

18 January 2017

Mrs Felicity Webber  
Planning Department  
Lincolnshire County Council  
Witham Park House  
Waterside South  
LINCOLN  
LN5 7JN

Ref: PL/0125/16

Dear Mrs Webber

**Re: PROPOSED WASTE TRANSFER FACILITY – LONG LEYS ROAD, LINCOLN**

We are writing on behalf of residents and businesses near the proposed Veolia Waste Transfer Plant.

25 years ago, the location we now live in was the outskirts of Lincoln. Turn the clock forward to 2017. The Lincoln City ‘urban village’ on Long Leys Road is a thriving community. Hundreds of people live over here in homes planned and built over the last 20 years, with so many young families that our local schools have expanded to meet demand. So this proposal to significantly expand the Veolia site and change its use to a Waste Transfer Station has come as a huge shock to the local community.

We wish to register our opposition to the scheme on the basis of the following criteria, with reference to your Planning Guidance Note Number 9:

#### **LAND USE**

##### **The planning application does not accord with the City of Lincoln Local Plan 1998**

- The designated use class in policy 67A (Existing Allocations for Business & Industry) for land north of Long Leys Road is B1 – office and small scale industrial. The proposed facility would fall under use class B2 – general industrial.
- The site is adjacent to contaminated land (policy 38A) and a former landfill site (policy 38B). No assessment or investigation has been carried out and nor have Veolia submitted mitigation proposals.
- The scheme does not fulfil the criteria laid out in policy 38D (Environmental Pollution arising from Development Proposals).
- The scheme does not fulfil the criteria laid out in policy 104 (Long Leys Urban Village).

##### **The proposals do not satisfy the criteria laid down in Lincolnshire Minerals and Waste Local Plan – Core Strategy and Development, Management Policies, June 2016**

- The site is not on or close to an A Class road.
- The facility would result in an increase in dust, noise, light pollution and traffic and would harm the amenity of nearby residents.
- The proposal would not contribute positively to the character and quality of the area, and would be visually intrusive to the landscape and townscape.

- The proposals do not fulfil the criteria laid out in policies DM3, DM6, DM13, DM14 and DM17.

### **The proposals contravene the National Planning Policy Framework**

- Policy 17 – empowering local people to shape their surroundings. There has been a lack of consultation and engagement by Veolia, and an absence of joint working and co-operation to address what is clearly far more than a local issue. Our concerns over Veolia’s failure to actively engage and consult with the community are outlined later in this letter, and this lack of openness is wholly at variance to the approach outlined in their supporting statement.
- Policy 109 – the scheme would not conserve and enhance the natural environment and is not comparable with the surroundings. The development would adversely affect existing development as a result of unacceptable air and noise pollution.
- Policy 120 – the development should be appropriate for its location. The proposals do not take account of 13 Eco houses built over 3 years ago, just over 100m to the north of and downwind of Veolia’s site. No account has been taken of these houses in Veolia’s specialist noise and odour assessments accompanying their supporting statement, which is therefore invalid; the open-fronted waste input bays will face these properties. The inaccuracies and errors in Veolia’s submission are contrary to your own Planning Guidance Note No 2.
- The proposed plans do not indicate or take account of land to the rear of and forming part of 54 Long Leys Road, directly abutting the development site, again contrary to your own Planning Guidance Note No 2.
- The proposals will result in a waste treatment facility in very close proximity of a food processing plant, with associated environmental implications.

### **PHYSICAL IMPACT**

#### **The planning application does not accord with the City of Lincoln Local Plan 1998, policy 34 (Design & Amenity Standards)**

- The scale, massing and height of around 12m do not complement the architectural style and townscape character of the locality, and will dwarf neighbouring light industrial premises and immediately abutting housing bordering the southern boundary.
- The physical and functional relationship to adjoining buildings and streetscape will not be satisfactory.
- The boundary treatment and landscaping will not result in a high level of visual amenity.

### **TRAFFIC**

#### **There are safety implications associated with traffic movements into and out of the site**

- The shared access road is narrow, sightlines are poor, the site entrance directly faces houses and parked cars and Long Leys Road is not wide enough at this point for two HGVs to pass.
- The proposed junction design alterations do not remove the need for HGVs entering the site from the north to manoeuvre beyond the centre of Long Leys Road to turn into the site.
- The proposed junction design alterations do not allow HGVs to enter and leave the site entrance off Long Leys Road simultaneously, which is of major concern with reference to the proposed numbers of additional vehicle movements, the clash with other existing access road users (Travis Perkins and Curtis’s) and the implications for traffic flow on Long Leys Road.
- Traffic already backs up along Long Leys Road during peak periods and there is all day traffic congestion on Yarborough Road.
- The access road crosses a public footpath used by children.

- Veolia have responded to LCC Highway's request to alter the design of the junction of the Albion Works site with Long Leys Road by a proposal to widen the access road and increase the radius of the kerbs, requiring encroachment on to land which Veolia do not own.
- Veolia's RCVs associated with their current operation have been noted to speed down Long Leys Road, setting off the 30mph flashing sign.

## **COMMUNITY**

**The facility would result in an increase in dust, noise, light pollution and traffic and would harm the amenity of nearby residents.**

Our research reveals the following concerns in the local community:

- The nearest residents already suffer from bad odours, reverse beeper alarms from early morning to late evening and loud thuds as skips and containers are moved and dropped. The major escalation in the scale of Veolia's operation will severely exacerbate the situation. Veolia have frequently failed to respond to complaints from adjacent owners, which doesn't instil confidence for community relations if the new plant is approved.
- The specialist noise assessment is based upon Monday to Saturday working and not 24 hour/7 day working. If permission is granted there is nothing to prevent Veolia from working around the clock; even now there are vehicle movements from as early as 5am.
- The nuisance associated with reverse "beeper" type alarms for RCVs, as opposed to on-site plant, has not been considered in the supporting statement or noise report. This is a major source of noise pollution and can carry for a considerable distance on the prevailing wind.
- In their supporting statement Veolia have used wording such as mitigate, assist or help, not prevent or eliminate. They have not provided adequate information to demonstrate that odour release has been addressed. An odour management plan is required by reference to Environment Agency guidelines, supported by odour modelling.
- Veolia have not stated which Environmental Permit will be sought and nor have they defined the waste codes to be accepted at the site including tonnages. Waste materials allowed under an Environmental Permit have high odour potential.
- Veolia have proposed we visit their Southwark facility to allay concerns, which is not comparable with Lincoln, being located in an inner city mainly industrial area, with little nearby housing. Southwark was designed as a negative pressure building to prevent escape of odours; the proposal for Lincoln is the use of odour suppression sprays. The Southwark building includes rapid closing doors; the Lincoln plant will be open-fronted.
- Veolia have failed to take account of light pollution from exterior lighting and the adverse impact on the adjacent dwellings bordering the southern boundary and the Eco houses.
- There is no detailed drainage design scheme to address the risk of flooding from foul sewerage downstream and in support of Veolia's surface water strategy/flood risk assessment.
- There is a major water main and large surface water drain passing under the access road into the site, vulnerable to damage and with the consequent risk of flooding and contamination, particularly affecting Oakleigh Terrace (set down below pavement level on the west side of Long Leys Road) in the event of leakage or rupturing caused by HGVs.

## **PUBLIC CONSULTATION**

The derisory offer of a local meeting with residents to be held on 26th January 2017, some 11 days before the planning decision is due to be taken sums up the attitude taken by Veolia to Lincoln people. This multinational company, who sees itself as offering market leading services in their sector, failed to plan to talk to us.

Last April, 10 months ago, Veolia began to discuss their proposals in outline form with the planning authority. In October 2016 they formally submitted their application. In November 2016 they refused to attend a public meeting organised by residents. They have not done a mail drop to local residents or tried to communicate properly at all. Throughout the planning process they have given scant regard to what people in the area will think and feel about the expansion of industrial processes in our urban village. They have not cared about the worries young families have about their children walking to school, or the concerns about the quality of life for people in houses adjacent to their site. They have behaved as though we do not matter.

In December 2016 the company realised their duty to properly consult. Following apologies for not attending meetings or talking to local people, they offered a visit to a state of the art recycling centre in Southwark, technically far removed from the plant they propose to build in Lincoln. We don't know of anyone who has visited it – why would we? It is not what they plan to do here.

We are concerned about the lack of transparency Veolia continue to show us. The sort of plant they plan for this site has been built elsewhere. For example in the Brighton area, at Hollingdean: 8 years after building, the community have ongoing concerns and problems. So this is not the sort of plant the company will be able to build here and enjoy its peaceful running for years to come – put it in the wrong place and it will spoil the area, diminish the quality of life and therefore be the source of a lot of public relations work, regulatory complaints and general unrest.

We have hundreds of voices, and would give you many different nuances of opinion. But we are wholly united in our conclusion: please don't allow this waste transfer plant to be built here.

Yours sincerely,

Alex Rosen  
Joanne Mead

For and on behalf of residents and businesses affected by Veolia's proposals, including:

Alex & Sue Rosen – Long Leys Road  
Joanne Mead & Andy Campbell – Granelly Close  
Ben & Rachel Hill – Long Leys Road  
Chris Hobbs – Albion Crescent  
Emma & Paul Olivier-Townrow – Long Leys Road  
Sean Mowle and Susan Kernachan – Albion Crescent  
Chris Taylor – on behalf of the residents of the thirteen Eco-homes in Albion Close  
Megan Cox – Oakleigh Terrace, Long Leys Road  
Mick & Karen Mayfield – Oakleigh Terrace, Long Leys Road  
Ken & Pauline Bell – Oakleigh Terrace, Long Leys Road  
Justin Bell – Mitchell Drive  
Curtis of Lincoln Ltd – Long Leys Road  
Travis Perkins – Albion Works, Long Leys Road  
Bodytec Accident Repair Centre – Albion Works, Long Leys Road  
Mawers Farm – Long Leys Road  
Urbanmoto Ltd (Jenny & Jamie Masterman) – Albion Works, Long Leys Road

