

Development Control Team  
Cumbria County Council  
County Offices  
Busher Walk  
**KENDAL**  
LA9 4RQ

5th July 2016

Dear Sir/Madam,

Application Number: PL\1572\05 (1/16/9005)

Last night my wife and I attended a presentation informing us about the above proposed development close to our home on Lowry Hill, Carlisle. It is not overstating it, to say we were both shocked and appalled to see and hear what is proposed ... as, I think, were all who attended this crowded meeting. As one would expect, several representatives of the company involved; but astonishingly, no-one representing Cumbria County Council felt able to address the meeting. Yet it was Cumbria County Council's role in this unfolding situation that was clearly the cause of most consternation.

Consequently, we are writing to formally submit our profound objections in the strongest of terms, for the reasons expressed below.

The main cause of our astonishment and consternation was to discover that ***the site in question was ever deemed suitable for such a massive development of this nature in the first place.*** The main company representative seemed somewhat sympathetic to the Lowry Hill residents, and was keen to emphasise that the company was ***not*** responsible for the choice of site. That was down to the Cumbria County Council. Regrettably, as I say, there was no representative of Cumbria County Council able or willing to verify, deny or defend this. If it is true, the community of Lowry Hill may well feel, as we do, that it has been done a great disservice by our elected representatives (or their agents), who ought to have recognised quickly that this proposed site is completely inappropriate. At one point in the meeting it was stated that the offending 'Site Allocations Plan' had actually been abandoned due to the government's new development plan system. In which case, this planning application should be quickly refused, and the site rapidly reconsidered.

Although the proposed site is described as being on 'Kingstown Industrial Estate', that gives a ***very*** misleading impression. In reality, it is located on the edge of that estate VERY close to the large Lowry Hill residential area - designed in the late 1960s as a peaceful area of high quality homes and recently extended into Lowry Gardens. Currently, there are mainly low-rise showrooms



or offices where the so-called 'industrial estate' fringes the residential areas. These have minimal visual impact due to a narrow tree-covered bank. But one of the most shocking moments of last night's meeting was to be shown a realistic impression of the proposed gasification plant's visual impact, as it would be seen from the estate. There were gasps of incredulity! The unarguably ugly appearance and enormous height of the installation, towering well above the trees and houses, would have a massively detrimental impact. It would certainly alter the whole ambience of the area.

Besides the appalling visual impact, there are many other concerns which make it most inappropriate for this site. As I've already stated, one of the positive delights of Lowry Hill as a residential area is its ambience of quietness and peace, especially in evenings, nights, weekends and holidays. Yet the company informs us that this proposed plant will be in operation continually - **for 24 hours every day!** Surely it cannot reasonably be denied that this will entail ongoing noise pollution - from large HGVs delivering, manoeuvring, reversing etc., as well as the constant noise from the industrial processes and workings of the plant.

Potential smell nuisance is of great concern too - either from emissions or from the build-up of waste (wherever waste is stored, the proliferation of vermin and insects is also an issue). We are very aware of other installations in Cumbria and Dumfries where the smell issues are notoriously difficult to resolve and can be nauseating. Indeed, some of these currently remain unresolved. I suspect there may be toxins in the air emissions too - "acid gases dioxins, sulphur dioxide, particulates, cadmium, mercury lead and hydrogen sulphide" (*Friends of the Earth paper on gasification plants*) - which the prevailing wind will always carry towards the residences and schools.

We are amazed that this site was deemed appropriate as it seems to us to fly in the face of the published **WRAP** (Waste & Resources Action Programme) **Energy from Waste Guidance** which **clearly** states that **"installation sites should NOT be located within close proximity to residential properties, school or colleges, conservation areas, areas of nature conservation interest, e.g., Local Nature Reserves (LNR), Air Quality Management Areas (AQMA)"**. As well as proximity to our homes, the proposed installation will be near two large schools - **Kingmoor Infants and Junior Schools** - and is actually adjacent to the much valued **Kingmoor Nature Reserve** - a conservation area, and one of the very few, pleasant and widely-enjoyed remaining natural areas of the city, with long views to the fells. We understand that this proposed development is the first of its kind in Cumbria and one can hardly overstate how highly inappropriate this site is for it. Surely, in a rural county of this size, there **MUST** be a much more suitable site away from residences, schools, nature reserves etc.

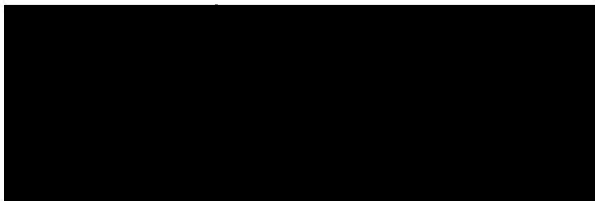
Actually, we are also disturbed by our reading of some **health and safety risk factors** involved in the gasification process. As one would expect, the company representative did his best to sell it with a highly technical spiel; but he was candid enough to concede that the technology is new and somewhat experimental. He was unable to identify similar installations in this country, and his company have none elsewhere. Not content with being blinded by science, we did some online research and read: **"There is currently a lack of independent data to demonstrate how well this [gasification] technology performs and most of the data comes from the companies themselves"**. In an extensive report prepared by Juniper Research Consultancy on 'The Pyrolysis and Gasification of MSW (Municipal Solid Waste)', we read that **"Concerns about operational reliability have been raised by recent problems at various projects worldwide"**. The Report goes on to warn: **"Technology risks for many P&G (pyrolysis & gasification) processes targeting municipal solid waste (MSW) can be significant. One reason for this is that P&G**

processes do not yet have an established track record in the UK. This is compounded by the fact that variants that are being widely marketed here (close-coupled, gasification to gas engines and plasma gasification) have limited relevant track record anywhere else in the world. The lack of relevant track record means that the robustness of guarantees given on factors that may include process availability, maintenance costs and energy output, all of which are necessary to underpin financial models and contract terms, are often called into question in technical due diligence."

The Juniper Report conclude that the integration of gasification with gas engines as *"very risky"* ... to quote their report: "Integration issues will have an impact on factors that include project deliverability, performance guarantees and costs and therefore are seen as having a significant risk potential for P&G projects. The main issue is syngas cleaning. Gas engines and turbines typically have low-tolerances to impurities in the syngas and therefore cleanup of this gas product when processing a heterogenous input such as MSW is challenging. Thus, the cleaning of syngas from this type of feedstock to within narrow tolerances is seen as difficult to achieve and considered a major technical risk factor in integrating MSW gasification with high efficiency energy recovery."

We politely but urgently request that you give full consideration to our objections. If we are available, we would also like to attend the appropriate meeting. Is that possible?

Yours faithfully,

A large black rectangular redaction box covering the signature area.A black rectangular redaction box covering the contact information.

ENVIRONMENT  
DIRECTORATE

- 4 JUL 2016

ENVIRONMENT  
UNIT

29th June 2016

Development Control Team  
Cumbria County Council  
Busher Walk,  
Kendal,  
Cumbria  
LA9 4RQ

Dear [REDACTED]

**PLANNING APPLICATION No. PL\157205 (1/16/9005)**

**Application submitted by Fortum Carlisle Ltd. and Kingmoor Park Properties Ltd.**

**Proposal: (as Indicated on Cumbria County Council Planning website)  
Erection of Energy from waste plant (EFR)**

**Proposal: (as Indicated on the submitted Planning Application)  
Erection and operation of an Energy Recovery Facility (ERF)  
(The assumption being that the application is in respect of an Energy Recovery  
facility as indicated on the submitted planning application)**

As a resident of [REDACTED] (a residential estate situated within 1000 metres of the proposed facility) I wish to formalise my strong objections to the proposed Energy Recovery Facility and urge that Planning Approval be denied.

In making objection I wish to stress that I agree with the principals of the Waste Hierarchy and support all moves to minimise waste disposal through the reliance on landfill sites.

I share the Authority's commitment to prevent waste, to encourage re-use and recycling and to explore and adopt all recovery processes in order to minimise disposal.

In that context I am assuming that the proposal is in respect of an Energy Recovery Facility and that it will not be classified as a disposal facility. Confirmation of the assertion would be appreciated.

Whilst being supportive of the need to encourage and develop ERF and EFW technology to reduce landfill reliance I have very serious concerns about the siting and operation of an ERF on this particular site. Furthermore it is noted that wastes from administrative areas outside Cumbria may be imported to the proposed ERF making Carlisle a Sub-

Regional centre. Such action will only serve to increase the carbon footprint and generate further HGV traffic movement in pursuit of commercial interests rather than environmental benefits.

I assume that this proposal, if classified as an ERF, will

- comply with and meet the requirements of current EEC directives for the incineration process to be considered as a recovery process
- that it would have a R1 energy efficiency performance indicator level greater than 0.65 and that as such would be registered with and monitored by the Environment Agency.

Having read the County Council's "Cumbria Minerals and Waste Local Plan" it is noted that Kingmoor Park has been identified by the Authority as a preferred site. I assume that it was just one of at least two sites considered to be appropriate for this major development. I am unable to find in the M&W Local Plan any rationale behind that decision. Again any information that is available as to how this site was judged to be a preferred site would be welcome. I understand that Kingmoor Park has recently been identified as an Enterprise Zone and wonder if this status and the financial and other benefits were an influencing factor in identifying it as a preferred site. Are there any written records as to how this decision was reached?

**Notwithstanding the issues and concerns expressed above I would also submit the following summary of concerns behind my objections to the ERF proposal which cover**

### **Scale/Mass of proposal**

Examination of the drawings submitted does not give any real impression of the scale and size of the facility nor of the potential impact on adjoining developments. A three dimensional model of the facility and the surrounding buildings etc would give the public a better understanding of the huge mass of the proposal. I expect that the development control team will comment on the design aspect as I believe that to be a personal viewpoint. However I do not consider that a development on this scale should be situated in this location as I believe it will have a detrimental impact on any future proposals and developments which could result in lost employment and economic opportunities.

### **Eco/Environmental Issues**

Flue emissions- Whilst it is accepted that there will be Pollution Prevention and Control measures in place and the requirement for the proposal to meet EU regulations and legislation there still remains a widespread public perception of the risks associated with the release of toxic particulates potentially dangerous to public health.

Monitoring and reporting of emissions by the Environmental (whilst reassuring) will not diminish the concern that will be felt by the surrounding public of the serious health issues associated with extremely volatile and dangerous substances.

### **Presence and processing of Hazardous Materials**

The latter concern is not uniquely focussed on flue emissions but also around the daily operational processes that will be constantly undertaken within the facility together with issues around importing fuel and disposing of arisings etc,

## **Traffic generation, Highway Safety ,Noise and Disturbance**

The influx of heavy goods vehicles required to fully service the facility will undoubtedly have a significant impact on existing road users and on the general public living on or adjacent to whatever preferred vehicular route is preferred. Road safety and Traffic Management and noise control will all be issues that further affect public quality of life This together with the potential for noise and disturbance emanating from the facility will serve only to add to this erosion of life quality to people residing near to the facility

## **Kingmoor Nature Reserve**

Kingmoor South Nature Reserve was given the Environmental status of a "Local Nature Reserve" by Carlisle City Council to raise the profile of and to recognise the benefits arising from public awareness to the natural environment.

The 34 hectare reserve includes an area designated as a "County Wildlife Site" .The whole area providing an ideal environment for everyone to learn and study nature (this being a stated objective ~ the success of which can be measured by the use of the area by local schools)

This natural resource provides a safe and unique opportunity to stimulate interest in nature conservation,by local population and visitors alike.

Clearly another main objective of the Reserve being to provide an environment that protect wildlife inhabitants and natural features.The reserve is home to a host to natural habitants in addition to the unique woodland areas that contain centuries old Oak and Beech trees.

I am concerned that an ERF facility which would be in a close adjacent location may have a significant deleterious impact on this natural resource

## **Impact on residential property/schools**

The perceived impact that this substantial ERF development on all of the local residential community is obviously one of great concern. Other than the real concern relating to Public health is the added concern about property values throughout the whole consultation and planning process and beyond.

To have such a development near so many residential properties is I believe completely unacceptable and calls into question the validity of the decision to identify Kingmoor Park as a preferred site.

Indeed if account is to be taken from an organisation such as the body "WASTE AND RESOURCES ACTION PROGRAMME" (WRAP) then Kingmoor Park would not been seen as a preferred site. I refer particularly to the document entitled EfW DEVELOPMENT GUIDANCE (See web site [wrap.org.uk](http://wrap.org.uk))

**Page 17 of this guidance Section 4.2.6 is essentially relevant to my objection**

**This section is entitled location of sensitive receptors and the following is extracted from that Section:-**

***Ideally the site should not be located within close proximity to :-***

***RESIDENTIAL PROPERTIES***

***SCHOOLS OR COLLEGES***

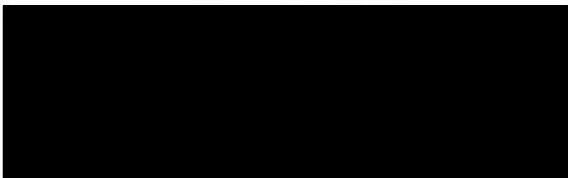
***AREAS OF OUTSTANDING NATURAL BEAUTY***

***ATEA OF NATURE CONSERVATION INTERESTS e.g. SPECIAL AREA FOR  
CONSERVATION, SPECIAL PROTECTION AREA, LOCAL NATURE RESERVE,  
NATIONAL NATURE RESERVE.***

**Section 4.2.5 Land Classification states that any preferred site location should have potential to be situated so as to co-locate with existing or planned waste management facilities thereby strengthening the argument to situate the facility at Hesplan Wood**

**I believe that little or no regard has been taken of these guidelines and submit my objections to you for consideration during the consultation and planning process,**

**Yours sincerely**



[REDACTED]

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From: [REDACTED] <[REDACTED]@gmail.com>  
Sent: 26 June 2016 14:18  
To: Development Control - Planning Dept address  
Subject: Kingmmor waste burning plant 1/16/9005

**Re. Proposed waste burning plant, Kingmoor.**

Your ref. 1/16/9005 Case Officer. [REDACTED].

Please may I oppose this proposed plant. I find the idea of such a plant being located so close to residential areas as outrageous.

My grounds for opposition are that the plant is completely out of character with the local area, and will deter future appropriate industrial, social, recreational and commercial development. This will result in a reduced overall income for the city.

The proposed plant will dominate the local area by its physical size and be visual offensive. It will pollute the atmosphere, realising massive amounts of carbon dioxide and other pollutants.

I have checked with developer and this plant will produce dioxins, which are known to cause cancer.

With an average of one HGV per 10 minutes, 24 hours per day, 7 days per week, 52 weeks per year, there will be increased levels of noise, fumes and nuisance.

There will be an increase in local traffic with consequent risk of accidents.

Being near to the Kingmoor nature reserve, the quality of this environment for relaxation and nature preservation will be deleteriously effected. This will have a carry on effect on local wild life and biodiversity.

The idea of producing electricity by burning material is inconsistent with government policy on reducing greenhouse gases and emissions. The large volumes of ash produced by the site will still have to be disposed of somehow.

The height of the plant will mean it is visible for miles around, detracting from the appetite of the city.

Yours sincerely,



[REDACTED]

[REDACTED]

CA3 0DH

[REDACTED]

[REDACTED]@[cumbria.ac.uk](mailto:[REDACTED]@cumbria.ac.uk)

WARNING: Email attachments may contain malicious and harmful software. If this email is unsolicited and contains an attachment DO NOT open the attachment and advise the ICT Service Desk immediately. Never open an attachment or click on a link within an email if you are not expecting it or it looks suspicious.

## REPRESENTATION SUBMITTED ONLINE

**PLANNING APPLICATION REFERENCE:** 1/16/9005

### REPRESENTATIVE CONTACT DETAILS

Name: Mr [REDACTED]  
 Organisation:  
 Position:  
 Email address: [REDACTED]@gmail.com  
 Telephone No: [REDACTED]  
 Fax No:  
 Address: [REDACTED]  
 [REDACTED]  
 [REDACTED]  
 [REDACTED]

### DATE REPRESENTATION RECEIVED:

**29 June 2016**

### RESPONSE:

**Object**

### COMMENT:

I am a resident of Lowry Hill Estate and would like to put forward my objections to the planned Energy Recovery Facility at Kingmoor Park Carlisle.

I consider the location of this plant is unsuitable for the following reasons

Site Location Guidance

WRAP EfW Development Guidance for site locations Page 17 4.2.6

Website

[http://www.wrap.org.uk/sites/files/wrap/O\\_And\\_EFW\\_Guidance\\_FULLL.pdf](http://www.wrap.org.uk/sites/files/wrap/O_And_EFW_Guidance_FULLL.pdf)

4.2.6 Location of sensitive receptors

Ideally the site should not be located within close proximity to:

? residential properties;

? school or colleges;

? Areas of Outstanding Natural Beauty (AONBs);

? national parks;

? areas or sites of historic interest (e.g. listed buildings World Heritage Sites, Conservation Areas); and

? areas of nature conservation interest, e.g., Sites of Special Scientific Interest (SSSI), Special Area for Conservation (SAC), Special Protection Area (SPA), Local Nature Reserve (LNR), National Nature Reserve (NNR), Biosphere Reserves or Global Geoparks etc.

Should not be located near residential properties.

(Lowry Hill Housing Estate (730 Metres away)  
Crindledyke Housing Estate,  
Newfield Housing Estate and others currently being planned)

Should not be located near Schools

(Kingmoor Junior School,  
Kingmoor Infant School.  
James Rennie school and others planned to accommodate children from new  
housing developments which are currently being built and planned)

Should not be located near Area of outstanding natural beauty

(Kingmoor Nature reserve)

Plant classification

Has a ?R1? classification registration been applied for the proposed Plant?  
If not, the plant cannot be described as a Recovery Plant and will have to be  
reassessed as a Disposal Plant and deemed unsuitable for the proposed location

Websites

<http://www.letsrecycle.com/news/latest-news/defra-list-shows-three-efw-plants-classed-recovery/>

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/221035/pb13888-thermal-treatment-waste.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/221035/pb13888-thermal-treatment-waste.pdf)

Risk Assessment

Has a risk assessment been carried out into the possibility of an accidental explosion in the plant?

Synthesis Gas

In this plant process there will be a cocktail of highly volatile, explosive, corrosive and toxic gases, (hydrogen, methane and other unknown constituents)  
There is the potential for an explosion in the plant, this would result in damage to the plant, surrounding area and also for the release of a toxic and corrosive cloud into the atmosphere

The proposed plant location is adjacent to:-

(The main North/South Railway line.  
The Carlisle Western bye-pass.  
Kingstown Industrial Estate  
Lowry Hill Residential Estate (730 metres away)

Since the prevailing winds are generally from a westerly direction it is obvious that the site location is not suitable and the plant located away from a large residential area

It is for the above reasons, this planning application should be rejected.

**REPRESENTATION SUBMITTED ONLINE**

**PLANNING APPLICATION REFERENCE:** 1/16/9005

**REPRESENTTEE CONTACT DETAILS**

Name: [REDACTED]  
Organisation:  
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Telephone No: [REDACTED]  
Fax No:  
Address:

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

**DATE REPRESENTATION RECEIVED:**

**4 July 2016**

**RESPONSE:**

**Object**

**COMMENT:**

Ideal would be site at Hespian Wood.  
Projected site too near a residential area

**REPRESENTATION SUBMITTED ONLINE****PLANNING APPLICATION REFERENCE: 1/16/9005****REPRESENTATIVE CONTACT DETAILS**

Name: [REDACTED]  
Organisation:  
Position:  
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Telephone No: [REDACTED]  
Fax No:  
Address:

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

**DATE REPRESENTATION RECEIVED:****4 July 2016****RESPONSE:****Object****COMMENT:**

Ideal site would be Hespin Wood.  
Projected site too near a residential area

**REPRESENTATION SUBMITTED ONLINE****PLANNING APPLICATION REFERENCE: 1/16/9005****REPRESENTTEE CONTACT DETAILS**

Name: [REDACTED]  
Organisation:  
Position:  
Email address: [REDACTED]@gmail.com  
Telephone No: [REDACTED]  
Fax No:  
Address:  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

**DATE REPRESENTATION RECEIVED:****4 July 2016****RESPONSE:****Object****COMMENT:**

I wish to log my objection against the application PL/1572\05(1/16/9005) - Energy Waste Plant at Kingmoor Park.

I strongly object the proposal outlined for many reasons. The first point I wish to raise is about its close proximity to the residential areas of Kingstown, Belah, Etterby, Cargo, Crindledyke and Lowry Hill. It has been stated by the developers that the plant will receive wagons/HGV's in excess of 100 per day delivering waste - this will undoubtedly cause an increase in noise levels, which will be constant as deliveries will take place 24/7. Noise will be caused not only by the wagon engines, but by reversing beeps plus the actual unloading of the waste into the plant. Noise will also be created by the operation of the plant from generators and incinerators, which again it has been stated, this is going to be 24/7. In addition to this, there is no doubt in my mind that some odours due to the procedure of burning waste will occur - I understand that it will be dependant of wind direction however given that residential areas are in each direction of the proposed site, there will always be an area effected. I am also concerned about any possible buildup of waste which will occur in times of shut down due to maintenance or breakdown. This would not only create a foul smell but also may lead to vermin being attracted to the area.

We are very fortunate in this area to have a local Nature Reserve, I feel both the flora and fauna of this would be badly effected by the waste plant and that our nature reserve would no longer attract and give home to precious wildlife, and would not be the wonderful habitat that so many families, residents and pupils from the local schools in the area take time to walk through and explore. My final point is against the actual size of the facility and its position. It is huge! The chimney will tower above all buildings in its vicinity and over the tree line of the nature reserve. I feel a building of this scale would NEVER ordinarily be allowed as it would be deemed to be not in keeping with the characteristics of the local area and on this basis should not be allowed here. For such a facility to be visible from so many residential areas is simply unacceptable.

The area in which I and so many other chose to live and bring up children is precious, and for a waste incineration facility to be built here and change the area irreversibly is just wrong. We have to consider the impact on not only the current generation but that of the future ones too. By industrialising both the residential area and natural habitats in this way is simply unfair to anyone - humans, animals and plants. I must add that I do completely understand the environmental reasoning behind the plant and do believe that we should have an alternative to landfill but I do not accept that a plant is required so close to residential areas.

I hope you consider my points seriously and look forward to hearing from you in due course.

A concerned resident of Lowry Hill.

██████████



**REPRESENTATION SUBMITTED ONLINE****PLANNING APPLICATION REFERENCE: 1/16/9005****REPRESENTATIVE CONTACT DETAILS**

Name: [REDACTED]

Organisation:

Position:

Email address: [REDACTED]@hotmail.com

Telephone No:

Fax No:

Address: [REDACTED]

**DATE REPRESENTATION RECEIVED:****30 June 2016****RESPONSE:****Object****COMMENT:**

I wish to object on design grounds.

Chapter 7 of the NPPF applies in the design of all new development. It seeks to preclude poor design that fails to take the opportunity for improving the character and quality of an area and the way it functions.

It seeks for good design to mitigate against infrastructure proposals that promote sustainability. It does not give the green light for any utilitarian structure to be built, just on the basis of environmental gains to be had.

This structure is extremely poor in design terms with a lack of regard to surroundings and key public realm receptor experience, particularly from the key arterial CNDR route served by thousands of people per day and also longer distant views. The building's mass is far bigger than anything in the vicinity with main building height at circa 40m and chimney far beyond at 70m.

While the character of the area is one that is accustomed to utilitarian buildings for commerce, it is not accustomed to buildings on this scale. Indeed, existing buildings in the area are intermittently broken up by trees of similar scale in height. This is with the exception of Thomas Graham building which is another poor example of design with no apparent attempt to break up with landscaping at the immediate boundary. That said, the proposed ERF (or power station) will be far bigger.

The chimney is positioned at the most sensitive receptor elevation, on the eastern side facing the CNDR. This will draw the eye to the building and exacerbate visual

impact. The enormous silos while set back from CNDR will serve only to compound the visual impact (and it is noted that viewpoints/photomontages have been selected that do not illustrate the silos).

The proposed landscaping will not sufficiently mitigate the visual impact. This is a significant visual impact that will be highly oppressive to the public realm, particularly at the immediate local level.

It seems that there has been no due consideration to design and that on-off the shelf product is proposed. There are examples in Europe of well designed ERFs where scale and mass is reduced by sensitive orientation of buildings and break up of mass and scale through a carefully designed roof structure. While such a design may indeed cost more, this is not considered material in planning terms.

A material consideration adding weight to the unacceptable design is the setting of a precedent. Should this structure be built, it shall pave the way for other highly obtrusive and oppressive structures to follow in the area.

It is accepted in planning practice that poor design can outweigh other planning benefits. In other words and in layman terms, it can trump all other sustainability credentials and justify refusal in planning terms.

I strongly urge the County Council to not accept this substandard design. Indeed, a question mark exists over the validity of the planning application. The plans do not precisely confirm proposed materials or colour but seek to open this up to negotiation.

It is only right, given the sheer scale of this building and associated EIA, that such design details are precisely confirmed as part of public planning process and that transparent consultation and consideration can be given. It should not be left to technical discharge of condition process given the scale of building that is being proposed and local impact.

Thank you for the opportunity to comment.

**REPRESENTATION SUBMITTED ONLINE****PLANNING APPLICATION REFERENCE: 1/16/9005****REPRESENTTEE CONTACT DETAILS**

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Organisation:  
Position:  
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Telephone No:  
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Address: [REDACTED]  
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[REDACTED]

**DATE REPRESENTATION RECEIVED:****6 July 2016****RESPONSE:****Object****COMMENT:**

On the grounds of excessive, noise, dust, smell or nuisance. Planned 100 HGV deliveries per day will cause significant disturbance and distress especially during night, weekends and holiday periods. Proximity to nearest residential accommodation (730m) unsuitable. This untested technology may result in breakdowns/maintenance shutdowns which could lead to build of smelly waste awaiting incineration leading to increase in rodents/fly in the area. On the grounds of position in respect of Government Planning Policy - WRAP EfW guidelines indicate that these facilities should not be located near residential areas school or local nature reserves and the proposed facility is very close to Kingmoor nature reserve, Kingmoor Junior School and the Lowry Hill residential estate. The design is out of keeping with the character of the area.

**REPRESENTATION SUBMITTED ONLINE****PLANNING APPLICATION REFERENCE: 1/16/9005****REPRESENTATIVE CONTACT DETAILS**

Name: [REDACTED]  
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 Position:  
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 [REDACTED]  
 [REDACTED]  
 [REDACTED]  
 [REDACTED]  
 [REDACTED]

**DATE REPRESENTATION RECEIVED:****6 July 2016****RESPONSE:****Object****COMMENT:**

I would like to raise an objection to the the applicaton PL/1572/05(1/16/9005). My main objection relates to the proposed location of the plant. The area proposed, although classed as an industrial estate, is primarily used by companies for Warehousing, showrooms and offices. This would be the first major combustion type of process in the estate which is adjacent to a local nature reserve, a large residential area and an infant and junior school. the structure itself will have a huge impact on the outlook from many areas of the residential area. There is also the matter of the increased noise that up to 100 HGV wagons will generate and the noise from the plant itself which will run continuously 24 hours a day, never mind any environmental impact from possible toxins being released into the air from a chimney just 730m from the nearest residential property. This technology is brand new and this is worrying and what will happen in the event of a break down or regular maintenance (will this mean waste will be left sitting in the warehouse whilst the machinery is in shut down?).

The concern regarding pollution levels is huge and WRAP EfW guidelines indicate that facilities like this should not be located near residential areas.

Although i understand the need for plants such as this, i cannot understand the rationale behind building a plant like this beside a residential area and a nature reserve, Surely, there are more suitable sites, such as the current land fill site at Hespan Wood.

**REPRESENTATION SUBMITTED ONLINE**

**PLANNING APPLICATION REFERENCE:** 1/16/9005

**REPRESENTTEE CONTACT DETAILS**

Name: [REDACTED]  
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[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

**DATE REPRESENTATION RECEIVED:**

7 July 2016

**RESPONSE:**

**Object**

**COMMENT:**

Concerns relate to the following: Excessive noise, dust, smell or nuisance. Impact upon surrounding residents, animals and schools. Highway safety and traffic impact. Its position in respect of Government Planning Policy. Its impact on Conservation areas. Its design out of keeping with the character of the area.

**REPRESENTATION SUBMITTED ONLINE****PLANNING APPLICATION REFERENCE: 1/16/9005****REPRESENTTEE CONTACT DETAILS**

Name: [REDACTED]  
Organisation:  
Position:  
Email address: [REDACTED]@talktalk.net  
Telephone No: [REDACTED]  
Fax No:  
Address:

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

**DATE REPRESENTATION RECEIVED:****7 July 2016****RESPONSE:****Object****COMMENT:**

High pollution levels. The EfW facility near Dumfries has repeatedly failed to keep to the required emissions standards

**REPRESENTATION SUBMITTED ONLINE**

**PLANNING APPLICATION REFERENCE:** 1/16/9005

**REPRESENTATIVE CONTACT DETAILS**

Name: [REDACTED]  
Organisation:  
Position:  
Email address: [REDACTED]@hotmail.co.uk  
Telephone No: [REDACTED]  
Fax No:  
Address:

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

**DATE REPRESENTATION RECEIVED:**

7 July 2016

**RESPONSE:**

**Object**

**COMMENT:**

I object on the following aspects:

- 1.compliance with the local plan - there isnt one approved.
- 2.dominant and oppressive environment that thsi facility will create adjacent to and down wind of a large residential area.
- 3.concern that there will be a lot of noise dust smell and nuisance from the facility.
- 4.that the facility will have an adverse effect on the adjacent nature reserve.

## REPRESENTATION SUBMITTED ONLINE

**PLANNING APPLICATION REFERENCE:** 1/16/9005

### REPRESENTTEE CONTACT DETAILS

Name: [REDACTED].

Organisation:

Position:

Email address: [REDACTED]@Hotmail.Com

Telephone No: [REDACTED]

Fax No:

Address: [REDACTED]

### DATE REPRESENTATION RECEIVED:

**8 July 2016**

### RESPONSE:

**Object**

### COMMENT:

Firstly I would like to say that at a time when we are trying to cut greenhouse gases and waste production in the face of global warming and climate change, this plant makes no sense as it flies in the face of just such efforts, relying as it does on the continued production of waste and producing greenhouse gases.

More specifically, I'd like to make the following points:

- 1 There seems to be a very serious question mark over how this site has been chosen under an abandoned development plan system.
- 2 The impact of the 80 plus lorries that will be passing in and out of the site will have noise and pollution consequences for the local population. These will be particularly problematic at night and could create real disruptions as this site is only 730 metres away from the nearest residential area.
- 3 The technology to be used is untested in the uk and being run by a company with no proven record in managing such a facility thus increasing the probability of breakdowns in the system and maintenance issues.
- 4 There is absolutely no way of guaranteeing that dangerous pollutants will not get into the environment next to residential areas that include an infant school and a primary school.
- 5 The site is very near the kingmoor nature reserve, highly prized by the residents of Carlisle and there is no way of knowing how the outlook and safety concerns of the plant will have on this reserve.
- 6 WRAP EfW guidelines indicate that this kind of facility should not be located near residential areas, schools or local nature reserves.

In general, it seems that this proposal has been ill thought out, based on perhaps illegitimate process, contrary to recognised efforts to tackle climate change and potentially dangerous to the local community and beyond. I object to it in the strongest possible terms.



**REPRESENTATION SUBMITTED ONLINE****PLANNING APPLICATION REFERENCE: 1/16/9005****REPRESENTTEE CONTACT DETAILS**

Name: [REDACTED]  
 Organisation:  
 Email address: [REDACTED]@hotmail.co.uk  
 Telephone No: [REDACTED]  
 Fax No:  
 Address:

[REDACTED]  
 [REDACTED]  
 [REDACTED]  
 [REDACTED]

**DATE REPRESENTATION RECEIVED:****8 July 2016****RESPONSE:****Object****COMMENT:**

There are many reasons why this facility should not be based at this site.

- 1.The design is completely out of character with the area dominating the sky line and too close to a large infant nursery and junior school.this is downwind of any possible leaks of pollutants. It is within 1000 metres.
- 2.The site is only allocated for this facility on an out of date plan and does not seem to meet current development regulations.
- 3.it is far too close to the Kingmoor Nature Reserve.(300 m)
- 4.The dev is outside the scope of similar businesses in the area.
- 5.There will be excessive noise smell dust and nuisance from vehicles using the site24/7.I am worried that vehicles bleeping on reversing all night will be heard in the area as sound carries at night.
- 6.The technology being used is untested in the UK and will result in breakdowns,smells,leaks and build up of waste.I believe a similar facility in Dumfries has experienced theses problems.
- 7.Who will monitor all the waste to ensure it meets with current guidelines and that toxic fumes do not leak from the chimney and contaminate the area and damage all our health and that of 800 pupils at the schools.
- 8.Finally the current WRAP EfW guidelines state that these facilities should not be located near residential areas,schools or nature reserves. This facility clearly does breach all these guidelines.

It should be placed away from housing,what about the current tip site at Hespin Wood?

## REPRESENTATION SUBMITTED ONLINE

**PLANNING APPLICATION REFERENCE:** 1/16/9005

### REPRESENTTEE CONTACT DETAILS

Name: [REDACTED]  
 Organisation:  
 Position:  
 Email address: [REDACTED]@gmail.com  
 Telephone No: [REDACTED]  
 Fax No:  
 Address: [REDACTED]  
 [REDACTED]  
 [REDACTED]  
 [REDACTED]  
 [REDACTED]  
 [REDACTED]

### DATE REPRESENTATION RECEIVED:

8 July 2016

### RESPONSE:

**Object**

### COMMENT:

With regard to the above proposal I have attended both public meetings at Kingmoor Junior School. I have listened to all the questions and answers raised and I have not at all been reassured that this incineration plant (which is what it is) is being planned in the right position in the town.

In fact I cannot believe that our Council, that are supposed to look after the community's welfare have even considered this site as suitable for such a plant.

It beggars belief that Lowry Hill area is yet again subject to the imposition of more noise, smell and dangerous emissions. I am totally against the proposal at this site for the following reasons:-

1) Closeness to residential properties and schools when there are so many other sites that could be used away from our community.

2) The effects on air quality when a plant like this is pouring out emissions round the clock and needs a 70 meter high chimney to carry away the particles and gasses produced.

3) The size of the building is huge with a large chimney that will clearly be visible to residential areas all around. I cannot state too highly the visual impact will be great. Clearly not in keeping with other buildings.

4) The impact of increased noise from the plant itself but also from increased traffic is very worrying. The impact of noise already on Lowry Hill estate from the new ring road is very marked and has turned our once quiet countryside environment into an annoying constant humming of traffic. I welcome anyone to come to my garden and experience this already intrusive noise.

No one can possibly argue that this plant will not give off unpleasant smells, not to mention other things we can't see or smell. You just have to go anywhere near a waste plant to see the seagulls, hear the noise and smell the rotting waste.

5) There must be more suitable sites. Cumbria has more open space than most other counties and yet the Council think that this site is considered safe. Would you choose to live approx 700 meters from this proposed plant?

6) We have a fabulous nature reserve around Lowry Hill; it borders my rear garden. What impact will this plant have on the perceived safety and concerns of families that use the walks, let alone the effect it may have on wildlife.

All in all I am quite upset that my local council think fit to place this plant anywhere near where people live and breathe.

I object to the plan 100%,

Yours faithfully,

██████████ ( a very concerned resident)

**REPRESENTATION SUBMITTED ONLINE****PLANNING APPLICATION REFERENCE: 1/16/9005****REPRESENTATIVE CONTACT DETAILS**

Name: [REDACTED]  
Organisation:  
Position:  
Email address: [REDACTED]@[REDACTED].plus.com  
Telephone No: [REDACTED]  
Fax No:  
Address: [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

**DATE REPRESENTATION RECEIVED:****10 July 2016****RESPONSE:****Object****COMMENT:**

The location of the proposed EfW Plant (PL/1572/05(1/16/9005) is inappropriate. It is clear no meaningful alternative locations were considered in that the proposal of Hespin Wood does not have space and Willowholme is in a flood zone. Where else in Cumbria was proposed?

The location is in breach of Development Guidance in that it is close to large sensitive receptors. There are currently a number of primary schools and nursery schools in close proximity with an additional school planned. There is a large residential area nearby which will be penalised by all types of pollution with the council's repeated failure to control other sources of pollution (slaughterhouse).

The site is also located in an area with no history of heavy industry. The industrial site currently comprises a training centre (Gen2), distribution depots and a saw mill.

The height of the building is not in keeping with local surroundings.

The demand arises to comply with EU directives. However following the Referendum, EU directives may no longer apply.

[REDACTED]

---

From: [REDACTED]@ [REDACTED].plus.com>  
Sent: 15 July 2016 18:27  
To: Development Control - Planning Dept address  
Subject: Re: Planning Application Ref. 1/16/9005 - Acknowledgement of Representation

Follow Up Flag: Follow up  
Flag Status: Flagged

Dear Sirs

Thank you for advising us of the date for the meeting which is during school holidays when a number of objectors will be on annual leave.

Regards  
[REDACTED]

----- Original message -----

From: Development Control - Planning Dept address <developmentcontxxx@xxxxxxx.xxx.xx>  
Date: 15/07/2016 08:18 (GMT+00:00)  
To: Development Control - Planning Dept address <developmentcontrol@cumbria.gov.uk>  
Subject: Planning Application Ref. 1/16/9005 - Acknowledgement of Representation

Dear Sir/Madam,

Acknowledgement of Representation on Planning Application Ref. 1/16/9005

Location: Kingmoor Park Industrial Estate, Land to North of Kings Drive, Carlisle, Cumbria, CA6 4SE

Proposal: Erection of an energy from waste plant including reception and fuel processing hall, boiler house and air cooled condensing building and associated operations including 70 m high flue stack, 2 no silos for storage of fuel, 4 no silos for the storage of ash, car parking and new access roads, gatehouse, utilities building, weighbridge, and balancing pond.

Thank you for your email of representation expressing your objection with regard to the above planning application. Your comments will be taken into account by the County Council's Development Control and Regulation Committee in making a decision in the following manner:

- A written report to the Committee on the planning application will be produced which summarises all the relevant planning matters raised in letters/emails of representation. Letters/emails received after the report has been finalised (usually 10 days before the committee meeting) are reported to the Committee meeting verbally.
- All letters/emails are made available for inspection by Members of the Committee at the meeting.

There is the opportunity for objectors to express their views in person at the Committee meeting which is held at the County Offices in Kendal. Information on how to go about doing this can be found online at:

<http://cumbria.gov.uk/elibrary/Content/Internet/538/755/1930/42289104625.pdf>

This application is currently provisionally scheduled to be considered by Committee 24<sup>th</sup> August 2016.

Yours sincerely



Planning Officer

Development Control

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<http://www.cumbria.gov.uk/>\_

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**REPRESENTATION SUBMITTED ONLINE****PLANNING APPLICATION REFERENCE: 1/16/9005****REPRESENTATIVE CONTACT DETAILS**

Name: [REDACTED]

Organisation:

Position:

Email address:

Telephone No:

Fax No:

Address: [REDACTED]

**DATE REPRESENTATION RECEIVED:****12 July 2016****RESPONSE:****Object****COMMENT:**

Application Number PL/1572/05(1/6/9005)

This plant would be in the wrong location for a number of reasons eg :- Proximity to housing & schools ( Could it be any closer ?? ) Possible health effects from an untried technology. Too much noise & smell would be created. Next to a nature reserve. Increased traffic noise 24/7.

I personally do not have a lot of confidence in five years of weather data in computer modelling to determine if the output from the stack is safe. I have no doubt the Environment Agency used a much longer time scale with much more data in their Flood Protection Plan & we all know what happened.

We have an "Energy Coast" in Cumbria, surely that offers opportunities for this experimental plant? Would that location not be more appropriate under Government & CCC planning?



**REPRESENTATION SUBMITTED ONLINE****PLANNING APPLICATION REFERENCE: 1/16/9005****REPRESENTTEE CONTACT DETAILS**

Name:

[REDACTED]

Organisation:

Position:

Email address:

[REDACTED]@hotmail.co.uk

Telephone No:

[REDACTED]

Fax No:

Address:

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]**DATE REPRESENTATION RECEIVED:**

12 July 2016

**RESPONSE:**

Object

**COMMENT:**

**REPRESENTATION SUBMITTED ONLINE**

**PLANNING APPLICATION REFERENCE:** 1/16/9005

**REPRESENTTEE CONTACT DETAILS**

Name: [REDACTED]  
Organisation:  
Position:  
Email address: [REDACTED]@sky.com  
Telephone No: [REDACTED]  
Fax No:  
Address:

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

**DATE REPRESENTATION RECEIVED:**

13 July 2016

**RESPONSE:**

**Object**

**COMMENT:**

I don't want this next to several housing estates and it cannot help the green house effect

**REPRESENTATION SUBMITTED ONLINE**

**PLANNING APPLICATION REFERENCE:** 1/16/9005

**REPRESENTTEE CONTACT DETAILS**

Name: [REDACTED]  
Organisation:  
Position:  
Email address: [REDACTED]@hotmail.com  
Telephone No:  
Fax No:  
Address:

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

**DATE REPRESENTATION RECEIVED:**

13 July 2016

**RESPONSE:**

**Object**

**COMMENT:**

I strongly object to this application as the as the proposed business is far too close to a residential area.

**REPRESENTATION SUBMITTED ONLINE**

**PLANNING APPLICATION REFERENCE:** 1/16/9005

**REPRESENTTEE CONTACT DETAILS**

Name: [REDACTED]  
Organisation:  
Position:  
Email address: [REDACTED]@sky.com  
Telephone No: [REDACTED]  
Fax No:  
Address:

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

**DATE REPRESENTATION RECEIVED:**

7 July 2016

**RESPONSE:**

**Object**

**COMMENT:**

Concerns relate to the following: Excessive noise, dust, smell or nuisance. Impact upon surrounding residents, animals and schools. Highway safety and traffic impact. Its position in respect of Government Planning Policy. Its impact on Conservation areas. Its design out of keeping with the character of the area.

[REDACTED]

---

From: [REDACTED]@sky.com  
Sent: 09 July 2016 17:58  
To: Development Control - Planning Dept address  
Subject: Planning Application No:-PL\1572\05 (1/16/9005)

Dear Sir/Madam,

I am a resident of Lowry Hill and wish to lodge an objection to the above planning application for a Energy Recovery Facility/ Waste Incinerator at Kingstown Park, Carlisle. The reasons for my objection are as follows:-

### **1 Compliance with the Local Plan**

The proposed site is identified as the preferred location in the 2012 *Site Allocations Policies and Proposals Map* - due to governments new development plan system this plan has been abandoned and there is a vacuum regarding a detailed County plan.

### **2 Design out of keeping with the character of the area**

The type of development on the surrounding industrial estate is predominately warehousing, showrooms and offices. The proposed development would be the first major combustion type process and its location close to a nature reserve, schools and residential areas is completely unacceptable. The prevailing westerly wind direction would mean these areas are at great risk if any malfunction took place in the plant.

### **3 Dominant and oppressive environment created by proposal**

The development includes very large structures which will have a huge impact on the outlook from elevated areas of Lowry Hill Road and around Kingmoor Nature Reserve.

### **4 Excessive noise, dust, smell or nuisance**

The plan is to service this incinerator with 100 HGV deliveries a day with each HGV reversing into the reception hall with accompanying reversing beeps causing distress particularly overnight, weekends and holiday periods - it is planned to run the plant 24/7, 365 days a year. The distance to the nearest residential accommodation (730m) is particularly relevant and noise from the waste treatment and generator will also cause disturbance. Should problems be found with the plant a build up of HGV's carrying smelly and toxic waste is bound to occur as happened with the Dumfries EfW plant which is bound to increase flies and rodents in the area.

A significant failure at the plant could lead to the release of toxic and corrosive material onto the surrounding area. I am further concerned that this type of technology (which I understand is untested in the U.K.) will inevitably result in frequent shutdowns for maintenance or breakdown which will increase the risk of the above problems.

### **5 Impact on Conservation Areas**

The development is only 300 to 400m from the Kingmoor Nature Reserve and any problems with the plant will greatly impact on the amenity of this well used area. Traffic movement will also have an adverse impact.

### **6 Its position in respect of Government Planning Policy**

Whilst it is claimed that pollution levels proposed will be lower than arising along the A7 there is a EfW facility near Dumfries that has repeatedly failed to keep to the required emissions standards and it has proved difficult to do anything about this problem within a reasonable timeframe.

WRAP EfW guidelines indicate that these facilities should not be located near residential areas, schools or local nature reserves - this facility is very close to all three!

## **7 Visual or Landscape Impact**

The image on the planning application (KNG-017cG Visuals A3.indd) gives some indication of the significant visual impact to Lowry Hill residents and will be even greater to some access points to Kingmoor Nature Reserve.

For the above reasons I consider that this planning application should be refused.

Yours faithfully,

[Redacted signature]

[Redacted name]

[Redacted title]

[Redacted address line 1]

[Redacted address line 2]

[Redacted address line 3]

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[REDACTED]

---

From: [REDACTED]@live.co.uk>  
Sent: 10 July 2016 20:54  
To: Development Control - Planning Dept address  
Subject: Application Number: PL\1572\05 (1/16/9005)

Dear Sirs,

I wish to raise an strong objection to the application detailed above with my reasons for my objection being detailed below:

1. Design out of keeping with the character of the area

Despite the fact that the proposed location is in an industrial estate the types of development on the estate are mainly warehousing, showrooms and office accommodation. This would be the first major combustion type of process in the estate and it is adjacent to a local nature reserve and close to a residential area with a junior and primary school. Its extremely unsightly and not in keeping with the area at all.

2.Dominant and oppressive environment created by the proposal

This development includes very large structures which will have a huge impact on the outlook from the elevated areas of Lowry Hill Road and some locations around the Kingmoor Nature Reserve.

3.Excessive noise, dust, smell or nuisance

The plan is to service this incinerator with 100 HGV deliveries per day. Each of these deliveries will require the reversing of the HGV into the reception hall with accompanying reversing beeps. We are concerned that this will cause significant disturbance and distress especially when this occurs during the night, over weekends and during holiday periods, never mind the impact on my day-to-day journey to and from work (parkhouse road). We are also concerned that the distance from the nearest residential accommodation (730m) means that the noise of the waste treatment and the generator will cause disturbance especially during the night. We are concerned that this type of technology (untested in the UK) will inevitably result in frequent shutdowns for maintenance or breakdown. We are concerned that at these times there will be a build up of smelly waste waiting to be incinerated (as occurred at the Dumfries EfW plan) and that this will increase flies and rodents in the area.

4. Impact upon Conservation areas

The development is very close (perhaps 300-400m) to the Kingmoor Nature Reserve, a highly valued area for dog walkers and family walks. We are concerned that the outlook and perceived safety concerns will affect the value of this reserve.

#### 5. Its position in respect of Government Planning Policy.

There is considerable concern from the residents that while the pollution levels proposed may be lower than the pollution arising from Kingmoor Road, there is a EfW facility near Dumfries that has repeatedly failed to keep to the required emissions standards. It has proved difficult to do anything about this problem within a reasonable timeframe.

WRAP EfW guidelines indicate that these facilities should not be located near residential areas, school or local nature reserves.

The proposed facility is very close to Kingmoor nature reserve, Kingmoor Junior School and the Lowry Hill residential estate.

#### 6. Visual or Landscape Impact

The image on the planning proposal (KNG-017cG Visuals A3.indd) gives some indication of the significant visual impact to Lowry Hill residents. This impact will be even greater at some of the entrances to and exits from the Kingmoor Nature Reserve.

I have considered the application in great depth and cannot see any benefit from the planning permission being granted, therefore i strongly object to the proposal.

Regards

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

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[REDACTED]

---

From: [REDACTED]@gmail.com>  
Sent: 10 July 2016 13:14  
To: Development Control - Planning Dept address  
Subject: Energy Plant Near Lowry Hill

Proposal to build an Energy from Waste plant 730 meters from the Lowry Hill Estate

Dear Sir/Madam,

I would like to complain about the application PL\1572\05 (1/16/9005) on the following grounds –

LOCATION

It is too near to the houses on the Lowry Hill Estate and Kingmoor School. With the amount of ground available, a more suitable site could be found e.g. Hespin Wood.

It is also too near The Kingmoor Nature Reserve which is used a great deal by dog walkers. The noise will cause significant distress to the animals. It is also used a lot for family walks and I feel the noise will put off a lot of people.

NOISE, SMELL

The proposed site is only about 700 meters from the nearest residential accommodation and that means there will be excessive noise and cause significant disturbance.

Yours sincerely,

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

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[REDACTED]

---

From: [REDACTED]@gmail.com>  
Sent: 26 July 2016 11:26  
To: Development Control - Planning Dept address  
Subject: Waste Plant in the North of the City

Proposal to build an Energy from Waste plant 730 meters from the Lowry Hill Estate

Dear Sir/Madam,

I would like to complain about the application PL\1572\05 (1/16/9005) on the following grounds –

LOCATION

It is top near to the houses on the Lowry Hill Estate and Kingmoor School. With the amount of ground available, a more suitable site could be found e.g. Hespin Wood.

It is also too near The Kingmoor Nature Reserve which is used a great deal by dog walkers. The noise will cause significant distress to the animals. It is also used a lot for family walks and I feel the noise will put off a lot of people.

NOISE, SMELL

The proposed site is only about 700 meters from the nearest residential accommodation and that means there will be excessive noise, especially at night and cause significant disturbance.

I would assume with all the waste about, and especially if the plant was to breakdown it would attract all sorts of vermin (Rats, Mice etc).

Yours sincerely,

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

WARNING: Email attachments may contain malicious and harmful software. If this email is unsolicited and contains an attachment DO NOT open the attachment and advise the ICT Service Desk immediately. Never open an attachment or click on a link within an email if you are not expecting it or it looks suspicious.

Planning application no.

PL/1572/05 (1/16/9005).

REGARDING THE PROPOSED KINGMOOR ENERGY RECOVERY FACILITY

I am a member of the Lowry Hill Residents Association



Please tick ONE of the following TWO boxes:

I am in favour of the proposal to build an Energy Recovery Facility at the proposed site in Kingmoor Park.



I am against the proposal to build an Energy Recovery Facility at the proposed site in Kingmoor Park.



I have the following concerns regarding this proposal:

Please write down your own concerns or circle any of those listed:

➤ Location and closeness to housing

➤ Impact on House Prices

➤ Effects of Air pollution

➤ Reputation of Carlisle 'the waste city'

➤ Size of building and chimney

➤ Increased Noise

➤ Impact on retail/tourism

➤ Greenhouse gasses

➤ Impact on transport and roads

➤ Nearness to schools

➤ Plant shutdown issues

➤ Effects on health

➤ Possible alternative sites

Other concerns:

The incinerator will emit pollutants via the stack. The amount is arguable BUT the need for a 70m stack shows that pollutant dispersal is a factor of this incinerator. To site

I would like to make the following comments:

Such a project, upwind of an area Carlisle has developed as a residential area is potentially dangerous. Changing

atmospheric conditions, temperature inversions etc will affect dispersal. These are FACTS and should send alarms to this planning application.

APPLICATION NUMBER PL/1572/05(1/16/9005)

## OBJECTION TO ENERGY FROM WASTE PLANT LOCATED AT KINGMOOR

I strongly object to the development of a Waste Incinerator being located so close to local housing and schools.

My main objection is the possible fallout and smell from the operation, having worked in engineering for 40 years I know that things do fail at times, filters become blocked, poor maintenance caused problems and lack of funding comes into play, for example: Innovia Films at Wigton, the Penrith processing plant and a waste incinerator at Dumfries.

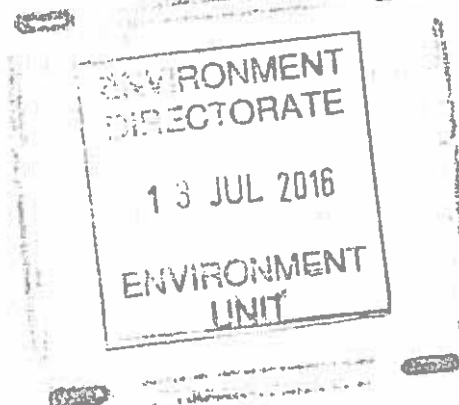
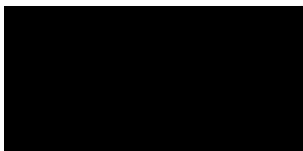
I would also mention that, depending on the way the wind is blowing, the sewerage processing plant at Willowholme causes an unpleasant smell at times.

These problems cannot be easily rectified once the plant is built and operational and therefore this development is not suitable to be located so near to a residential area.

Other issues I would mention are noise, dust and the unknown health effects to people living and working nearby.

This development, considering the points mentioned above and the dominant and oppressive nature of the building, not to mention the environmental problems it brings with the massive increase in delivery vehicles will have a negative effect on the area.

Carlisle is an expanding city why limit its growth by building such a plant so close to an already developed area "PLEASE GET IT RIGHT THIS TIME" and find a more isolated area.



[REDACTED]

---

From: [REDACTED]@tesco.net>  
Sent: 11 July 2016 15:33  
To: Development Control - Planning Dept address  
Subject: Planning application number: PL\1572\05 (1/16/9005)

Dear Sirs,

**Planning application number: PL\1572\05 (1/16/9005)**

I object to the proposal to build an Energy from Waste plant at Kingmoor Park.

There is a need to deal with the problems of Landfill and Energy Security.

BUT

The site proposed is unsuitable for the following reasons

1. It is too close to homes and schools.
2. The design as seen from Lowry Hill Estate is out of keeping with the character of the area.
3. There will be nuisance from noise and smell. Flue effluents will be even worse in periods of temperature inversion. The danger of toxic waste cannot be ruled out, despite the developers' assurances.
4. Traffic locally will be increased.

Imagine Eden Bridge closed as it was at the end of last year.

5. It is too close to Kingmoor Nature Reserve.

AND

The proposal is for a method not yet proven to be safe and by a developer with no proven pedigree.

Yours faithfully

[REDACTED] and [REDACTED]  
[REDACTED]

WARNING: Email attachments may contain malicious and harmful software. If this email is unsolicited and contains an attachment DO NOT open the attachment and advise the ICT Service Desk immediately. Never open an attachment or click on a link within an email if you are not expecting it or it looks suspicious.

**REGARDING THE PROPOSED KINGMOOR ENERGY RECOVERY FACILITY**

I am a member of the Lowry Hill Residents Association



Please tick ONE of the following TWO boxes:

I am in favour of the proposal to build an Energy Recovery Facility at the proposed site in Kingmoor Park.



I am against the proposal to build an Energy Recovery Facility at the proposed site in Kingmoor Park.



I have the following concerns regarding this proposal:

Please write down your own concerns or circle any of those listed:



Location and closeness to housing

➤ Effects of Air pollution



Size of building and chimney

➤ Impact on retail/tourism

➤ Impact on transport and roads



Plant shutdown issues



Possible alternative sites



Impact on House Prices

➤ Reputation of Carlisle – 'the waste city'

➤ Increased Noise

➤ Greenhouse gasses

➤ Nearness to schools



Effects on health

Other concerns:

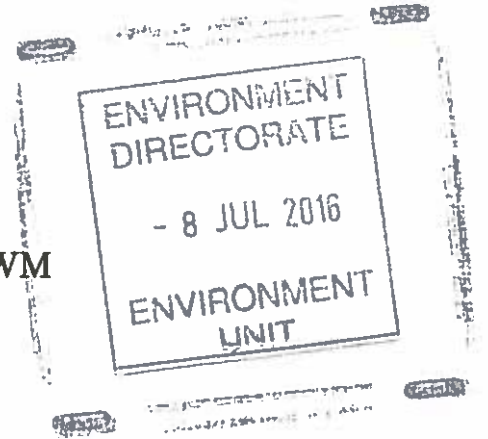
I would like to make the following comments:

See [REDACTED] report summary.

ENVIRONMENTAL SURVEY AND PETITION  
PROPOSED DEVELOPMENT: APPLICATION NUMBER, PL\1572\05 (1/16/9005)

[REDACTED] BSc (Hons) CEnv MCIWM

Date: July 2016



## ***SUMMARY***

### **Proposed Development: Waste to Energy Plant at Kingmoor, Carlisle.**

#### **Introduction:**

An independent environmental survey was carried out in the summer of 2016 by myself and few colleagues regarding the proposed development, Waste to Energy Plant at Kingmoor, Carlisle.

#### **Aim:**

The aim of the survey was to assess the response of the residents on the Lowry Hill Estate adjacent to the proposed development, approximately 730 metres from Lowry Hill Road.

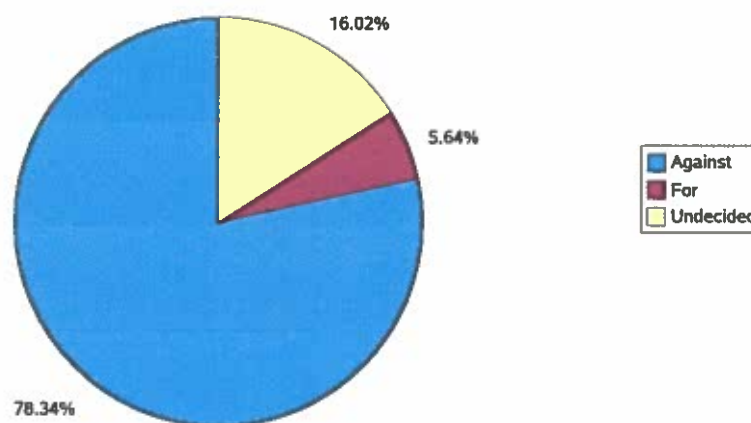
#### **Method:**

A door to door survey was carried to find out how many residents including visitors of Lowry Hill Estate were for and against the proposed development. In the survey 350 people took part and just over 200 out of 1001 properties were covered including Northern and Southern areas of the estate.

#### **Results Of Survey**

Figure 1. Results of Survey regarding proposed development: Waste to Energy Plant at Kingmoor, Carlisle.

#### **Public perception regarding Proposed development.**



#### **Discussion:**

Although approximately 25% of Lowry Hill Estate was covered the results show an overwhelming majority, 78.34% were against the development, 5.64% for and 16.02% undecided, see fig 1. When interviewed the primary concern against the development was the location and close proximity to Lowry Hill housing estate (approximately 730m ). Other concerns included: air pollution, traffic increase, plant shut down, visual impact (tall chimney stack) overlooking the Kingmoor Nature Reserve, close proximity to schools, health effects and increased noise levels since the plant will be operating 24 hours a day, 7 days per week and 365 days a year.

#### **Conclusion:**

According to the majority of the people interviewed, (78.34%) the development should not go ahead at Kingmoor Industrial Estate due to close proximity and sensitivity of the residential area, to the proposed development (730m) and other reasons stated in the discussion.

**Recommendations:** An alternative and suitable site should be found.

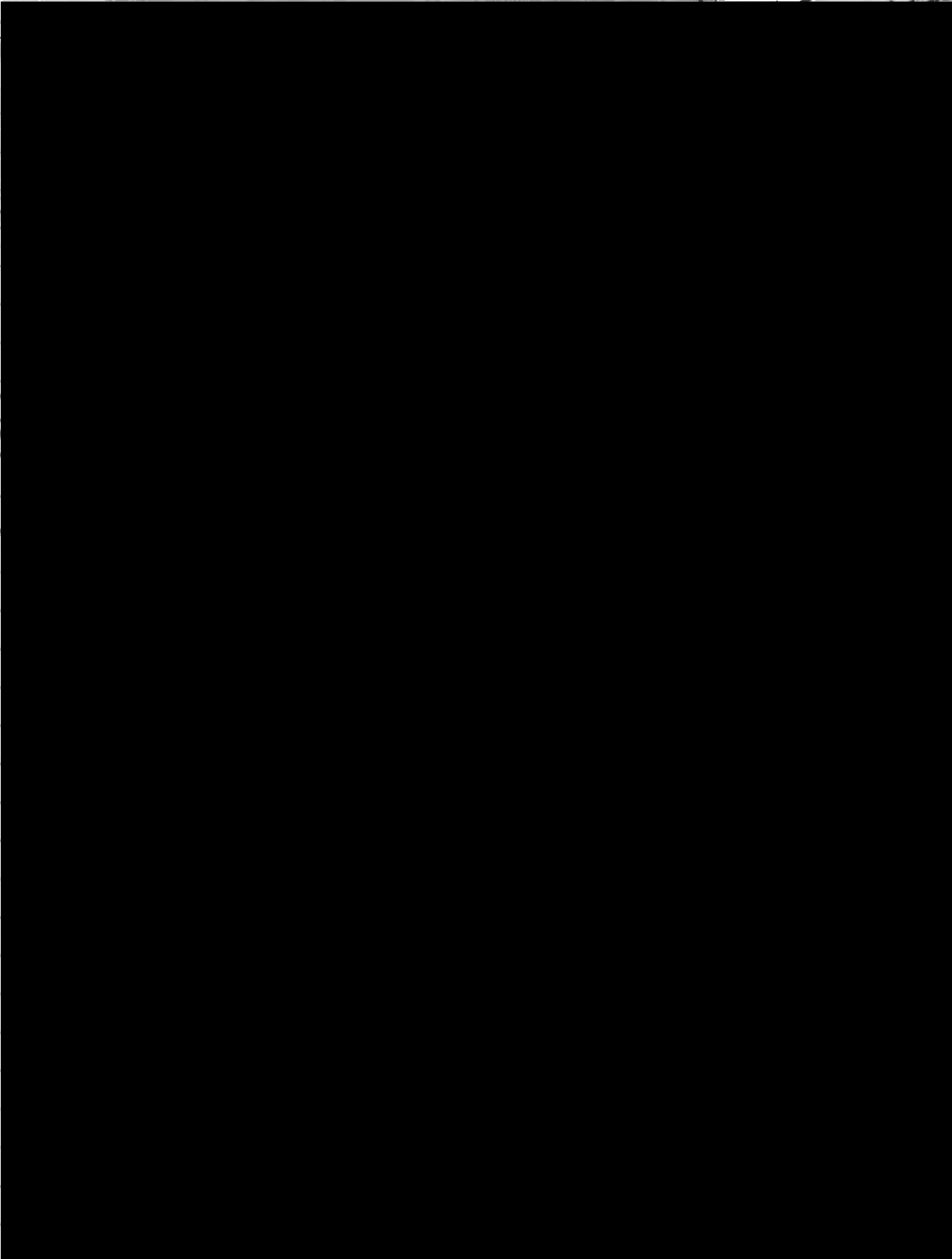


## APPENDIX

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*AGAINST*

PROPOSED DEVELOPMENT: WASTE TO ENERGY PLANT AT KINGMOOR, CARLISLE.

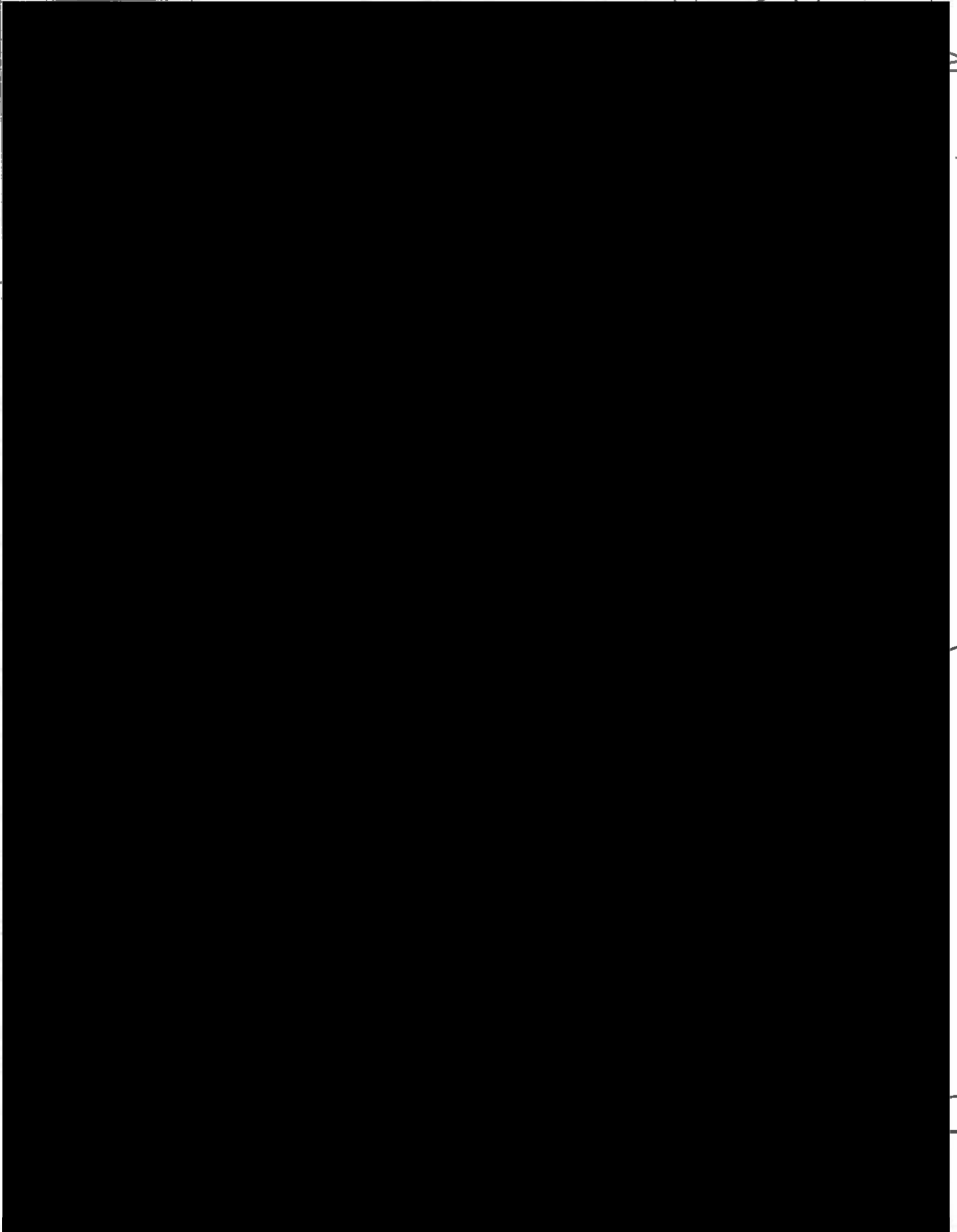
<i>NAME</i>	<i>ADDRESS</i>	<i>SIGNATURE</i>
		

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*AGAINST*

PROPOSED DEVELOPMENT: WASTE TO ENERGY PLANT AT KINGMOOR, CARLISLE.

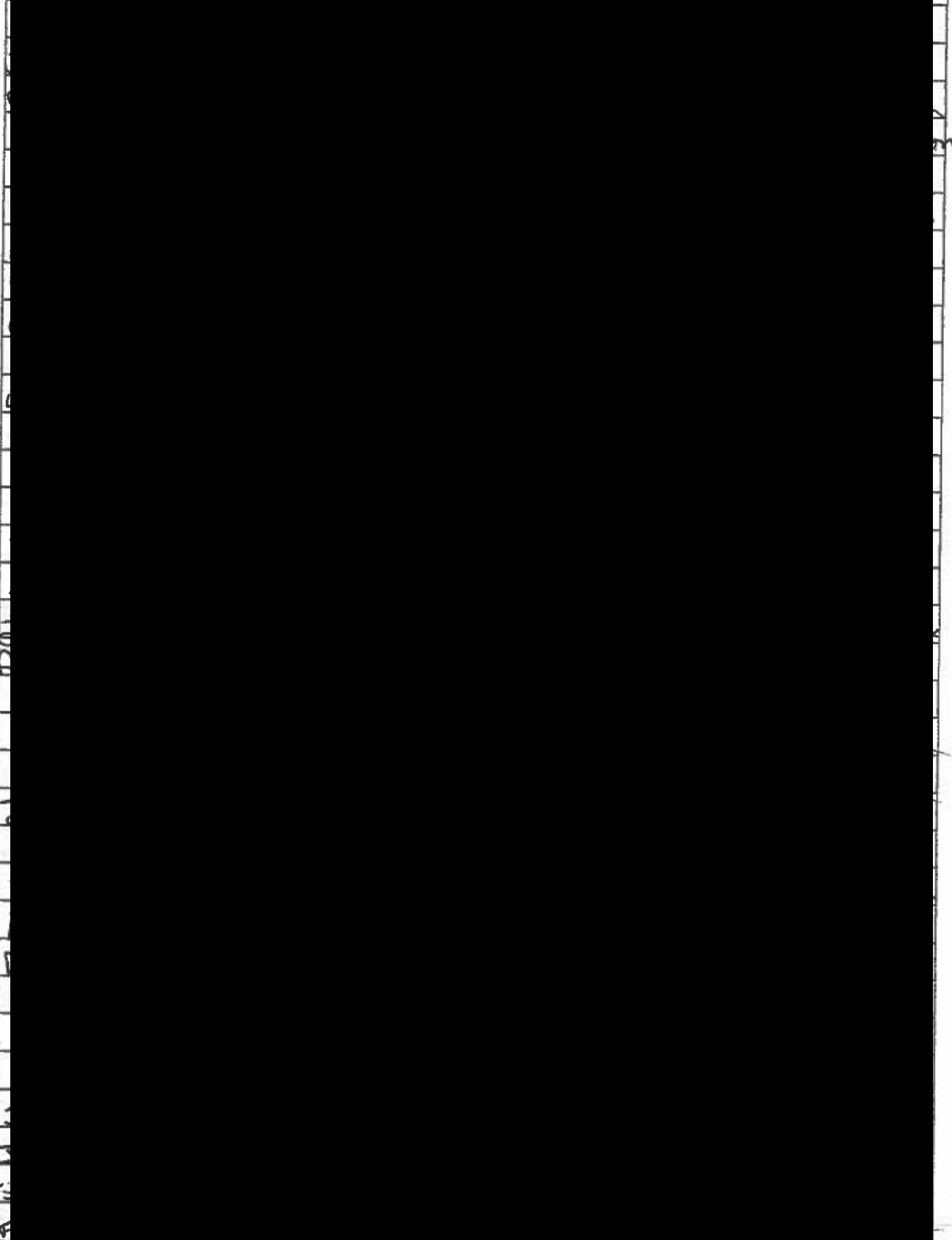
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**AGAINST**

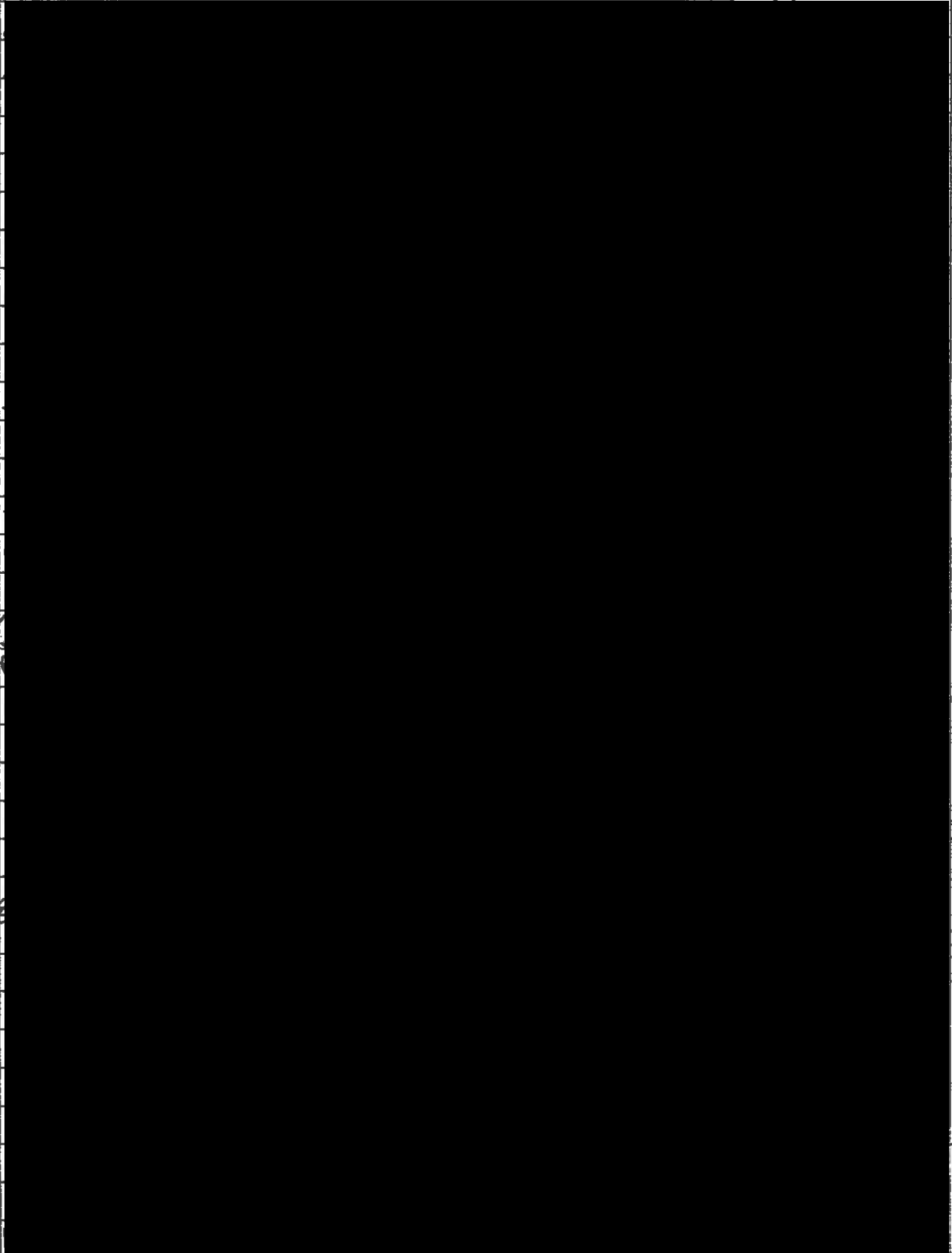
**PROPOSED DEVELOPMENT: WASTE TO ENERGY PLANT AT KINGMOOR, CARLISLE.**

<b>NAME</b>	<b>ADDRESS</b>	<b>SIGNATURE</b>
		

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TESTING AGAINST

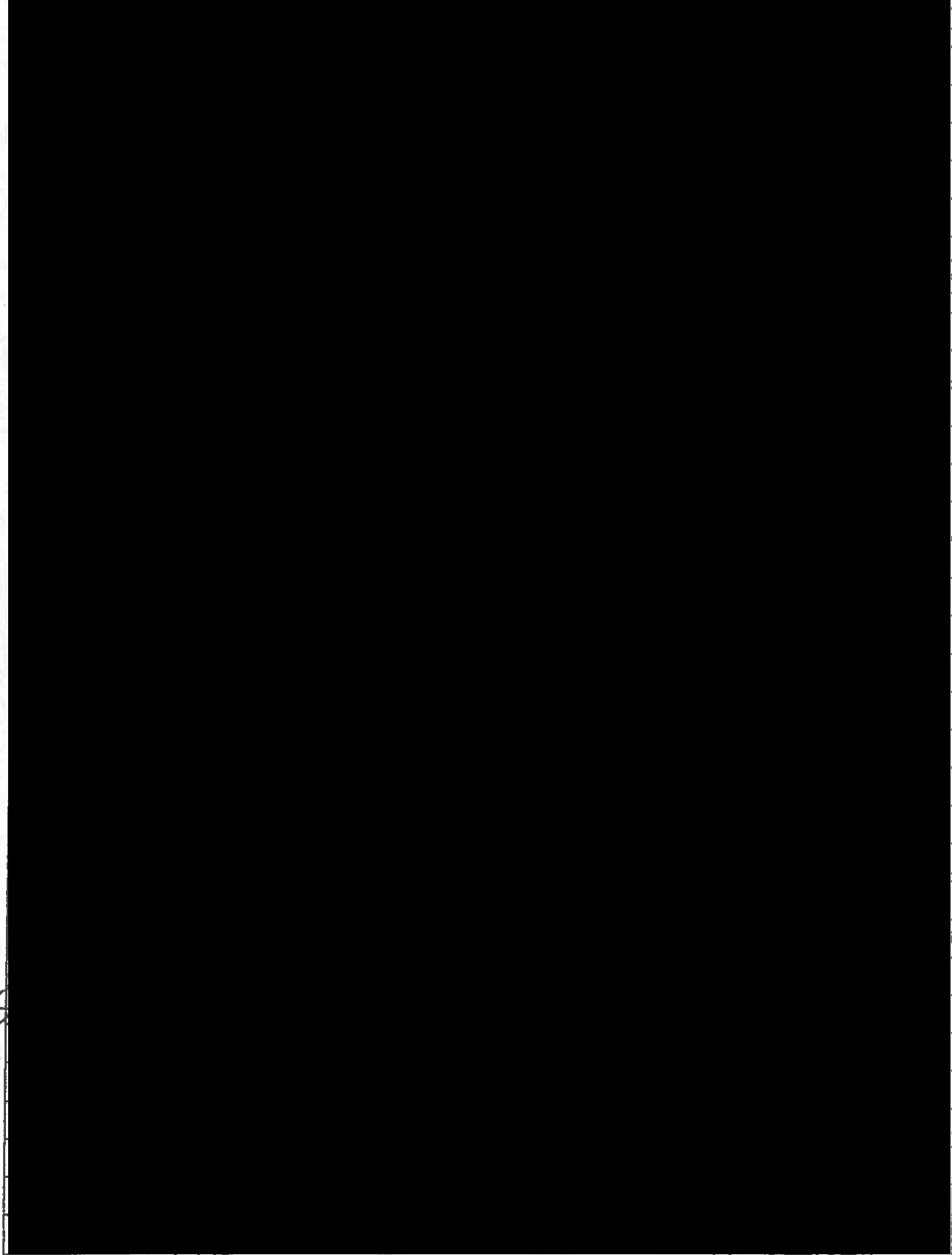
PROPOSED DEVELOPMENT: WASTE TO ENERGY PLANT AT KINGMOOR, CARLISLE.

NAME	ADDRESS	SIGNATURE
		

Copy

AGAINST

PROPOSED DEVELOPMENT: WASTE TO ENERGY PLANT AT KINGMOOR, CARLISLE.

NAME	ADDRESS	SIGNATURE
		

copy

AGAINST

PROPOSED DEVELOPMENT: WASTE TO ENERGY PLANT AT KINGMOOR, CARLISLE.

NAME	ADDRESS	SIGNATURE
		

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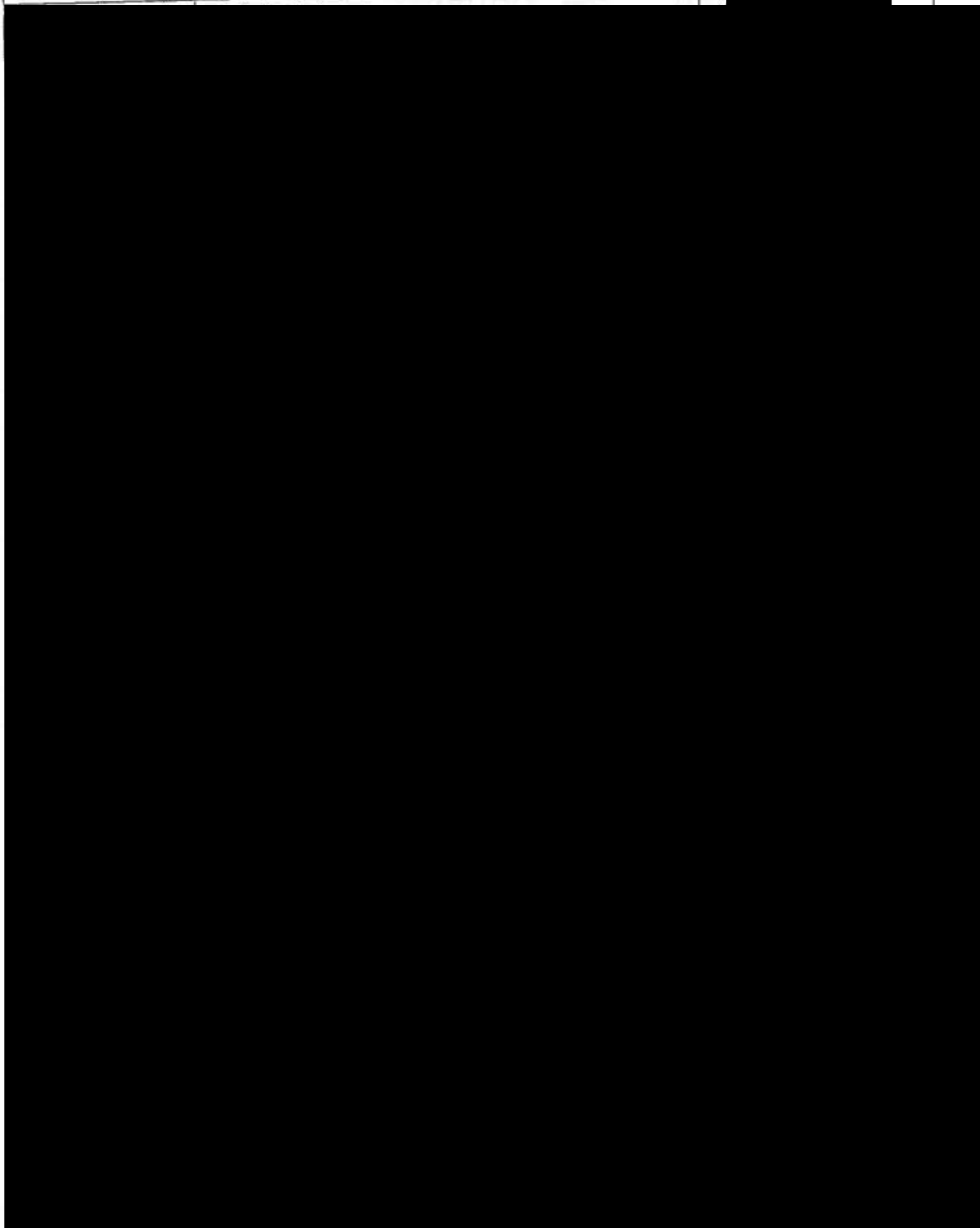


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*AGAINST*

**PROPOSED DEVELOPMENT: WASTE TO ENERGY PLANT AT KINGMOOR, CARLISLE.**

<i>NAME</i>	<i>ADDRESS</i>	<i>SIGNATURE</i>
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**FOR**

**PROPOSED DEVELOPMENT: WASTE TO ENERGY PLANT AT KINGMOOR, CARLISLE.**

[illegible]

Copy

AGAINST

PROPOSED DEVELOPMENT: WASTE TO ENERGY PLANT AT KINGMOOR, CARLISLE.

NAME	ADDRESS	SIGNATURE

S.JANUSZ

N.A.S  
6/7/15/16  
HD

Environmental Survey 2016

HD.

Issue 1

7/9/17/18/5/7/31/29/2/1/19



**FOR**

[illegible]

## **REPRESENTATION SUBMITTED ONLINE**

**PLANNING APPLICATION REFERENCE: 1/16/9005**

### **REPRESENTTEE CONTACT DETAILS**

Name: [REDACTED]  
Organisation:  
Position:  
Email address: [REDACTED]@hotmail.com  
Telephone No: [REDACTED]  
Fax No:  
Address:

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

### **DATE REPRESENTATION RECEIVED:**

**14 July 2016**

### **RESPONSE:**

**Object**

### **COMMENT:**

Although the proposed location is designated an industrial zone, it consists mainly of warehouses, showrooms and offices. There are no major combustion type processes here and it is beside a nature reserve and residential area. I worked in this estate for over 35 years and lived here for as long and believe this kind of development is totally out of place.

I have also noted that guidelines for this kind of development should not be located near schools, nature reserves or residential areas so find it incomprehensible that this is a preferred site.

I object to it in the strongest possible sense.

Having attended the consultation meeting held at Kingmoor School on 4<sup>th</sup> July I wish to object as a resident of the Lowry Hill Estate to this proposed development for the following reasons:

**Excessive noise, dust, smell or nuisance**

- Emissions - it is not clear what the stack emissions would comprise of and the risks to health they represent.
- Smells - generated both routinely and if the process is stopped for whatever reason.
- Noise – shredding of the incoming waste 24 hours a day.

We already often get smells from the abattoir and noise from other industrial units sited near to the estate.

I have no faith in computer models or the re-assurances given on these topics, after all the weather forecast is a computer model which is frequently wrong and once the plant is erected it is too late.

**Dominant and oppressive environment created by the proposal**

- The impact on the view when travelling down Lowry Hill Road, as per the artists impression submitted, ruins the character of what is an established and pleasant estate.

**Impact upon local wildlife and biodiversity**

- Let a nature reserve be so - no more encroachment on these precious places.

**Other**

- I am not aware of any other gasification plants operating successfully in the UK, but as a gas is being generated on site there must be explosion/fire risk?
- Why not site near Hespian instead, as all waste processing activity is based there now and near to the power grid and motorway networks?
- I am sure that this development will have an impact on house prices in the area in years to come – people pay more to live in pleasant places not suspecting that a monstrosity such as this might one day appear on their doorsteps.
- I feel that the District heating by product of the process will not be practical to implement on the grounds of cost and is a red herring.
- The proposed building is not in keeping with the area – just as the now Thomas Armstrong box building is not.
- Why not put far more effort in to reducing waste in the first place?

  
13/7/16

I wish to object as a resident of the Lowry Hill Estate to this proposed development for the following reasons:

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14/7/16



## **REPRESENTATION SUBMITTED ONLINE**

**PLANNING APPLICATION REFERENCE:** 1/16/9005

### **REPRESENTTEE CONTACT DETAILS**

Name: [REDACTED]  
 Organisation:  
 Position:  
 Email address: [REDACTED]@gmail.com  
 Telephone No: [REDACTED]  
 Fax No:  
 Address:

[REDACTED]  
 [REDACTED]  
 [REDACTED]  
 [REDACTED]  
 [REDACTED]

### **DATE REPRESENTATION RECEIVED:**

**16 July 2016**

### **RESPONSE:**

**Object**

### **COMMENT:**

design out of keeping with the character the area:

All the other buildings on the industrial estate are depots and warehouses and not working plants.

Dominant and oppressive environment created by the proposal:

The building and chimney will be visible from many areas of Lowry Hill especially in the winter when the trees have shed their leaves.

Excessive noise, dust, smell or nuisance:

I am concerned about the noise that the constant stream of lorries will make. I can hear the west coast railway and that is only a few a day. I am also concerned about what will happen if there is a breakdown in that plant and there is a stack of lorries waiting to unload. This could lead to excessive smell and also vermin.

Highway safety or traffic impact:

There is already quite a volume of traffic and this can only add to it.

Impact upon Listed buildings, conservation areas or mature trees:

This is far too close to Kingmoor nature reserve which is a very popular spot with families. Considering no one is allowed to alter any of the trees without considerable red tape I would have thought that the proximity was a non starter. The effect on the wildlife would also be considerable.

Its position in respect of government planning policy:

I am very concerned that the emission levels will not be as low as stated. It is very disturbing when you see the results from a similar plant near Dumfries which has often failed to keep to the required emission standards. The guidelines suggest that plants of this type should not be built near schools residential areas or local nature reserves and this proposed to be built near all three.

Visual or Landscape impact:

I feel that this plant is going to be visible from many parts of our estate and it is going to spoil what is a very attractive place to live. The height of both the building and the chimney are such that it will be the most noticeable thing on Lowry hill.

**REPRESENTATION SUBMITTED ONLINE****PLANNING APPLICATION REFERENCE: 1/16/9005****REPRESENTTEE CONTACT DETAILS**

Name: [REDACTED]  
Organisation:  
Position:  
Email address: [REDACTED]@yahoo.com  
Telephone No:  
Fax No:  
Address:

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

**DATE REPRESENTATION RECEIVED:****16 July 2016****RESPONSE:****Object****COMMENT:**

## **REPRESENTATION SUBMITTED ONLINE**

**PLANNING APPLICATION REFERENCE:** 1/16/9005

### **REPRESENTTEE CONTACT DETAILS**

Name: [REDACTED]  
Organisation:  
Position:  
Email address: [REDACTED]@gmail.com  
Telephone No: [REDACTED]  
Fax No:  
Address:

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

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**16 July 2016**

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**REPRESENTATION SUBMITTED ONLINE**

**PLANNING APPLICATION REFERENCE: 1/16/9005**

**REPRESENTTEE CONTACT DETAILS**

Name: [REDACTED]  
Organisation:  
Position:  
Email address: [REDACTED]@yahoo.com  
Telephone No:  
Fax No:  
Address:

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

**DATE REPRESENTATION RECEIVED:**

**16 July 2016**

**RESPONSE:**

**Object**

**COMMENT:**

## **REPRESENTATION SUBMITTED ONLINE**

**PLANNING APPLICATION REFERENCE: 1/16/9005**

### **REPRESENTTEE CONTACT DETAILS**

Name: [REDACTED]  
Organisation:  
Position:  
Email address: [REDACTED]@gmail.com  
Telephone No: [REDACTED]  
Fax No:  
Address:

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

### **DATE REPRESENTATION RECEIVED:**

**16 July 2016**

### **RESPONSE:**

**Object**

### **COMMENT:**

Design out of keeping with the character of the area: The size of the building and chimney are far in excess of the other buildings on the industrial estate. This will create a dominant and oppressive environment particularly when the trees have shed their leaves.

The waste plant will create excessive noise which will be heard by the Lowry Hill housing estate, and dust/smell will be a continual problem. We will never be able to enjoy our gardens again.

The traffic impact will be an added problem, causing noise throughout the day and night.

The proposed plant is far too close to the Kingmoor Nature Reserve and will have a detrimental effect on wildlife.

I am concerned about the pollution levels as other similar facilities have repeatedly failed to keep to the required emissions standards. Despite reassurances from the developers, this cannot be guaranteed. So close to the Lowry Hill residential area and Kingmoor School is completely unacceptable.

The visual impact of the building and chimney will be very prominent from Lowry Hill Road and from the Nature Reserve. It will be like living with a huge

monstrosity towering over us, visible as you enter the residential area and from several gardens.

I wish to object to the proposal at this location, and feel it would be better situated in a more remote area, not overpowering a beautiful housing estate where many residents have lived since 1966.



## REPRESENTATION SUBMITTED ONLINE

**PLANNING APPLICATION REFERENCE:** 1/16/9005

### REPRESENTTEE CONTACT DETAILS

Name: [REDACTED]  
 Organisation:  
 Position:  
 Email address: [REDACTED]@hotmail.com  
 Telephone No: [REDACTED]  
 Fax No:  
 Address: [REDACTED]  
 [REDACTED]  
 [REDACTED]  
 [REDACTED]  
 [REDACTED]

### DATE REPRESENTATION RECEIVED:

17 July 2016

### RESPONSE:

**Object**

### COMMENT:

My wife and myself would like to raise a formal and strong objection to the application numbered PL\1572\05(1/16/9005) on the undermentioned grounds.

1. Position in respect of Government Planning Policy - plans breach the EfW Development guidance note 4.2.6 which says that ideally, the site should not be located within close proximity to:- residential properties, schools or nature reserves
2. Excessive noise, dust, smell or nuisance ? it is quite apparent that from reports from other incineration plants in the UK and around the world that despite stringent regulation and monitoring, breaches and failures occur regularly. This site is proposed to be operational 24/7. There is no doubt that this will increase noise levels for local residents, particularly at night, not only from the plant but also the heavy volume of HGV's and reversing alarms. There are also risks of plant breakdown when waste will have to wait to enter the plant buildings. This will create excessive smell s for residents particularly with strong winds.

The whole incineration process results in ash residues, some of which are hazardous. Should these escape into the atmosphere and be carried by wind and be deposited on residential areas, there could be severe damage to property and to the health of local residents. We also have concerns about the IBA (Incinerator Bottom Ash) which at the end of the whole process, still has to be disposed of. Whether this is by transfer to Landfill or re-processing back into applications such as aggregate,

concrete, etc, it still has to be moved from site with the then added risks of dangerous dust emissions which could be deposited locally.

3. Impact on Conservation areas ? the local Nature Reserve is used by large numbers for recreation, dog walking and more importantly, on a weekly basis by local school children for educational purposes ? the visual impact of this monstrosity of a plant combined with the noise, dust and smell risk will clearly have a negative impact and potential health risks.

4. Highway safety and traffic impact ? it is suggested that 4/6 large HGV's will use the plant every hour, 24 hours a day. Although most of this traffic should avoid residential areas by using the CNDR (Carlisle Northern Development Route), there will be occasions when due to road closures, these vehicles are diverted through what are already busy residential areas North of the city adding to current congestion issues which will only increase with further planned housing sites in the Kingstown areas.

5. Secrecy ? we are concerned that the general public have been kept very much in the dark about this application until the very last minute. In fact, 2 out of 3 people on the nearest estate were, until a leaflet drop this week, still unaware of the planned incinerator. One article in the News and Star paper in April announced that Verus Energy were holding a drop in event to explain their plans at the Kingmoor Business and Development centre at the local school ? this was not only in a paper that very few people read but also gave only a weeks notice. Even the school through whom the room was booked for the ?event? did not know what the room had been booked for. A hand full of houses only received a letter from Verus or their agents about the plans ? why not the whole estate ? it all suggests to us that the parties involved in this planning application wanted as few people aware as possible

██████████

**REPRESENTATION SUBMITTED ONLINE****PLANNING APPLICATION REFERENCE: 1/16/9005****REPRESENTTEE CONTACT DETAILS**

Name: [REDACTED]  
Organisation:  
Position:  
Email address: [REDACTED]@gmail.com  
Telephone No:  
Fax No:  
Address:

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

**DATE REPRESENTATION RECEIVED:****17 July 2016****RESPONSE:****Object****COMMENT:**

I wish to object because of the proximity of the proposed plant to the residential area of Lowry Hill (as a resident) including the Kingmoor Schools (where I am a governor). I do not consider that the environmental safety of the proposals has been proved beyond doubt. The proposals will potentially create toxins that may pollute the neighbouring areas and is not sufficiently distant from the local community. As such I consider that the application should be refused.

## **REPRESENTATION SUBMITTED ONLINE**

**PLANNING APPLICATION REFERENCE:** 1/16/9005

### **REPRESENTTEE CONTACT DETAILS**

Name: [REDACTED]  
 Organisation:  
 Position:  
 Email address: [REDACTED]@outlook.com  
 Telephone No: [REDACTED]  
 Fax No:  
 Address:

[REDACTED]  
 [REDACTED]  
 [REDACTED]  
 [REDACTED]  
 [REDACTED]

### **DATE REPRESENTATION RECEIVED:**

**17 July 2016**

### **RESPONSE:**

**Object**

### **COMMENT:**

I would like to raise an objection to application PL\1572\05(1/16/9005) on the following grounds:

**Compliance with the Local Plan**

The current site is identified as the preferred location in the 2012 Site Allocations Policies and Proposals Map. Due to the government new development plan system this plan has been abandoned and there seems to be a vacuum with regards to detailed County planning. How was it decided that the industrial estate would be the best area for the plant to be situated?

**Design out of keeping with the character of the area**

Although the proposed location is an industrial estate, types of development are currently mainly office accommodation, warehousing and showrooms. Apparently this is the first development of its type in the country and it would be the first major combustion type process on the estate. It is close to a residential area, junior/primary school and adjacent to the local nature reserve.

**Dominant and oppressive environment created by the proposal**

The proposed development's boiler house has a height of approximately 39 metres with the chimney reaching a height of 70 metres. This will have a huge impact for

residents of Lowry Hill as the structure will be visible from elevated areas of the estate. Also the beauty of the Nature Reserve would be blighted by this structure.

Excessive Noise, dust, smell or nuisance

It is proposed that the incinerator is to be serviced with 100 HGV deliveries per day. Each of these deliveries will require the HGV's to reverse into the reception hall with the accompanying reversal noise from the vehicles. It is concerning that this will cause significant disturbance on an otherwise quiet area especially at night, weekends and holiday periods. It is also concerning that the incinerator is only metres from the nearest residential accommodation for the above cited reasons.

As this type of technology is presently untested in the UK I am concerned that it will result in frequent shutdowns for maintenance or breakdown which would result in a build up of pungent waste waiting to be incinerated which in turn would lead to an increase of rodents and flies which can be hazardous to public health.

Impact upon Conservation areas

The development is very close to the Kingmoor Nature Reserve, enjoyed by many people in the City for family or dog walks. I believe that as the development is untested in the UK many people will be concerned about the safety of the plant and may not use the Nature Reserve any more.

Its position in respect of Government Planning Policy

WRAP EfW guidelines indicate that facilities such as the proposed incinerator should not be located near residential areas, schools or local nature reserves.

It concerns local residents the although pollution levels proposed may be lower the pollution arising from Kingmoor Road, there is a EfW facility located near Dumfries which has repeatedly failed to keep to the required emission standards.

As a resident of the City who has lived here all my life I am genuinely concerned about the negative impact the energy recovery facility will have on both residents and potential tourists to the area with Carlisle potentially being known as the waste City.

**REPRESENTATION SUBMITTED ONLINE****PLANNING APPLICATION REFERENCE: 1/16/9005****REPRESENTTEE CONTACT DETAILS**

Name: [REDACTED]  
Organisation:  
Position:  
Email address: [REDACTED]@hotmail.co.uk  
Telephone No: [REDACTED]  
Fax No:  
Address:

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

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Excessive Noise, dust, smell or nuisance

It is proposed that the incinerator is to be serviced with 100 HGV deliveries per day. Each of these deliveries will require the HGV's to reverse into the reception hall with the accompanying reversal noise from the vehicles. It is concerning that this will cause significant disturbance on an otherwise quiet area especially at night, weekends and holiday periods. It is also concerning that the incinerator is only metres from the nearest residential accommodation for the above cited reasons.

As this type of technology is presently untested in the UK I am concerned that it will result in frequent shutdowns for maintenance or breakdown which would result in a build up of pungent waste waiting to be incinerated which in turn would lead to an increase of rodents and flies which can be hazardous to public health.

Impact upon Conservation areas

The development is very close to the Kingmoor Nature Reserve, enjoyed by many people in the City for family or dog walks. I believe that as the development is untested in the UK many people will be concerned about the safety of the plant and may not use the Nature Reserve any more.

Its position in respect of Government Planning Policy

WRAP EfW guidelines indicate that facilities such as the proposed incinerator should not be located near residential areas, schools or local nature reserves.

It concerns local residents the although pollution levels proposed may be lower the pollution arising from Kingmoor Road, there is a EfW facility located near Dumfries which has repeatedly failed to keep to the required emission standards.

As a resident of the City who has lived here all my life I am genuinely concerned about the negative impact the energy recovery facility will have on both residents and potential tourists to the area with Carlisle potentially being known as the waste City.

## **REPRESENTATION SUBMITTED ONLINE**

**PLANNING APPLICATION REFERENCE:** 1/16/9005

### **REPRESENTTEE CONTACT DETAILS**

Name: [REDACTED]  
 Organisation:  
 Position:  
 Email address: [REDACTED]@hotmail.co.uk  
 Telephone No: [REDACTED]  
 Fax No:  
 Address:

[REDACTED]  
 [REDACTED]  
 [REDACTED]  
 [REDACTED]  
 [REDACTED]

### **DATE REPRESENTATION RECEIVED:**

**17 July 2016**

### **RESPONSE:**

**Object**

### **COMMENT:**

I would like to raise an objection to application PL\1572\05(1/16/9005) on the following grounds:

Compliance with the Local Plan

The current site is identified as the preferred location in the 2012 Site Allocations Policies and Proposals Map. Due to the government new development plan system this plan has been abandoned and there seems to be a vacuum with regards to detailed County planning. How was it decided that the industrial estate would be the best area for the plant to be situated?

Design out of keeping with the character of the area

Although the proposed location is an industrial estate, types of development are currently mainly office accommodation, warehousing and showrooms. Apparently this is the first development of its type in the country and it would be the first major combustion type process on the estate. It is close to a residential area, junior/primary school and adjacent to the local nature reserve.

Dominant and oppressive environment created by the proposal

The proposed development's boiler house has a height of approximately 39 metres with the chimney reaching a height of 70 metres. This will have a huge impact for residents of Lowry Hill as the structure will be visible from elevated areas of the estate. Also the beauty of the Nature Reserve would be blighted by this structure.



Excessive Noise, dust, smell or nuisance

It is proposed that the incinerator is to be serviced with 100 HGV deliveries per day. Each of these deliveries will require the HGV's to reverse into the reception hall with the accompanying reversal noise from the vehicles. It is concerning that this will cause significant disturbance on an otherwise quiet area especially at night, weekends and holiday periods. It is also concerning that the incinerator is only metres from the nearest residential accommodation for the above cited reasons.

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**PLANNING APPLICATION REFERENCE:**     **1/16/9005**

### **REPRESENTTEE CONTACT DETAILS**

Name: [REDACTED]  
 Organisation:  
 Position:  
 Email address: [REDACTED]@hotmail.co.uk  
 Telephone No:  
 Fax No:  
 Address:

[REDACTED]  
 [REDACTED]  
 [REDACTED]  
 [REDACTED]

### **DATE REPRESENTATION RECEIVED:**

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### **RESPONSE:**

**Object**

### **COMMENT:**

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As this type of technology is presently untested in the UK I am concerned that it will result in frequent shutdowns for maintenance or breakdown which would result in a build up of pungent waste waiting to be incinerated which in turn would lead to an increase of rodents and flies which can be hazardous to public health.

Impact upon Conservation areas

The development is very close to the Kingmoor Nature Reserve, enjoyed by many people in the City for family or dog walks. I believe that as the development is untested in the UK many people will be concerned about the safety of the plant and may not use the Nature Reserve any more.

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WRAP EfW guidelines indicate that facilities such as the proposed incinerator should not be located near residential areas, schools or local nature reserves.

It concerns local residents the although pollution levels proposed may be lower the pollution arising from Kingmoor Road, there is a EfW facility located near Dumfries which has repeatedly failed to keep to the required emission standards.

As a resident of the City who has lived here all my life I am genuinely concerned about the negative impact the energy recovery facility will have on both residents and potential tourists to the area with Carlisle potentially being known as the waste City.

**REPRESENTATION SUBMITTED ONLINE****PLANNING APPLICATION REFERENCE: 1/16/9005****REPRESENTTEE CONTACT DETAILS**

Name: [REDACTED]  
Organisation:  
Position:  
Email address: [REDACTED]@hotmail.co.uk  
Telephone No:  
Fax No:  
Address:

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

**DATE REPRESENTATION RECEIVED:****17 July 2016****RESPONSE:****Object****COMMENT:**

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**REPRESENTATION SUBMITTED ONLINE****PLANNING APPLICATION REFERENCE: 1/16/9005****REPRESENTTEE CONTACT DETAILS**

Name: [REDACTED]  
Organisation:  
Position:  
Email address: [REDACTED]@fsmail.net  
Telephone No: [REDACTED]  
Fax No:  
Address:

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

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We would like to raise an objection to the application PL\1572\05 (1/16/9005) on the following grounds:

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Design out of keeping with the character of the area. Despite the fact that the proposed location is in an industrial estate the types of development on the estate are mainly warehousing, showrooms and office accommodation. This would be the first major combustion type of process in the estate and it is adjacent to a local nature reserve and close to a residential area with a junior and primary school.

Dominant and oppressive environment created by the proposal. This development includes very large structures which will have a huge impact on the outlook from the elevated areas of Lowry Hill Road and some locations around the Kingmoor Nature Reserve.

Excessive noise, dust, smell or nuisance. The plan is to service this incinerator with 100 HGV deliveries per day. Each of these deliveries will require the reversing of the HGV into the reception hall with accompanying reversing beeps. We are concerned that this will cause significant disturbance and distress especially when this occurs during the night, over weekends and during holiday periods. We are also concerned that the distance from the nearest residential accommodation (730m) means that the noise of the waste treatment and the generator will cause disturbance especially during the night. We are concerned that this type of technology (untested in the UK) will inevitably result in frequent shutdowns for maintenance or breakdown. We are concerned that at these times there will be a build up of smelly waste waiting to be incinerated (as occurred at the Dumfries EfW plan) and that this will increase flies and rodents in the area.

Impact upon Conservation areas. The development is very close (perhaps 300-400m) to the Kingmoor Nature Reserve, a highly valued area for dog walkers and family walks. We are concerned that the outlook and perceived safety concerns will affect the value of this reserve.

Its position in respect of Government Planning Policy. There is considerable concern from the residents that while the pollution levels proposed may be lower than the pollution arising from Kingmoor Road, there is a EfW facility near Dumfries that has repeatedly failed to keep to the required emissions standards. It has proved difficult to do anything about this problem within a reasonable time frame. WRAP EfW guidelines indicate that these facilities should not be located near residential areas, school or local nature reserves. The proposed facility is very close to Kingmoor nature reserve, Kingmoor Junior School and the Lowry Hill residential estate.

Visual or Landscape Impact The image on the planning proposal (KNG-017cG Visuals A3.indd) gives some indication of the significant visual impact to Lowry Hill residents. This impact will be even greater at some of the entrances to and exits from the Kingmoor Nature Reserve.

**REPRESENTATION SUBMITTED ONLINE****PLANNING APPLICATION REFERENCE: 1/16/9005****REPRESENTTEE CONTACT DETAILS**

Name: [REDACTED]  
Organisation:  
Position:  
Email address: [REDACTED]@fsmail.net  
Telephone No: [REDACTED]  
Fax No:  
Address:

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

**DATE REPRESENTATION RECEIVED:****17 July 2016****RESPONSE:****Object****COMMENT:**

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Dominant and oppressive environment created by the proposal. This development includes very large structures which will have a huge impact on the outlook from the elevated areas of Lowry Hill Road and some locations around the Kingmoor Nature Reserve.

Excessive noise, dust, smell or nuisance. The plan is to service this incinerator with 100 HGV deliveries per day. Each of these deliveries will require the reversing of the HGV into the reception hall with accompanying reversing beeps. We are concerned that this will cause significant disturbance and distress especially when this occurs during the night, over weekends and during holiday periods. We are also concerned that the distance from the nearest residential accommodation (730m) means that the noise of the waste treatment and the generator will cause disturbance especially during the night. We are concerned that this type of technology (untested in the UK) will inevitably result in frequent shutdowns for maintenance or breakdown. We are concerned that at these times there will be a build up of smelly waste waiting to be incinerated (as occurred at the Dumfries EfW plan) and that this will increase flies and rodents in the area.

Impact upon Conservation areas. The development is very close (perhaps 300-400m) to the Kingmoor Nature Reserve, a highly valued area for dog walkers and family walks. We are concerned that the outlook and perceived safety concerns will affect the value of this reserve.

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**REPRESENTATION SUBMITTED ONLINE**

**PLANNING APPLICATION REFERENCE:** 1/16/9005

**REPRESENTTEE CONTACT DETAILS**

Name: [REDACTED]  
Organisation:  
Position:  
Email address: [REDACTED]@googlemail.com  
Telephone No:  
Fax No:  
Address:  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

**DATE REPRESENTATION RECEIVED:**

17 July 2016

**RESPONSE:**

**Object**

**COMMENT:**

This development includes very large structures which will have a huge impact on the outlook from the elevated areas of Lowry Hill Road and some locations around the Kingmoor Nature Reserve. Also there could be excessive noise, dust and smells.

**REPRESENTATION SUBMITTED ONLINE****PLANNING APPLICATION REFERENCE: 1/16/9005****REPRESENTATIVE CONTACT DETAILS**

Name: [REDACTED]  
Organisation:  
Position:  
Email address: [REDACTED]@gmail.com  
Telephone No:  
Fax No:  
Address:  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

**DATE REPRESENTATION RECEIVED:****17 July 2016****RESPONSE:****Object****COMMENT:**

I wish to object to the proposal to build an energy Waste plant in the north of the city PL\1572\05 (1/16/9005).

My Objection is that this type of development will have a negative impact to the area as a whole.

The size of the building will have a dominant visual impact to the area which will be seen from local residential areas and kingmore nature reserve. The increase in noise and pollution from HGV traffic on surrounding roads I believe will have an impact to the environment and to add to this the excessive noise and dust that the plant will create will impact the quality of life to local residents.

Regards,

[REDACTED]

Application Number

PL/1572/05(1/16/9005

REGARDING THE PROPOSED KINGMOOR ENERGY RECOVERY FACILITY

I am a member of the Lowry Hill Residents Association



Please tick ONE of the following TWO boxes:

I am in favour of the proposal to build an Energy Recovery Facility at the proposed site in Kingmoor Park.



I am against the proposal to build an Energy Recovery Facility at the proposed site in Kingmoor Park.



ENVIRONMENT  
DIRECTORATE

15 JUL 2016

ENVIRONMENT  
UNIT

I have the following concerns regarding this proposal:

Please write down your own concerns or circle any of those listed:

- |  |  |
|--|--|
| <input checked="" type="radio"/> Location and closeness to housing | <input checked="" type="radio"/> Impact on House Prices                  |
| <input checked="" type="radio"/> Effects of Air pollution          | <input checked="" type="radio"/> Reputation of Carlisle 'the waste city' |
| <input checked="" type="radio"/> Size of building and chimney      | <input checked="" type="radio"/> Increased Noise                         |
| <input checked="" type="radio"/> Impact on retail/tourism          | <input checked="" type="radio"/> Greenhouse gasses                       |
| <input checked="" type="radio"/> Impact on transport and roads     | <input checked="" type="radio"/> Nearness to schools                     |
| <input checked="" type="radio"/> Plant shutdown issues             | <input checked="" type="radio"/> Effects on health                       |
| <input type="radio"/> Possible alternative sites                   |  |

Other concerns:

It seems the majority is against the waste plant. I think the best way is to withdraw the application, and do not let the people of Lowry Hill and the surrounding villages worry about the future, not knowing the long term effect.

I would like to make the following comments:

We do not know what will happen in the long run. Serious health problems can happen in 10 or 20 years. It is the first of the waste plant in U.K. How can you tell it is safe?

copy 4<sup>th</sup> July.

Application Number  
PL\1572\05-11/16/9005

10 May 2016

Dear Sir

Concerning the proposed Power Plant at  
Kingmoor Park

I attended the Consultation meeting on 4<sup>th</sup> May held at the Kingmoor Business Centre,  
Lowry Hill. It was for me a surprise to hear about the proposal, just a day before the meeting.

I am totally against it, for the following reasons:

The development is too near several residential areas, including Lowry Hill, Kingstown, Belah,  
Cargo, Grindsdale and others, and all the houses would suffer a diminution in price. Although we  
were told that there would be no pollution, but how can we be sure?

ERF will not say anything, but there could be a delayed reaction on people's health. Nobody knows  
yet what kind of influence it will have in 10 or 20 years time.

The storage of gas presents the danger of a serious explosion.

I see no advantage for people around the Power Plant.

I know there is a need for more provision of gas and electricity and that it has to come from  
somewhere, but not so close to residential areas. I am completely against it. We do not know what  
will happen in the long run. I have experience of schemes seem to be safe at the time, but after 10  
or 20 years serious problems have arisen.

I hope you will seriously consider my concern along with any other comments which you will  
receive.

Yours faithfully

With the form I send a copy of the letter  
which I send to you on 10<sup>th</sup> May, in case  
you have not received it. My name  
is still the same.

Application No- PH/1572/65 (1/16/9005)

REGARDING THE PROPOSED KINGMOOR ENERGY RECOVERY FACILITY

I am a member of the Lowry Hill Residents Association



Please tick ONE of the following TWO boxes:

I am in favour of the proposal to build an Energy Recovery Facility at the proposed site in Kingmoor Park.



I am against the proposal to build an Energy Recovery Facility at the proposed site in Kingmoor Park.



I have the following concerns regarding this proposal:

Please write down your own concerns or circle any of those listed:

☒ Location and closeness to housing

➤ Effects of Air pollution

☒ Size of building and chimney

➤ Impact on retail/tourism

➤ Impact on transport and roads

➤ Plant shutdown issues

☒ Possible alternative sites

☒ Impact on House Prices

➤ Reputation of Carlisle - 'the waste city'

☒ Increased Noise

➤ Greenhouse gasses

☒ Nearness to schools

➤ Effects on health



Other concerns:

little or no information on any difficulties with comparable devices in the continent -

I would like to make the following comments:

~~long~~ term long-term effects not known.

[REDACTED]

---

From: [REDACTED]@tesco.net>  
Sent: 11 July 2016 15:33  
To: Development Control - Planning Dept address  
Subject: Planning application number: PL\1572\05 (1/16/9005)

Dear Sirs,

**Planning application number: PL\1572\05 (1/16/9005)**

I object to the proposal to build an Energy from Waste plant at Kingmoor Park.

There is a need to deal with the problems of Landfill and Energy Security.

BUT

The site proposed is unsuitable for the following reasons

1. It is too close to homes and schools.
2. The design as seen from Lowry Hill Estate is out of keeping with the character of the area.
3. There will be nuisance from noise and smell. Flue effluents will be even worse in periods of temperature inversion. The danger of toxic waste cannot be ruled out, despite the developers' assurances.
4. Traffic locally will be increased.  
Imagine Eden Bridge closed as it was at the end of last year.
5. It is too close to Kingmoor Nature Reserve.

AND

The proposal is for a method not yet proven to be safe and by a developer with no proven pedigree.

Yours faithfully

[REDACTED]  
[REDACTED]

WARNING: Email attachments may contain malicious and harmful software. If this email is unsolicited and contains an attachment DO NOT open the attachment and advise the ICT Service Desk immediately. Never open an attachment or click on a link within an email if you are not expecting it or it looks suspicious.

[REDACTED]

---

From: [REDACTED]@evangelical-times.org>  
Sent: 11 July 2016 16:27  
To: Development Control - Planning Dept address  
Subject: Objection to PL\1572\05 (1/16/9005)

Dear Sir/Madam,

We would like to raise an objection to the application PL\1572\05 (1/16/9005) on the following grounds:

Compliance with the Local Plan (i.e. [Local Planning Policy](#))

The current site is identified as the preferred location in the 2012 Site Allocations Policies and Proposals Map due to governments new development plan system this plan has been abandoned and there seems to be a vacuum with regards to detailed County planning.

Design out of keeping with the character of the area.

Despite the fact that the proposed location is in an industrial estate the types of development on the estate are mainly warehousing, showrooms and office accommodation. This would be the first major combustion type of process in the estate and it is adjacent to a local nature reserve and close to a residential area with a junior and primary school.

Dominant and oppressive environment created by the proposal.

This development includes very large structures which will have a huge impact on the outlook from the elevated areas of Lowry Hill Road and some locations around the Kingmoor Nature Reserve.

Excessive noise, dust, smell or nuisance.

The plan is to service this incinerator with 100 HGV deliveries per day. Each of these deliveries will require the reversing of the HGV into the reception hall with accompanying reversing beeps. We are concerned that this will cause significant disturbance and distress especially when this occurs during the night, over weekends and during holiday periods.

We are also concerned that the distance from the nearest residential accommodation (730m) means that the noise of the waste treatment and the generator will cause disturbance especially during the night.

We are concerned that this type of technology (untested in the UK) will inevitably result in frequent shutdowns for maintenance or breakdown. We are concerned that at these times there will be a build up of smelly waste waiting to be incinerated (as occurred at the Dumfries EfW plan) and that this will increase flies and rodents in the area.



### Impact upon Conservation areas.

The development is very close (perhaps 300-400m) to the Kingmoor Nature Reserve, a highly valued area for dog walkers and family walks. We are concerned that the outlook and perceived safety concerns will affect the value of this reserve.

### Its position in respect of Government Planning Policy.

There is considerable concern from the residents that while the pollution levels proposed may be lower than the pollution arising from Kingmoor Road, there is a EfW facility near Dumfries that has repeatedly failed to keep to the required emissions standards. It has proved difficult to do anything about this problem within a reasonable timeframe.

WRAP EfW guidelines indicate that these facilities should not be located near residential areas, school or local nature reserves.

The proposed facility is very close to Kingmoor nature reserve, Kingmoor Junior School and the Lowry Hill residential estate.

### Visual or Landscape Impact

The image on the planning proposal (KNG-017cG Visuals A3.indd) gives some indication of the significant visual impact to Lowry Hill residents. This impact will be even greater at some of the entrances to and exits from the Kingmoor Nature Reserve.

This objection was supported overwhelmingly at a Special General Meeting of the Lowry Hill Residents Association on 3rd July after a presentation and opportunity for questions from representatives of the developers. Over 85 residents were present at the meeting.

Representatives of the Association would like to be present at the planning meeting to further explain our objections to this proposal.

We have also asked Councillor Gareth Ellis to ask for a representative of the Minerals and waste planning policy team to attend a further meeting of the Association to answer questions regarding the allocation of CA31 for a WfE facility.

On behalf of the Lowry Hill Residents Association

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[REDACTED]

---

From: [REDACTED]@evangelical-times.org>  
Sent: 11 July 2016 16:35  
To: Development Control - Planning Dept address  
Subject: objection to the application PL\1572\05 (1/16/9005)

[REDACTED] – Saved to file

Dear Sir/Madam,

I would like to raise an objection to the application **PL\1572\05 (1/16/9005)** on the following grounds:

Despite the fact that the proposed location is in an industrial estate the types of development on the estate are mainly warehousing, showrooms and office accommodation. This would be the first major combustion type of process in the estate and it is adjacent to a local nature reserve and close to a residential area with a junior and primary school.

This development includes very large structures which will have a huge impact on the outlook from the elevated areas of Lowry Hill Road and some locations around the Kingmoor Nature Reserve.

The plan is to service this incinerator with 100 HGV deliveries per day. Each of these deliveries will require the reversing of the HGV into the reception hall with accompanying reversing beeps.

I am concerned this will cause a real disturbance to the nature reserve and the residential area.

I am concerned that this type of technology (untested in the UK) will inevitably result in frequent shutdowns for maintenance or breakdown. I am concerned that at these times there will be a build up of smelly waste waiting to be incinerated (as occurred at the Dumfries EfW plant) and that this will increase flies and rodents in the area.

The development is very close (perhaps 300-400m) to the Kingmoor Nature Reserve, a highly valued area for dog walkers and family walks. I am concerned that the outlook and perceived safety concerns will affect the value of this reserve.

WRAP EfW guidelines indicate that these facilities should not be located near residential areas, school or local nature reserves.

The proposed facility is very close to Kingmoor nature reserve, Kingmoor Junior School and the Lowry Hill residential estate.

The image on the planning proposal (KNG-017cG Visuals A3.indd) gives some indication of the significant visual impact to Lowry Hill residents. This impact will be even greater at some of the entrances to and exits from the Kingmoor Nature Reserve.

I have submitted an objection on behalf of the Lowry Hill Residents Association. This is an objection in a personal capacity on behalf of my family

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