollution of the surface and groundwater systems as a result of the proposed development.

Conclusions

It is proposed that that the existing concrete pad at Kilsby be used for the maturation and storage of imported compost awaiting sale and export. The use of the Kilsby site will enable the company to collect and compost significantly more green and food waste through existing facilities at Ufton at Etwell thus moving the management of these waste streams up the waste hierarchy.

Until recently the Kilsby site has been used for both landfilling and green waste composting. The site is allocated in the Minerals and Waste Local Development Plan as a potential site in the rural area for a waste related development.

Given the low key nature of the development and the remote location of the site, it is considered unlikely that the proposed development will result in any unacceptable environmental impact.

I trust that I have provided you with sufficient information to be able to determine our planning application. However, should you need any further details or have any queries then please do not hesitate to contact me.

Yours faithfully
For Biffa Waste Services Ltd

Mary Tappenden
Assistant Planning Manager
Encs.
**Plans:**

I attach a 1:50,000 site location plan for your use. This shows the context of the site as you ask.

In terms of the intended layout, this will be as it is at the moment. I have attached a plan that was approved as part of the planning permission for the Green Waste Composting facility that shows the location of the building on the site and also the area of hardstanding. I also attach a drawing showing the elevations of the building. I would be happy for you to approve these plans as part of this application. We are not proposing any further building or engineering works as part of the current application. All of the compost on the site would be matured, screened and stored under the cover of the building. The remaining tarmac areas would be used for turning vehicles either delivering compost or removing product from the site. If you need anything different in terms of layout plans then please let me know and I will get something drafted. I have also attached the elevational drawings for the existing building.

**Waste Development Framework**

As you say, I have identified the site as being allocated in the Locations for waste Development document as part of the WDF.

In terms of the Core Strategy, the use of the Kilsby site for the maturation and storage of compost will enable us to increase the throughputs of material at our in vessel composting site at Ufton. This assists in moving the management of waste up the waste hierarchy, one of the underpinning aims of the Core Strategy. Whilst I appreciate that the Ufton site is not within Northamptonshire and is also in the West rather than the East Midlands, the distance between Ufton and Kilsby is only 18 miles so the number of road miles travelled in transporting the material for maturation and storage will be minimised. Given the short distance from Ufton to the Northamptonshire boundary and our ability to increase throughputs at Ufton, it is very likely that some of the wastes processed at the Ufton site could come from Northamptonshire in the future.

The core strategy includes a locational hierarchy with the Kilsby site being in the Rural Hinterlands. The site is identified at Policy W4 of the adopted Locations for Waste Developments DPD where sites within that policy are suggested as being suitable for waste uses such as composting or anaerobic digestion, such as has been on the site in the past. Maturation and storage of compost is wholly compatible with the allocation in the DPD.

**Odour**

You have raised a number of points on odour.

The shorter 1 week period in the tunnels does not give rise to the removed material being more odorous. Maturing compost does have a distinctive odour but this is no different to the odour released during green waste composting as was previously carried out on the Kilsby site. The odour tends to be released more during screening and this is why we have suggested that screening and loading would be stopped in the event that a member or members of the public are using the footpath. Stopping when the footpath is in use was a condition included on the previous green waste composting consent hence we have suggested it going forward with this proposal. In the past we have watched for pedestrians and temporarily stopped as they have passed and we will simply reinstate this requirement with our operatives.

Complaints regarding odour at the Ufton site are a rarity and we get no more than one or two a year. The key concern with maturing compost is to ensure that the material remains in an aerobic rather than anaerobic state. This is achieved by regular screening and ensuring that the material does not become waterlogged. Unlike at Ufton, the maturation at Kilsby will be under the cover of the building which will reduce water ingress and ensure that odour is minimised.
The only operation that releases odour is screening maturing compost and as I have set out above, provided this is done regularly and under the cover of the building this will not result in significant odour or nuisance outside of the site. I should add that this site has already operated as a Green Waste composting facility using the same building, operational methods and hardstanding area and without a record of odour complaints. The site is covered by an Environmental Permit which enforces controls over odour emissions from the site.

At Utton, we have an approved dust, bioaerosol and odour management plan through planning and I have attached this for your information.

With regard to the location of sensitive receptors, the Kilsby site is in a remote location hence its suitability for this type of operation. The remoteness is demonstrated by the 1:n0,000 plan attached to this email. I have identified the closest residential property to the site and we are confident that, as with the previous green waste composting facility, there will be no significant adverse environmental effects on the occupants of that property. As this is the closest property it follows that the same is true of other properties more distant from the site. The closest centres of population are at Kilsby and Ashby St Ledgers villages, both of which are over 1km from the site.

I trust that this information is helpful and that you are now in a position to validate the application and commence consultations. If it would help you to understand the operation further I would be happy to arrange for you to visit our Utton site for a tour.

Should you have any further queries then please do not hesitate to contact me.

Yours faithfully

Mary Tappenden
Assistant Planning Manager, Biffa Group

Biffa
Poplars Landfill Site, Lichfield Road, Cannock, Staffordshire, WS11 8NQ
Telephone: 0121 661 6733.
Mobile 07850 494589.
Biffa Waste Services Ltd
Ufton Recycling Facility, Ufton, Warwickshire

Dust, Bioaerosol and Odour Management and Monitoring Plan

Submitted in accordance with the requirements of Condition 8 of Planning Permission S1751/08CM021

November 2008

A) Introduction

This management and monitoring plan has been prepared to comply with Condition 8 of Planning Permission S1751/08CM021 dated 8th October 2008. This plan should be read in conjunction with the Environmental Permit issued by the Environment Agency. The activities taking place at the recycling facility have the potential to generate dust, odour and bio-aerosols. This plan describes the management methods that can be employed to prevent these issues becoming a nuisance.

B) Risks

1. Dust

Dust is defined as particulate matter in the size range of 1um to 75um in diameter. The dispersion or movement of dust particles is dependent upon the strength and direction of prevailing winds.

2. Bioaerosols

Bioaerosols around composting sites will comprise mainly of fragments of plant material and various microorganisms, mainly comprising bacteria, plant viruses, fungi and actinomycetes.

3. Odour

The volatile compounds released from decomposing waste material. Odour may sometimes be considered a nuisance if it can be detected beyond the site perimeter.

C) Sources

1. Dust

Dust can be generated from the following activities:

- 1. The Reception and storage of waste;
- 2. Vehicle movement over hard surfaces
- 3. Shredding and transfer of waste feedstock;
- 4. Composting and compost turning.
- 5. Screening and transfers of material within the site.
- 6. Windblown dust from surfaces
- 7. Product storage, loading and transport
2. Bioaerosols

The main source of bioaerosols will be:

1. Reception and storage of organic waste;
2. Shredding and transfer of composting feedstock to the tunnels;
3. Removing compost from the tunnels;
4. Composting and compost turning.
5. Post-composting screening and transfers across the Composting Yard

3. Odour

Inorganic waste materials delivered to the recycling facility will not generate odour however organic waste can start to decompose and produce odour which requires control before it is processed on site.

The main source of odour will be:

1. Reception and storage of organic waste;
2. Shredding and transfer of composting feedstock to the tunnels;
3. Removing compost from the tunnels;
4. Composting and compost turning.
5. Post-composting screening and transfers across the Composting Yard
6. Leachate collected from tunnels
7. Leachate collected from maturation pad

D) Dust, Odour and Bioaerosol Control

The plans focus on a two-stage approach to control.

Techniques and methods to be utilised will be deemed either Essential or Supplementary.

Essential methods and techniques are those deemed imperative to the continued and ongoing management of the site, ensuring that dust, odour and bio-aerosols are not emitted that may be considered detrimental to the local community.

Supplementary items are those that will not be required at all times or during normal operating conditions, they will be specific controls employed following on site evaluation of essential methods and techniques where current controls are deemed inadequate.

Dust is considered in Plan 1. Odour and bioaerosols are considered in Plan 2.
### 1. Dust Management Plan

<table>
<thead>
<tr>
<th>Management Area</th>
<th>Method/Technique</th>
<th>Essential</th>
<th>Supplementary</th>
</tr>
</thead>
<tbody>
<tr>
<td>Dust Control – 1.</td>
<td>Access routes to be swept or dampened with water via tractor and bowser or suitable alternative during dry conditions.</td>
<td></td>
<td>√</td>
</tr>
<tr>
<td>Dust Control – 2.</td>
<td>Dry compost to be dampened during shredding, turning or screening operations</td>
<td></td>
<td>√</td>
</tr>
<tr>
<td>Dust Control - 3.</td>
<td>Provision of adequate water resources made available all times.</td>
<td>√</td>
<td></td>
</tr>
<tr>
<td>Waste Acceptance – 1.</td>
<td>All waste streams of a potential dusty nature shall be clearly identified at the weighbridge</td>
<td>√</td>
<td></td>
</tr>
<tr>
<td>Waste Acceptance – 2.</td>
<td>Upon delivery to the site all wastes are checked for their acceptability</td>
<td></td>
<td>√</td>
</tr>
<tr>
<td>Waste Acceptance – 3.</td>
<td>Waste will only be deposited within an enclosed reception building</td>
<td></td>
<td>√</td>
</tr>
<tr>
<td>Waste Treatment – 1.</td>
<td>Doors to reception building to be kept closed during waste processing</td>
<td>√</td>
<td></td>
</tr>
<tr>
<td>Dust Monitoring – 1.</td>
<td>Daily visual dust monitoring when site operational</td>
<td></td>
<td>√</td>
</tr>
<tr>
<td>Complaint Handling and Investigation – 1.</td>
<td>Complaints received directly to the site will be investigated immediately. Biffa quality procedures will be followed.</td>
<td></td>
<td>√</td>
</tr>
<tr>
<td>Complaint Handling and Investigation - 2.</td>
<td>Results from complaints investigations shall be reviewed and actions taken as necessary</td>
<td></td>
<td>√</td>
</tr>
<tr>
<td>Complaint Handling and Investigation – 3.</td>
<td>Complaints received via authorities will be investigated subject to the timescale of the complaint. All details will be logged as per CHI-1</td>
<td></td>
<td>√</td>
</tr>
<tr>
<td>Public relations – 1.</td>
<td>Regular liaison meetings with local authorities and organisations</td>
<td></td>
<td>√</td>
</tr>
<tr>
<td>Review – 1.</td>
<td>The dust control plan to be constantly reviewed to ensure it reflects current site activities</td>
<td></td>
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</tr>
</tbody>
</table>


## 2. Odour and Bioaerosol Management Plan

<table>
<thead>
<tr>
<th>Management Area</th>
<th>Method/Technique</th>
<th>Essential</th>
<th>Supplementary</th>
</tr>
</thead>
<tbody>
<tr>
<td>Odour Control – 1.</td>
<td>Containment of odours and bio-aerosols within enclosed building</td>
<td></td>
<td>✓</td>
</tr>
<tr>
<td>Odour Control – 2.</td>
<td>Processing of waste within 24 hours</td>
<td></td>
<td>✓</td>
</tr>
<tr>
<td>Odour Control - 3.</td>
<td>Air extraction and treatment from IVC building and compost tunnels</td>
<td></td>
<td>✓</td>
</tr>
<tr>
<td>Odour Control – 4.</td>
<td>Maintaining aerobic conditions during composting process.</td>
<td></td>
<td>✓</td>
</tr>
<tr>
<td>Waste Acceptance – 1.</td>
<td>All waste streams of a potentially odorous nature shall be delivered in enclosed vehicles</td>
<td></td>
<td>✓</td>
</tr>
<tr>
<td>Waste Acceptance – 2.</td>
<td>Upon delivery to the site all wastes are checked for their acceptability</td>
<td></td>
<td>✓</td>
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<td>Waste Acceptance – 3.</td>
<td>Waste will only be deposited within an enclosed reception building</td>
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<td>✓</td>
</tr>
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<td>Waste Treatment – 2.</td>
<td>Positive air extraction from building and compost tunnels to scrubbers and bio filter</td>
<td></td>
<td>✓</td>
</tr>
<tr>
<td>Waste Treatment – 3.</td>
<td>Maintain scrubbers and biofilter in good working order</td>
<td></td>
<td>✓</td>
</tr>
<tr>
<td>Waste Treatment – 4.</td>
<td>Utilise indoor dust suppression and odour absorption / masking equipment</td>
<td></td>
<td>✓</td>
</tr>
<tr>
<td>Waste Treatment – 5.</td>
<td>Utilise portable odour treatment equipment outside</td>
<td></td>
<td>✓</td>
</tr>
<tr>
<td>Waste Treatment - 6</td>
<td>Management and Control of leachate</td>
<td></td>
<td>✓</td>
</tr>
<tr>
<td>Weather Monitoring – 1.</td>
<td>Daily weather monitoring including wind direction, wind speed, and rainfall</td>
<td></td>
<td>✓</td>
</tr>
<tr>
<td>Odour Monitoring – 1.</td>
<td>Daily olfactory odour monitoring at site perimeter when site operational</td>
<td></td>
<td>✓</td>
</tr>
<tr>
<td>Bio-aerosol monitoring – 1.</td>
<td>Annual bio-aerosol monitoring for Mesophilic bacteria (Total Viable Count) and Aspergillus fumigatus Spp.</td>
<td></td>
<td>✓</td>
</tr>
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