Cambridgeshire County Council

Saxon Pit

Report on behalf of the Director of Public Health

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Acknowledgements

We would like to thank all our partners who have been proactively involved and contributed to the public health work to date on Saxon Pit, following reports of concerns from residents about potential harms to human health.

This includes other members of the wider public health system, including the Animal Plant and Health Agency (APHA), Environmental Health at Fenland District Council and the UK Health Security Agency (UKHSA). We are grateful for their scientific and expert input into the public health risk assessment.

We would also like to thank the Environment Agency and the Waste Planning Authority at Cambridgeshire County Council for providing their knowledge, data and their advice and guidance on regulatory processes.

While our partners have provided us with their expert knowledge, advice, and guidance the findings and recommendations within the report are made by Cambridgeshire County Council Public Health on behalf of the Director of Public Health who has the statutory duty to protect and promote the health and wellbeing of the local population.

Scope of this work

This work initially set out to quantify any potential risks to human health from emissions to air, land, or water from the current operations at Saxon Pit. The multi-agency incident management team has, for the most part, undertaken the assessment of public health risks using available monitoring data. This was all instigated because of concerns from residents and a confirmed breach of planning conditions by East Midlands Waste Ltd. Through the work, we have identified wider system issues and so have made recommendations on these too.

We are mindful that we have not directly involved residents and operators in this first phase of our public health work. It is our aspiration that everyone is involved in collaboratively moving this work forwards.

Cambridgeshire County Council Public Health have also made separate submissions to the proposed variations to the Environmental Permit and planning permission by Johnson's. Our responses to these are in alignment with the contents of this report but address the details within the specific applications.

Summary

Details are in section 4 and appendix 2

Further to the public health risk assessment of current operations at Saxon Pit, which was informed by available monitoring data*:

- There are no identified risks to public health from:
  - water from King's Dyke being used for livestock
  - emissions from land (gas) from the site
  - air quality in the location of Hallcroft Road.
- Further evidence would be beneficial to assess:
  - air quality at the Saxon Pit boundary
  - if there are ongoing noise or odour issues
  - any cumulative health impacts, including on mental health.
- There are opportunities to strengthen ways of working across all agencies, operators, and the community to promote and enhance the health and wellbeing of residents.

*Data supplied by IMT partner agencies – details in Appendix 2

Recommendations

Details are in section 4

There are five recommendations based on the findings from the public health risk assessment and wider work for Saxon Pit. These recommendations are made on behalf of the Director of Public Health of Cambridgeshire County Council under her statutory duty to protect the health of the community.

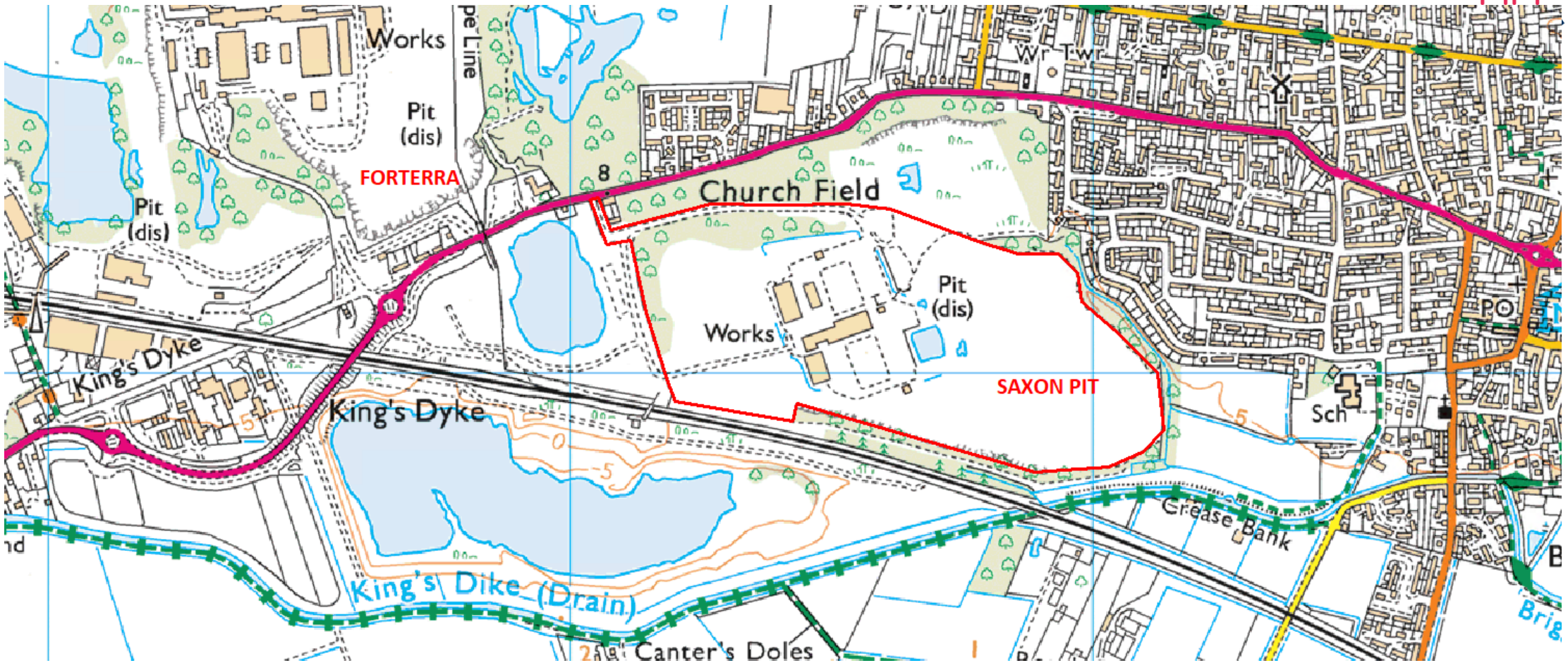
1. Increase trust and collaboration between the community, operators, and regulators.
2. Public Health at Cambridgeshire County Council to work with residents on a cumulative community health impact assessment.
3. The Environment Agency (with support from Fenland District Council) to increase monitoring to ensure risks to human health from emissions to water remain low.
4. Multi-agency partners to work together to develop an air quality monitoring strategy to understand air pollution risk and the Environment Agency to ensure regular review of dust emission management plans.
5. Public Health at Cambridgeshire County Council to explore opportunities to strengthen policies and practices around waste and human health.

Contents

Section 1: Background to Saxon Pit and its regulation

Cambridgeshire County Council

Saxon Pit and Kings Dyke, Whittlesey



Saxon Pit and surrounding area

Short history of Saxon Pit / works

- Located to the East of Peterborough, Saxon Pit in Whittlesey is a former brickworks which now has an empty space at about 22 to 25 metres below ground level. Post-brickmaking the site has been used for a wide range of commercial enterprises involving waste and non-waste related activities.
- The Pit is categorised by the Environment Agency as a site of high public interest because activities take place close to residential houses which can give rise to negative impacts on living conditions (e.g. noise, dust, and odour).
- In 2012, the Environment Agency issued a permit for 'Deposit for Recovery' operations at Saxon Pit and planning permission was granted to import inert waste and soils to stabilise the eastern pit face of the surrounding embankment.
- Between October 2017 and February 2018, non-conforming waste was deposited within the eastern buttress; a decision to leave the waste was made due to failing stabilization on the buttress walls.
- Over time, the permit transferred to different operators and the current permit holder and operator is East Midlands Waste Management Ltd. There have been several planning permissions granted to extend the time allowed to complete the stabilisation of the eastern buttress, and more recently, planning permission has been given. There is a permit application submission to National Permitting Service for the southern buttress but not allocated.
- In 2021, planning permission and a permit was issued to Johnsons Aggregates Recycling to process incinerator bottom ash. In 2024, permission was granted for metal recycling to take place.

Current operations on or near the site

There are three companies operating on or near the site that have potential to cause amenity issues. Their current operations have been considered as part of the public health risk assessment.

High level details of the Environmental Permits and planning permissions can be found in **Appendix 1**.

Johnson's have also submitted permission for variations on their Environmental Permit and planning consent as they want to substantively expand the scale of their current operations. This is not explicitly considered in this report. Public Health have provided separate responses to the Environmental Permitting and planning processes.

Johnsons Aggregate Recycling Limited deal with the treatment of Incinerator Bottom Ash (IBA)

Forterra manufacture house bricks at Kings Dyke works, the clay is supplied by adjacent quarries

East Midlands Waste Management Ltd, import waste to stabilise the pit face and have permission to recycle metal

Local regulation of operations

There are three different regulators overseeing operations at Saxon Pit, each operating under different legislation, policies, and practice, and with distinct roles.

Waste Planning Authority
Cambridgeshire County Council

- The minerals and waste planning authority (Cambridgeshire County Council) makes decisions on applications for the following types of development:
  - mineral extraction and mineral processing
  - waste disposal and recycling
- Waste development consists of facilities for waste disposal, treatment and recycling, such as landfill sites, recycling centres, incinerators and other thermal treatment of waste, composting sites, waste transfer stations and scrap yards.
- Types of planning applications | Cambridgeshire County Council

Environment Agency

- EA is responsible for protecting and improving the environment and fulfils these duties through a range of activities, including deciding whether to grant environmental permits for discharges to the water environment.
- Any persons wishing to discharge polluting substances into the environment are required to apply to the EA for an environmental permit.
- These permits will set limits on the amount of certain pollutants that can be included in the discharge to ensure impacts on the environment are considered, and that it will comply with relevant legislation.

Environmental Health
Fenland District Council

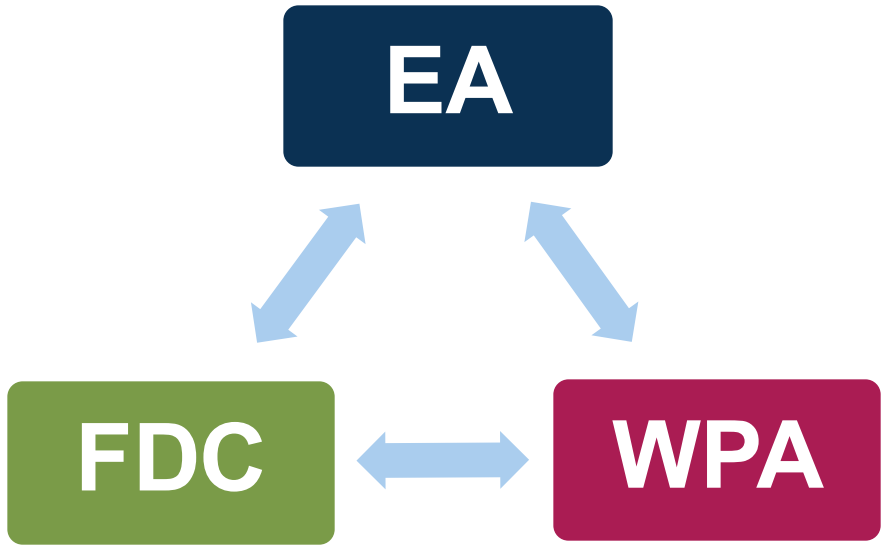
- duty to monitor Fenland for statutory nuisances such as dust and odour
- provides advice to regulators on issues that could constitute a statutory nuisance
- where there is evidence that national air quality objectives are not likely to be achieved, has responsibility to declare an Air Quality Management Area
- statutory consultees for planning and permitting
- responsibility for managing land that meets the legal definition of contaminated land (land that poses a significant risk of significant harm to the environment or sensitive receptors). Saxon Pit does not meet this definition.
- obligation to regularly review and assess air quality in Fenland and to determine whether air quality objectives are likely to be achieved. This includes an awareness of regulator permits to mitigate any risks and compliance. At Saxon Pit, the Environment Agency regulates all emissions from operators.

Regulatory control

The **Environment Agency (EA)** visit the Saxon Pit site to regulate compliance with Johnsons Aggregate Recycling Ltd, East Midlands Waste Management Ltd and Forterra which sits outside the boundary but close to the site.

The county council, as the **Waste Planning Authority (WPA)**, check compliance with the planning permissions and conditions attached to them and investigate allegations of breaches of planning control.

Fenland District Council (FDC) Environmental Health provide the WPA with advice on noise, dust, and odour issues (as well as hours of operation) and investigate whether impacts on the community constitute a statutory nuisance.



The Regulators all have different legislation that they must work under but have tried to adopt a joined-up approach, sharing information and making the best use of resources to address issues at the site.

Regulatory action (1)

The Environment Agency, Fenland District Council and the Waste Planning Authority at Cambridgeshire County Council hold frequent inter-agency meetings where they share information as regulators. They attend liaison forums with the operators and jointly convened a public meeting on 15th September 2025 to provide updates on all amenity issues. They continue to progress with investigations and the routine regulation and monitoring of the Saxon Pit site.

Waste Planning Authority

In 2024, the Waste Planning Authority at Cambridgeshire County Council served a Planning Contravention Notice (PCN) on East Midlands Waste Management Ltd. This was in respect of the wrong type of soil being brought onto the eastern buttressing which caused odour issues. In 2024, a further PCN was served to address the processing of waste metal before planning permission was in force. The result of the service of the PCNs was that both issues were resolved.

Environmental Health

Continues to investigate reports of noise, dust, and odour from the site as these environmental issues may impact residents. Since 2021, 152 cases have been raised and investigated following procedure. These reports are of potential nuisances emanating from the site.

Regulatory Action (2)

Environment Agency

- Johnsons Aggregate Recycling Limited has been visited five times in 2025 and East Midlands Waste Management has had fourteen regulatory visits from the EA.
- Johnsons Aggregate Recycling Limited has been scored for non-compliance on amenity complaints (noise).
- Johnsons Aggregate Recycling Limited has also been given advice and guidance for one third party lorry moving between their site boundary uncovered, to East Midlands Waste Management Limited.
- East Midlands Waste Management has had three reports for advice and guidance, a notice of a suspension Regulation 37 (accepting deposit, treat and or dispose of any non-permitted waste) on the Eastern Buttress Capping Layer, and scored for unauthorised waste (Trommel Fines) used for remediation work on the Eastern Buttress.
- The EA scores sites for compliance from A to F. Saxon Pit (as a site) is currently scored a B which means that they have demonstrated an expected level of permit compliance. More details on scoring are in Appendix 1.

Section 2: Key issues and complaints from the community

This section provides a snapshot of key issues for the community and of complaints/complainants about Saxon Pit to regulators. It is important to note, that these views/complaints have not been gathered systematically and that the definition of a “complaint” and the way that is captured and processed varies by regulator. Not all these complaints have been substantiated.

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Key issues for the community

- Noise, dust, and odour
- Use and status of incinerator bottom ash (IBA) and IBA aggregate (IBAA)
- HGV traffic through Whittlesey
- Discharge of water into Kings Dyke
- Cumulative impacts
- Non-conforming waste in Eastern Buttress
- Lack of trust in regulators
- Operator performance and non-compliance

Complaints

- All the regulators have received complaints about the Saxon Pit site and are aware of the significant public concern about the impact of the waste operations on health and wellbeing.
- Complaints are dealt with differently by the different regulators, how they are recorded and categorised varies and so the numbers are not comparable.
- Environmental Health (at FDC) - since 2021, 152 cases have been raised and investigated following procedure.
- Waste Planning Authority (at CCC) – recorded 7 (evidenced) complaints about the site in the last two years, noting that some of the correspondence submitted in relation to planning applications raised concerns.
- Environment Agency – records reported incidents of environmental pollution – details are included on the next page.

National Incident Reporting System (NIRS)

- The Environment Agency receive reports via the National Incident Office and the Online Reporting Tool from the public. The Hotline Number is 0800 80 70 60. These incidents are then reviewed by a duty officer.
- Each report is reviewed and categorised by severity. Area officers will attend an incident if deemed appropriate and take compliance action.
- Between January to December 2025 there were 243 reports of incidents. Highest report was noise, where dust was the lowest at 17 reports. In 2024, dust was 30, noise 31 and odour 215.
- Three reports have been substantiated and attributed to the permitted activities within Saxon Pit. Where this has been the case, the Environment Agency has acted against the permitting regulation.
- Recent National Incident Recording has suggested that there is an increase in noise related reports. Both Fenland District Council (Environmental Health) and Environment Agency officers are currently investigating.

Section 3: Public Health system and Incident Management Response

Cambridgeshire County Council

Roles within the Public Health system

In environmental hazards, waste and human health

UK Health Security Agency

- Provide expert technical public health advice on pollutants (air, land and water) and potential harm to human health to Environment Agency and Director of Public Health (DPH) (at CCC) via environmental permitting process
- Provide expert technical advice into incidents involving environmental hazards through an incident management response

Public Health

Cambridgeshire County Council

- Consultee for environmental permits, providing any local context of health needs where it may be relevant to the assessment of the impact on human health
  - identify any existing local health issues that may be associated with the regulated facility or its location
  - if required, discuss with the local community any concerns they may have on any potential health risks associated with a regulated facility
- Consultee for planning applications via the Strategic Waste Authority, providing input on wider public health issues
- Strategic work on “health in all policies” which includes working with planners to ensure that policies give due regard to health

Environmental Health

Fenland District Council

- Plays a practical role in the public health system focusing on how the environment affects human health through impacts to land and air quality.
- Consultee for environmental permits and planning applications (both county council and district council).
- Key role in identifying and assessing risk in the environment.
- Providing input and comment on environmental protection aspects of new planning applications or variations.
- This will also include consideration of any health-related impacts on people and communities, including issues of potential statutory nuisance.

Animal and Plant Health Agency

- Work to safeguard animal and plant health for the benefit of people, the environment and the economy.
- Provide expert advice on pollutants entering the food chain and their impact on livestock and crops

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Incident management response

- In July 2025, Environmental Health Officers raised concerns from the community with Public Health at Cambridgeshire County Council about potential negative health impacts from Saxon Pit.
- Having spoken to Environmental Health and the Waste Planning Authority, Public Health requested UKHSA expert support in assessing whether there were any public health risks using available monitoring data.
- Public Health convened an Incident Management Team including UKHSA, Environmental Health at FDC, and from October, APHA. As regulators, the Environment Agency and the Waste Planning Authority at CCC were also invited in an advisory capacity to provide data and guidance on the site, its history, and regulation.
- The IMT has run from July 2025 to January 2026 and has 10 meetings.
- The findings from the IMT are set out in **Appendix 2** and feed into the recommendations made in this report.

Section 4: Summary of findings and recommendations

Cambridgeshire County Council

Detailed summary of findings

From wider observations:

- There is clear feedback from residents that their health and wellbeing is being impacted through noise, odour and dust. Some are specifically worried about the processing of incinerator bottom ash (IBA) which they consider to be hazardous.
- The regulation of the site's multiple operations and their impact on the health of residents is complicated. The regulatory system is not always joined up (by design and implementation); is not set up to enable the best assessment of potential harms to health (vs. theoretical models commissioned by site operators for environmental permit / planning applications) and does not instil public confidence when there are problems. Cumulative impacts on health and wellbeing need to be better understood and assessed in standard processes. The community has a lack of agency in this all.

From the assessment of the available monitoring data:

- Environment Agency monitors have recorded dust at the Saxon Pit boundary but the source is unclear.
- Fenland District Council's non-statutory air quality monitor at Hallcroft Road consistently shows air quality in that area is rated as good (in accordance with air quality indices), with no exceedances of air quality standards recorded. Despite two periods of mechanical downtime (Feb-May 2024 and Jan-May 2025) since 2023, the data set is extensive.
- Dust levels are being monitored within the Saxon Pit site by operators under Environment Agency permit requirements.
- Air quality is not being monitored on the site boundary therefore no public health assumptions can be drawn.
- Levels of heavy metals in the King's Dyke exceed drinking water standards. The water is used for livestock but there are no standards for this, so additional soil sampling was undertaken to assess the risk to human health via livestock. This shows no cause for concern.
- There are no identified risks to the health of Whittlesey residents from gas being emitted from the ground in Saxon Pit.

1. Increase trust and collaboration between the community, operators, and regulators

The regulatory framework around the multiple operations at Saxon Pit is complicated and it is difficult to disentangle which processes in Saxon Pit (and beyond) that are resulting in concern for residents. Residents appear to be deeply frustrated with processes and the non-political resident group (SaxonGate) are sending in very detailed correspondence. This is not always going to the right part of the system and is causing some officers to be overwhelmed with information which is not always relevant to their span of control.

Historically there have been liaison forums and also an annual all regulator meeting with residents. Operators meet separately with regulators because relationships with residents have broken down over the years.

To address some of the health and wellbeing impacts that residents are reporting that they have been experiencing, there needs to be work to build trust and better collaboration between all agencies, operators, and the community moving forward.

Actions

- Regulators (Environment Agency, Waste Planning Authority at Cambridgeshire County Council and Environmental Health at Fenland District Council) will start a set of quarterly meetings with residents to provide updates to residents and address any ongoing concerns on regulatory issues. A terms of reference will be developed for this group.
- The Environment Agency's Engagement HQ digital platform is being refreshed and will shortly be available to the public. This will be where regular updates from the agency are published.
- Public Health will establish a system-wide group that includes local authorities, Environment Agency, community representatives, and operators to continue work on public health impacts. This group would oversee the implementation of other recommendations from this work. Regulators would be there in an advisory capacity.

2. Public Health at Cambridgeshire County Council to work with residents on a cumulative community health impact assessment

To date, this work has been undertaken by officers from several agencies and there has not been direct community engagement on the public health risk assessment, although community complaints and feedback into recent regulatory processes have been reviewed. There is now a need to proactively engage with the community on the findings of this assessment and future work involving public health who have a role in advocating for the community's health.

More evidence is required to fully assess the impact of operations at Saxon Pit, including the cumulative impact, on the community of Whittlesey.

A cumulative community health impact assessment would include an assessment of impacts on both physical and mental health and wellbeing of all, including vulnerable groups.

Actions

- With agreement and in collaboration with the community, Public Health at Cambridgeshire County Council to undertake a cumulative community health impact assessment to systematically gather impacts on health and wellbeing, and in particular, to look at cumulative impacts.

3. The Environment Agency (with support from Fenland District Council) to increase monitoring to ensure risks to human health from emissions to water remain low

There was evidence from water quality testing that the levels of heavy metals in King's Dyke exceed drinking water standards. While we do not expect anyone to be drinking from King's Dyke (and there are no known private water abstractions for human consumption), there was a public health concern about the potential build-up of heavy metals in soil and animals (particularly eggs) as water from the Dyke is being used for livestock. However, additional soil sampling for lead and cadmium shows no cause for concern for human health. An environmental survey by the Environment Agency also shows the expected level of invertebrates in King's Dyke.

To date, the lagoon discharge into King's Dyke has not been permitted. As the discharge water quality reports from the operator were only taken from the lagoon as a requirement from National Permitting Service, the Environment Agency have been sampling the lagoon and both "upstream" and "downstream" of the proposed discharge point (as the water does not drain naturally). The Environment Agency's National Permitting Service (NPS) has received all data from the samples and consider that the discharge permit the operator has applied for is appropriate. The National Permitting Service is finalising the permit conditions and it will be released for consent shortly. This will mean that water quality is routinely monitored and regulated at the discharge point. Given that some of the sampling undertaken for the public health risk assessment was in the autumn months when water levels are higher, we are keen from a public health perspective that there is some monitoring at abstraction sites in the summer to provide further reassurance.

Actions

- East Midlands Waste and the Environment Agency will be responsible for water sampling on a routine basis through the permit conditions. Reports of sampling data will be publicised through Engagement HQ digital platform and on request.
- Environmental Health at Fenland District Council to consider options for monitoring of King's Dyke at water abstraction points for livestock when ground water is low (i.e. summer) to ensure that risks to human health are still low and will review use as part of private water supply / abstraction assessments.

4. Multi-agency partners to work together to develop an air quality monitoring strategy to understand air pollution risk and the Environment Agency to ensure regular review of dust emission management plans

More data is needed to assess air quality at the boundary of Saxon Pit. Air quality is being monitored within the Saxon Pit site by operators under Environment Agency permit requirements. It is not being monitored on the site boundary therefore no public health assumptions can be drawn about air quality on the boundary.

The Environment Agency has recorded dust at the boundary and there are complaints from residents about dust.

To determine whether air quality is up to standard at the site boundary, particulate matter (dust) monitoring should be done there. This is not expected, initially, to conclude the source of any dust.

Saxon Pit operators must provide evidence of mitigation of dust through their Dust Emission Management Plans that are reviewed by the Environment Agency, so there are regular opportunities to review and strengthen these as necessary.

Actions

- Multi-agency partners to develop an air quality monitoring strategy for Saxon Pit in consultation with residents and operators and with specialist support from UKHSA. A Mobile Monitoring Facility has been applied for through the Environment Agency that will evidence dust direction and volume. This will be implemented in spring/summer 2026.
- The regulators should consistently check compliance with the operators. Approved dust emission management plans are reviewed on every visit, the Environment Agency should proactively consider whether the latest Best Available Technique (BAT) are being used (e.g. for East Midlands Waste review in November 2025, mandated for their permit application). Dust modelling should be considered by the permitting team.

5. Public Health at Cambridgeshire County Council to explore opportunities to strengthen policies and practices around waste and human health

The work has highlighted several opportunities to consider strengthening a "health in all policies approach" in waste and has highlighted the need to understand whether there are other communities in Cambridgeshire who are facing similar issues as Whittlesey, including from cumulative impacts. Additionally, there is very limited public health research undertaken on the impact of waste facilities on communities and far less discussion about this on public health forums compared to housing developments, for example, or within growing discourse around the commercial determinants of health.

Actions

- Consider whether there are other waste sites in Cambridgeshire where there needs to be a greater response from public health due to single issues or cumulative health impacts from multiple operations.
- Review opportunities to strengthen risks to human health, including mental health, in the strategic waste plan and waste enforcement policies as they are updated in 2027 and in Fenland District Council's emerging Local Plan.
- Through public health networks, reach out to other public health and environmental health teams in areas where there have been concerns about public health risks around waste sites and share learning.
- Discuss with public health academics and NIHR as to whether there is merit in exploring some of the questions that have been raised through this process through public health research programmes, noting that there is a lack of public health research into waste planning (vs. planning for housing), there are commercial determinants of health, and waste sites are usually placed in areas of relatively higher deprivation resulting in a potential widening of health inequalities.

Appendix 1: Permissions for operations at Saxon Pit

This section provides high level details on the Environmental Permits and Planning Permissions for operations at Saxon Pit

Cambridgeshire County Council

Environmental permits on site: Johnsons Aggregates & Recycling Ltd

Environmental permits and applications that relate to the existing and proposed waste management operations

EPR/DP3131NM – Original Permit

- Issued to Johnsons Aggregates and Recycling Limited allowing treatment of Incinerator Bottom Ash (IBA) to produce aggregate and limited construction and demolition (C&D) waste processing. Operations include metal recovery, screening, and storage, with strict dust, noise, and water management measures. The facility can handle up to 250,000 tonnes of IBA and 50,000 tonnes of C&D waste annually. Conditions cover environmental monitoring, reporting, and compliance with ISO 14001 standards. Authorised on 14 January 2022.

EPR/DP3131NM/V003 – Variation Notice

- Issued to Johnsons Aggregates and Recycling Limited for Saxon Brickworks, Whittlesey. This variation adds standard rule set SR2024 No.1 for research and development at the Saxon Brickworks site. It permits time-limited R&D activities alongside existing IBA and C&D waste treatment operations. The notice confirms compliance with environmental protection standards and updates the permit's status log. Effective from 11 August 2025.

Environmental permits on site: East Midlands Waste Management Ltd

Environmental permits and applications that relate to the existing and proposed waste management operations

EPR/WE8050AC – Standard Rules Permit

- Authorises East Midlands Waste Management Limited to operate waste activities under standard rules, including metal recycling and associated waste operations. Authorised on 11 April 2025.

Standard rules SR2015 No14 – Metal recycling site

- The standard rules authorises operation of a metal recycling site for sorting, shredding, baling, compacting, crushing, and cutting ferrous and non-ferrous metals for recovery. Activities must not occur within 500m of European or Ramsar sites, SSSIs, or within 50m of water sources for human consumption. Annual waste intake is limited to 75,000 tonnes, with hazardous waste capped at 50 tonnes. Burning waste and point-source emissions to water or groundwater are prohibited. Operations require impermeable surfaces, sealed drainage, and compliance with fire prevention and management plans. Emissions, odour, noise, and vibration must not cause pollution, and strict reporting and record-keeping apply

Permit number – CP3723LU – Awaiting allocation for application on Southern Buttress works

Permit number – YB3895AC – Awaiting a decision on Discharge Consent from the Lagoon to Kings Dyke

This report does not relieve the site operator of the responsibility to

- ensure you comply with the conditions of the permit at all times and prevent pollution of the environment
- ensure you comply with other legislative provisions which may apply.

Non-compliance scores and categories

CCS category	Description	Score
C1	A non-compliance which could have a **major** environmental effect	60
C2	A non-compliance which could have a **significant** environmental effect	31
C3	A non-compliance which could have a **minor** environmental effect	4
C4	A non-compliance which has **no** potential environmental effect	0.1

Operational Risk Appraisal **(Opra)** - Compliance assessment findings may affect your Opra score and/or your charges. This score influences the resource we use to assess permit compliance.

MSA, MSB & TCM are conditions inserted into certain permits by Schedule 9 Part 3 EPR

MSA requires operators to manage and operate in accordance with a written management system that identifies and minimises risks of pollution.

MSB requires that the management system must be reviewed, kept up-to-date and a written record kept of this.

TCM requires the submission of technical competence information.

EA Scoring

When the EA find a Non-Compliance

- The subsistence charge (which is meant to cover the EA's costs of regulating a permitted activity) is calculated by applying a percentage multiplier to the baseline subsistence charge, based upon the compliance band for the previous year.
- At the end of the compliance year, the scores for non-compliance are added together to generate a compliance band:
- A = 0 points
- B = 0.1 to 10 points
- C = 10.1 to 30 points
- D = 30.1 to 60 points
- E = 60.1 to 149.9 points
- F more than 150 points
- Sites in compliance bands A and B have demonstrated an expected level of permit compliance.
- Sites in compliance bands C and D must improve in order to achieve permit compliance.
- Sites in compliance bands E and F must significantly improve in order to achieve permit compliance. These sites are more likely to have their permit revoked unless there is substantial evidence that they are working towards achieving compliance in a timely manner.

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Planning permissions on site: Johnsons Aggregates & Recycling Ltd

Planning permissions and applications that relate to the existing and proposed waste management operations

CCC/21/024/FUL

- Importation, storage, processing including use of trommel, picking and recycling of incinerator bottom ash (IBA) and construction and demolition (C&D) waste, for exportation for use as incinerator bottom ash secondary aggregates (IBAA)
- Granted 22 April 2022

CCC/23/044/FUL

- A lean-to extension to Johnsons Aggregate and Recycling existing main recycling building to house the operational trommel
- Granted 14 September 2023 but not implemented yet

CCC/24/091/VAR

- Importation, storage, processing including use of trommel, picking and recycling of incinerator bottom ash (IBA) and construction and demolition (C&D) waste, for exportation for use as incinerator bottom ash secondary aggregates (IBAA). Informative: S73 planning application to vary conditions 5 (Approved plans & documents); 6 (Hours of operation); 15 (Vehicle movements); 21 (Annual throughput of waste); and 25 (Stockpile heights) of planning permission CCC/21/024/FUL to increase: the quantity of waste imported to the site, number of HGV movements, stockpile heights and hours of operation within building 1; make changes to the layout of plant; and to crush and screen IBA/IBAA and C&D waste
- Submitted 30 August 2024 – under consideration

Planning permissions on site: East Midlands Waste Management Ltd

Planning permissions and applications that relate to the existing and proposed waste management operations

CCC/24/048/FUL

- Metal Recycling Facility for the storage, sorting, separation, grading, sheering, baling, compacting, crushing, granulating and cutting of ferrous metals or alloys and non-ferrous metals
- Granted 17 February 2025 but not implemented; pre-commencement conditions being discharged (CCC/25/079/DCON conditions 10, 14, 16, & 18 approved 7 November 2025; CCC/25/127/DCON condition 15, approved 2 January 2026)

CCC/25/006/VAR [buttressing the eastern pit face]

- Importation of controlled inert wastes for the buttressing, stabilisation and restoration of a former mineral extraction face together with an associated waste reception area
  Informative: Section 73 planning application to vary conditions 5 & 6 (Temporary Duration of Permission) of planning permission CCC/22/092/VAR to amend the timescale for restoration
- Granted 28 May 2025

CCC/24/078/FUL

- Importation of controlled inert construction and demolition wastes for the buttressing and stabilisation of the southern face of a former mineral excavation face with associated screening, stockpile and storage areas. Granted 10 March 2025
- Application to discharge conditions 10 (Access road improvements); 14 (HCV routing agreement); 15 (Wheel cleaning); 19 (Noise management, monitoring & mitigation scheme); 21 (Dust management, monitoring & mitigation scheme); 26 (Restoration); 28 (Construction Ecological Management Plan); and mandatory biodiversity gain condition, under consideration

Appendix 2: Report from the Incident Management Team

This section outlines the findings from the analysis by scientists at UKHSA and APHA using data from monitoring from Saxon Pit operators or collected by the Environment Agency or Fenland District Council. For the most part, this was routinely available data, but some water and soil samples were specifically collected for the assessment.

Cambridgeshire County Council

Saxon Pit Incident Management Team: public health risk assessment

Incident Management Team – 18 December 2025

UKHSA ref: CIRIS 93172 / CIMS 200761882

Overview of slides for IMT

1. Incident Management Team: roles and responsibilities
2. Site map (including sensitive receptors)
3. Data sources
4. Methods of analysis
5. Findings
6. Public health risk assessment: potential next steps for IMT consideration

Incident Management Team: roles and responsibilities

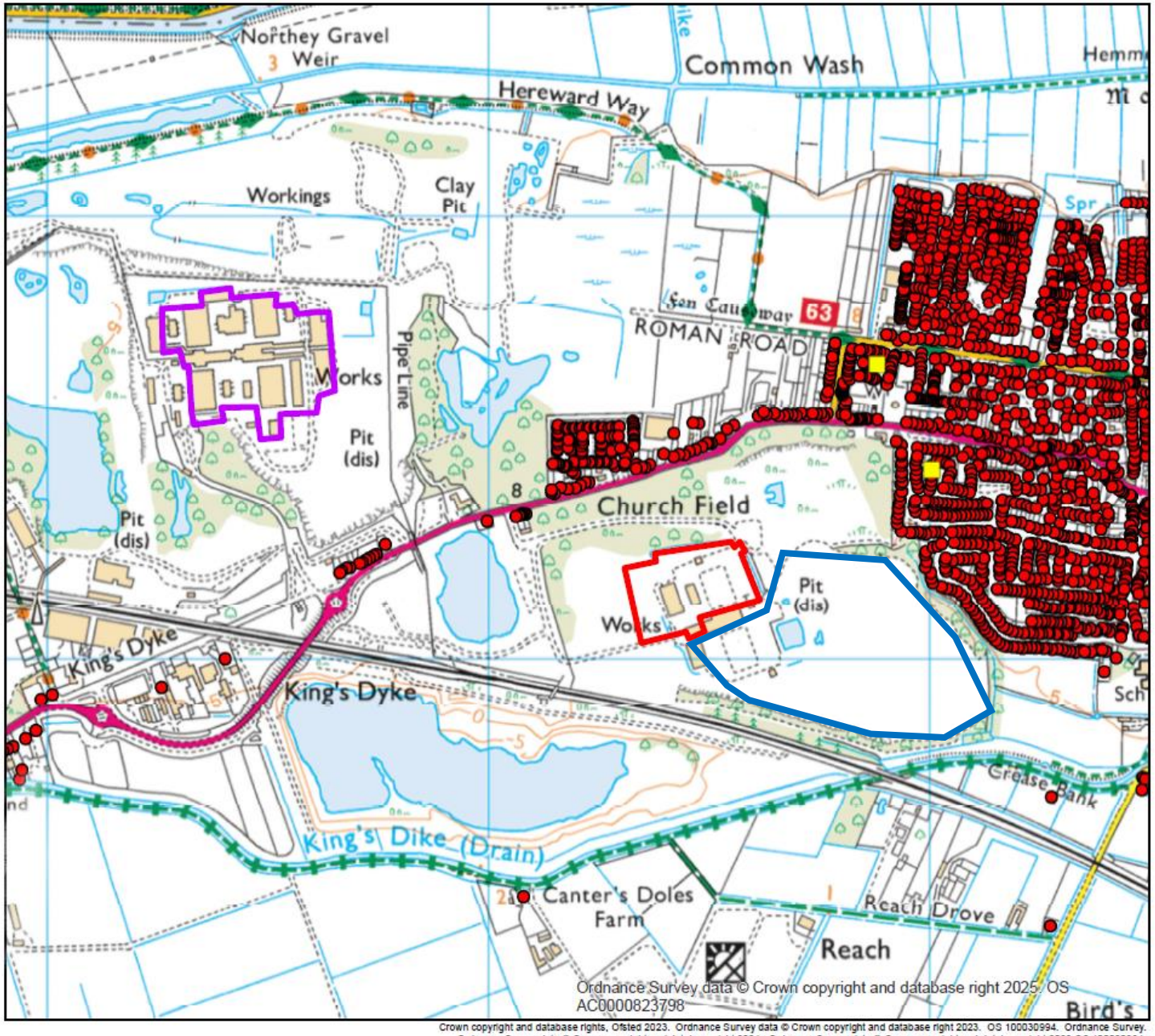
- Roles and responsibilities (including statutory responsibilities) of multi-agency partners in relation to health protection incident management are detailed in national guidance (link below)
- Although developed with a focus on communicable disease outbreak management, the principles of incident management apply equally to non-communicable disease and environmental public health incidents
- National guidance and toolkits to support Incident Management Teams are available here:
- https://www.gov.uk/government/publications/communicable-disease-outbreak-management-guidance

Saxon Pit Sensitive Receptors Map (CIRIS 93172)

UK Health Security Agency

Receptors

- Forterra Brickworks
- Johnsons Aggregates and Recycling Limited
- Nursery / Early Years
- Residential Population APs GB (Web Service)
- East Midlands Waste Management



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1:12,500

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UK HSA
10 South Colonnade
London
E14 5EA

Data sources

Operator / IMT member	Data provided to UKHSA
Fenland District Council	• Ambient air monitoring data for PM_{10}, $PM_{2.5}$ and NO_2 at the Hallcroft Road site Jun 25 (data taken directly from webpage) • Summary of dust and odour complaints Sep 23-Jul 25 • Local information on where abstractions from the Kings Dyke are being undertaken and what the water is being used for
Forterra Brickworks	• Ambient air quality monitoring data for SO_2 at 2 sites Jan- Aug 25* • Extractive stack emissions testing (2011-2024) (via EA contact for Forterra) • Review of the air quality management plan 2021 (via EA contact for Forterra) • Site permit granted 2006 (via EA contact for Forterra) • Water sampling data Jan-Dec 24 (via EA contact for Forterra) • Particle size distribution data from 2021, 2024 and 2025 (via EA contact for Forterra)
Johnsons Aggregate Recycling Ltd *	• Incinerator Bottom Ash (IBA) analysis Jan-Mar 2025 and Incinerator Bottom Ash Aggregate (IBAA) product analysis Feb 25 • Deposit gauge (frisbee type** – on site) data April-June 25 • Particulate monitoring data Jul 24-Jun25 • Site permit and variation Sep 24
East Midlands Waste Management Limited*	• Surface and groundwater monitoring analysis - Jun 24 all boreholes and surface water, Dec 24 lagoon only, Jun 25 lagoon and lagoon feeding pipes • Ground gas monitoring results June 24- June 25 • Air quality monitoring data for May 23-Jun 24, and Jan 25 to Aug 25
The Environment Agency (EA)*	• Upstream, discharge point (from lagoon) and downstream monitoring of surface water and sediment analysis Kings Dyke Jan 25 • Deposit gauge (frisbee type – off site) data Jun 25 • Odour reports and complaints data Jan-July 25

*Data provided through EA discretional disclosure; **a monitoring device used to determine air particles.

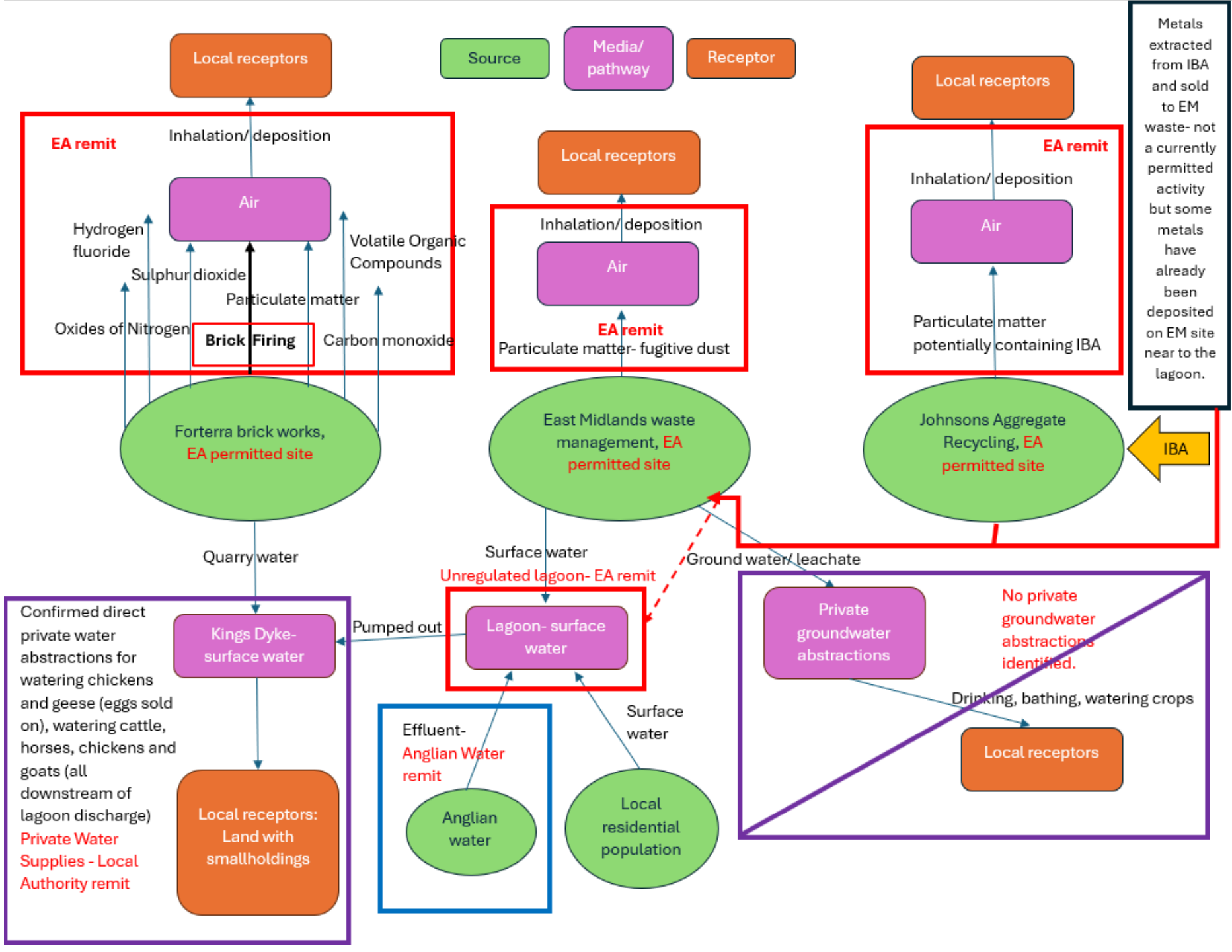
Methods of analysis

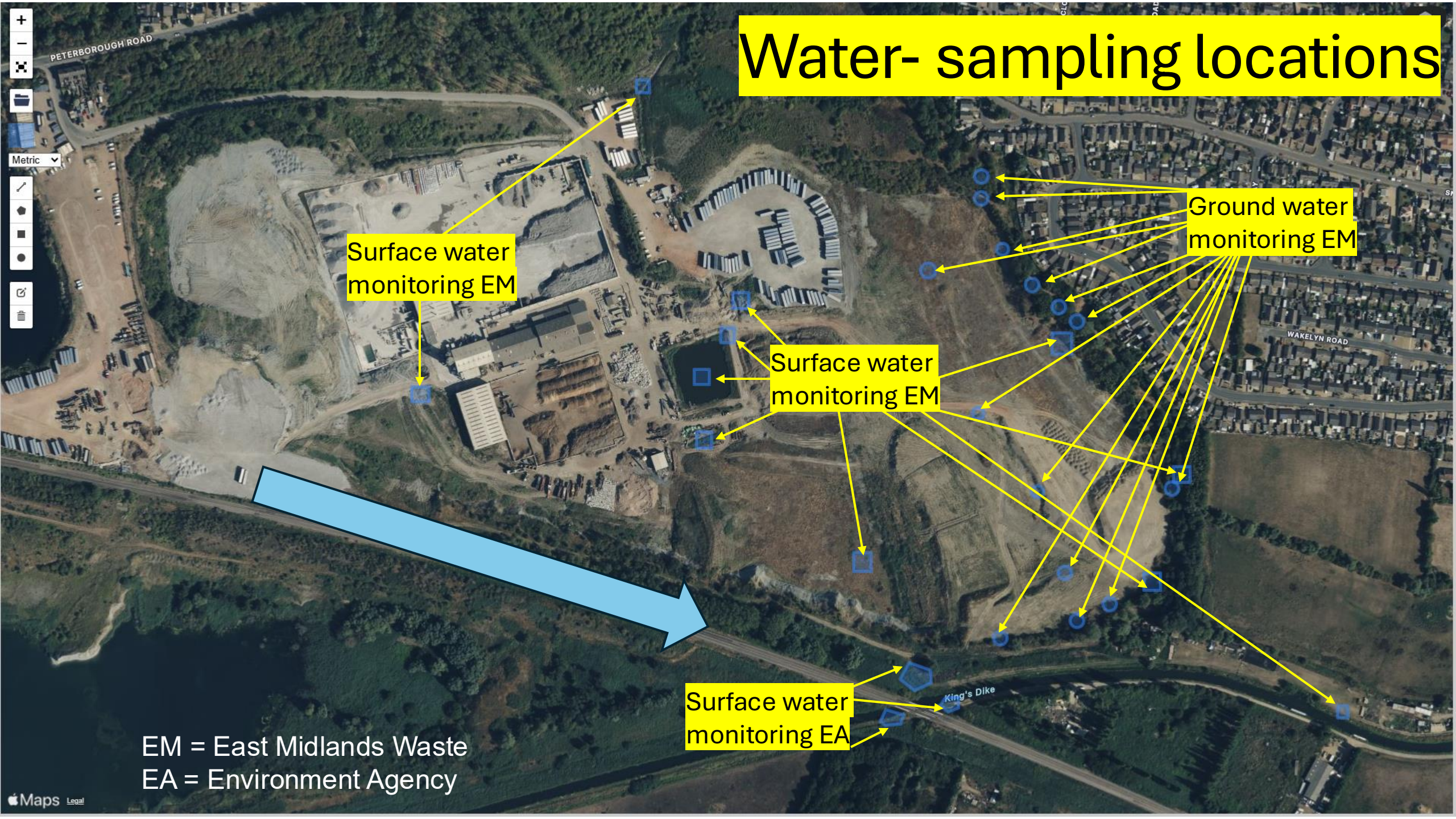
- Data was collated from IMT partner agencies (data sources are detailed in slide 5)
- Data and information relevant to the public health risk assessment was identified (from the suite of data received from partners)
- The source-pathway-receptor model was applied to identify whether emissions and pollution from site had potential to reach sensitive receptors
- A conceptual site model was developed to illustrate potential source, pathway and receptor linkages
- Available data was compared against relevant health-based standards to identify potential public health risks and gaps in evidence

Findings: overview

1. Overview of sources, pathways, and receptors (conceptual site model)
2. Water
3. Air quality
   - Sulphur dioxide
   - Particulate matter (on-site/off-site)
4. Land
5. Odour

Conceptual site model:




Water- sampling locations
Surface water monitoring EM
Surface water monitoring EM
Ground water monitoring EM
Surface water monitoring EA
EM = East Midlands Waste
EA = Environment Agency
PETERBOROUGH ROAD
WAKELYN ROAD
King's Dike
Metric
Maps

Water

- Surface water sediment and surface water: data provided for the period Jan 25 (EA), Sep 19-Jun 25 summary, Jan-Dec 24 for detailed analytical results (EM waste)
  - Lagoon: The lagoon on site is currently a non-regulated discharge
    - There are elevated concentrations of certain elements in the lagoon which, if compared with drinking water standards, would exceed them. The lagoon is likely to also contain effluent due to its use by Anglian Water. Water drains into the lagoon from the local residential area and from the wider Saxon pit, including the waste deposit for recovery areas.
  - Kings Dyke
    - There are also elevated concentrations of certain elements in the Kings Dyke which, if compared with drinking water standards, would exceed them
  - Water abstractions
    - For any individuals abstracting water downstream of the lagoon (e.g., at Kings Dyke), there was a potential risk identified to public health from ingestion of animal products (e.g. eggs/ meat), or irrigated plants. These aspects of the public health risk assessment have been taken forward by the Animal and Plant Health Agency (APHA) and Fenland DC environmental health – see results on soil sampling.
- Ground water
  - At present, no evidence of groundwater abstractions has been identified, therefore at present we do not consider that this pathway poses a risk to public health

Note: It is not within UKHSA's remit to conduct source apportionment modelling studies that would enable linkage of pollution to individual operators

Soil sampling rationale

- It was established that water from the Kings Dyke had been used to provide drinking water for a small number of local livestock holdings. It was confirmed that water is not being used for crop irrigation.

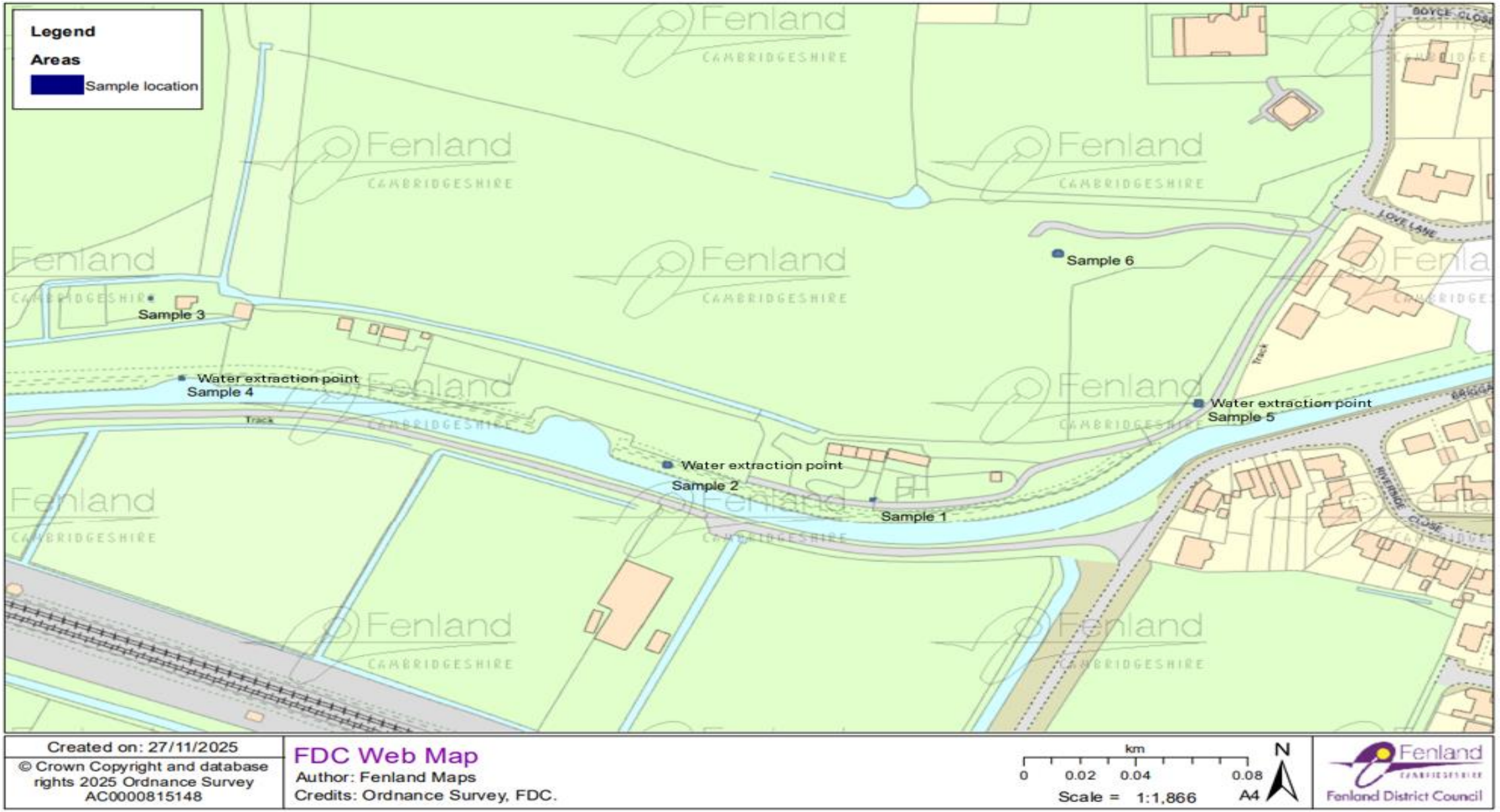
- Based on the water analysis results and ecology study findings, the Veterinary Lead for Toxicology for the Animal and Plant Health Agency proposed additional soil sample analysis for comprehensive assessment. APHA work with Food Standards Agency in identifying hazards and controlling potential food safety chain risks.

- It was decided to test for cadmium and lead as these are common metal pollutants and useful biomarkers to assess if further analysis of agricultural products (animal or arable) was required.

- There had been no reported history of disease or poor production which could be attributed to subclinical exposure to metal pollutants.

- As a precautionary measure small scale egg producers who housed birds on the site were advised by environmental health officers on 24th October to cease any sale and consumption of eggs. Once sampling results were available and analysed this advice was rescinded on 10th December.

Soil sampling – mapped locations



Location and sample details

Sample Location and depth	Land use	Date /Time	Comments
Sample 1 – 10 cm TL 26380 96729 52.55376, -0.13738	Cow pen / Water trough	13/11/25 9:40am	Sample prevalent with earth worms/vegetation. Weather dry, sunny.
Sample 2 – 10 cm TL26364 96724 52.55372, -0.13761	Water pump / extraction point	13/11/25 – 9:52am	Ground was compacted; stones present. Weather dry and sunny.
Sample 3 – 10 cm TL 26113 96822 52.55466, -0.14128	Geese pen drinking dispenser	13/11/25 10:11am	Ground full of leaves and grit. Weather dry and sunny
Sample 4 – 10cm TL 26115 96787 52.55434, -0.14126	Water extraction for geese pen	13/11/25 – 10:20am	Ground full of roots and leaf litter. Weather dry and sunny.
Sample 5 – 10 cm TL 26472 96764 52.55405, -0.13601	Water extraction point horses and chickens	13/11/25 10:55am	Soil compacted and full with leaf litter and stones. Weather dry and sunny.
Sample 6 – 10 cm TL 26402 96833 52.55469, -0.13702	Water trough and storage tank	13/11/25 11:06am	Soil very wet, vegetation removed. Weather dry and sunny.

Sampling results and findings

Sample site	Lead level Mg/Kg	Acceptable level* Mg/Kg	Cadmium level Mg/Kg	Acceptable level* Mg/Kg
1	30.5	200	0.171	10
2	58.1	200	0.242	10
3	35.5	200	0.308	10
4	35	200	0.429	10
5	100	200	0.208	10
6	30.7	200	0.220	10

* Acceptable level when compared to standards for soils used for food production.

Guidance

- The purpose of the soil analysis was to assess for contaminants (metal pollutants) which could impact the health of animals such as chickens and livestock.

- Based on the analysis conducted, there are no concerns currently.

- Egg producers were advised they may now consume / sell their eggs again following receipt of these results.

- The sediment analysis has identified metal pollutants. In periods when the volume or flow rate of the Kings Dyke may be reduced, it would be pertinent to assess water quality if used for livestock.

Emissions to Air- monitoring locations

Forterra SO_2 monitor

Johnsons deposition PM monitors (frisbees)

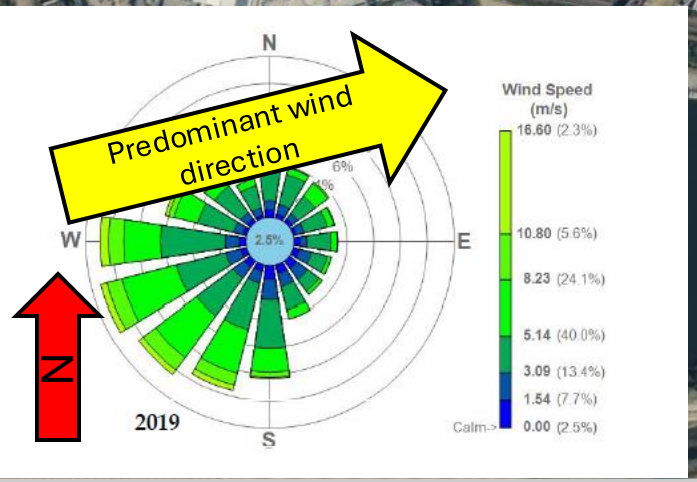
EA deposition PM monitor (frisbee)

Real time monitor (Fenland LA)

Johnsons real time PM monitors

EM waste real time PM monitor

Forterra SO_2 monitor



Air Quality: sulphur dioxide

Forterra sulphur dioxide (SO_2) ambient air monitoring data provided for the period Jan-Aug 25

- There is an air quality management area (AQMA) in place for Whittlesey due to the SO_2 emissions from the Forterra brickworks
- Operator (Forterra) monitoring of SO2 at Bradley Fen shows air quality objectives (AQO) are not being exceeded. There were 5 exceedances of the 15-minute SO_2 air quality objective (AQO) as set out in the air quality strategy for England (4 in March and 1 in July)
  - Air quality objective (AQO) SO_2 15 minute is 266 µg/m^3 not to be exceeded more than 35 times a year

https://uk-air.defra.gov.uk/air-pollution/uk-limits

Air Quality: particulate matter on site

Forterra (data provided 2011-2024)

- Particulate matter is emitted from the Forterra brickworks as a point source emission
- Forterra extractive stack emission data indicated that there were 6 occasions on which concentrations of particulate matter were measured as being higher than the Emission Limit Values specified in the extant environmental permit. No breach of permit conditions for Forterra was reported to UKHSA as part of the IMT.
- The Environment Agency provided the following statement to aid interpretation of this result: *"These emission limit values are based on an average hourly Kilogram per hour limit, which whilst it allows for the highly variable nature of the emissions, necessarily includes a 42.4% uncertainty factor built into its calculation."*
- The IMT notes that extractive testing is a spot check while Emission Limit Values are calculated as "*the annual mean of 1 hour average(s)*". No breach of permit conditions for Forterra was reported to UKHSA as part of the IMT.
- Extractive stack emission data was provided as percentages of particulate matter including $PM_{2.5}$/ PM_{10}. As air quality standards are reported as ug/m3, it is not possible to compare these percentages to air quality standards
- As the extractive monitoring is conducted on site, workplace exposure limits would be in effect for occupational exposures, as opposed to air quality standards or objectives
- Note: occupational health risk assessments are not in UKHSA's remit. The Health and Safety Executive are responsible for this.

East Midlands Waste Management (data provided from May 23-Jun 24, and Jan 25 to Aug 25)

- Fugitive dust emissions[1] are produced by East Midlands Waste Management
- East Midlands Waste have a continuous air quality monitor located on site
- As the monitor is located within the boundary of Saxon Pit, workplace exposure limits would be in effect for occupational exposures, as opposed to air quality standards or objectives
- Note: occupational health risk assessments are not in UKHSA's remit

Johnsons Aggregate Recycling Ltd (data provided from Apr-Jun 25)

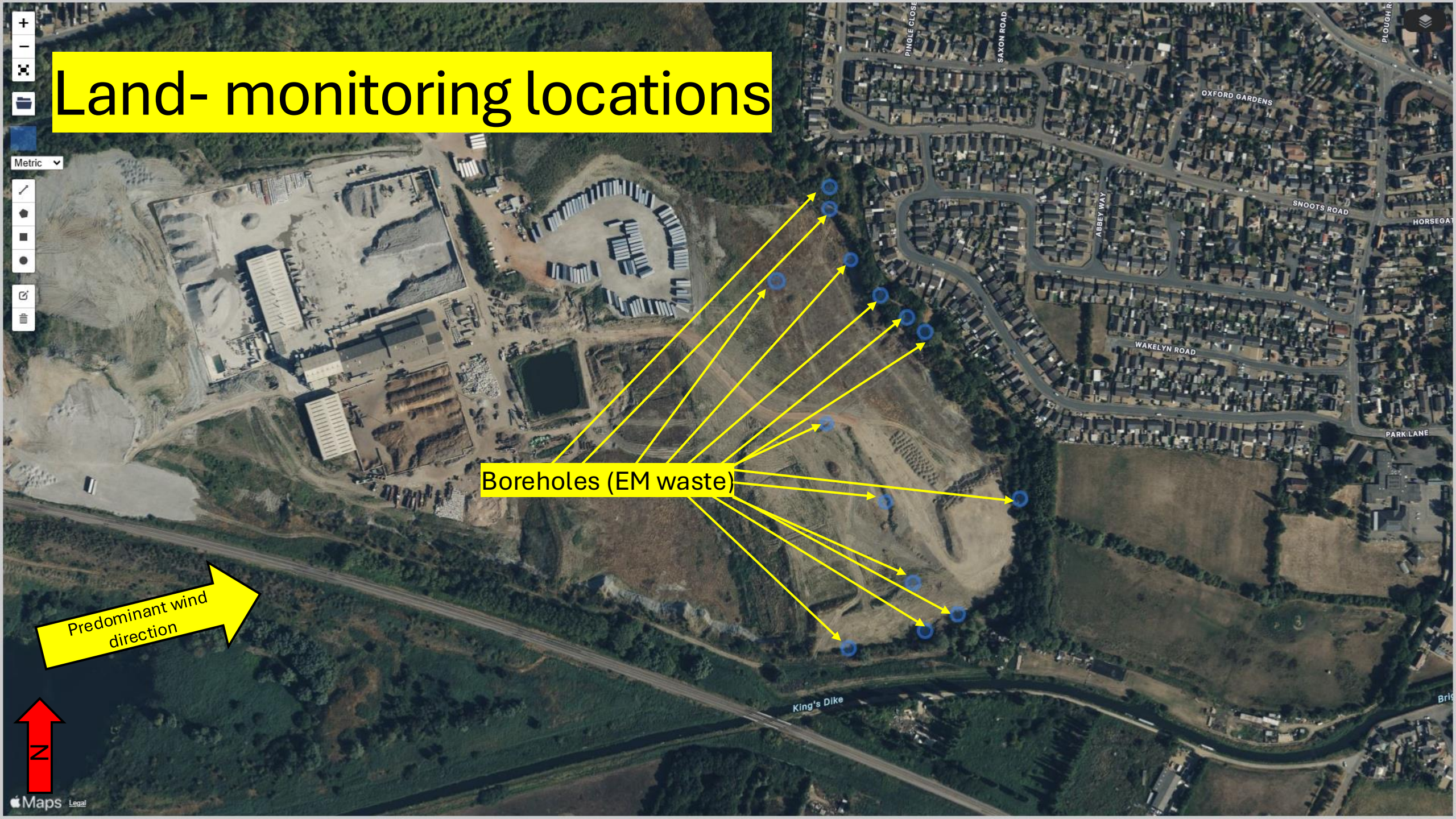
- Fugitive dust emissions are produced by Johnsons
- Fugitive dust sampling is undertaken by the operator using frisbee style dust deposit gauges as part of permitting conditions
- These data show elevated levels of dust being deposited onsite
- The gauges show deposited dust in a particular area on site; it is not possible to attribute any deposited dust to a particular source or to make inferences about air quality from these data
- It is important to note that deposition data cannot be compared with air quality standards, and therefore it is not possible to assess risks to public health based solely on these data

https://iaqm.co.uk/wp-content/uploads/2013/02/Construction-Dust-Guidance-Jan-2024.pdf

[1]Fugitive dust emissions here refers to dust which is not emitted from a point source, e.g. a stack or chimney

Air Quality: particulate matter off site

- Johnsons Aggregates Recycling Limited and the Environment Agency both have a frisbee style deposit gauge located off site, on Snoots Road (2 locations)
- These gauges show deposited dust in a particular area; it is not possible to attribute any deposited dust to a particular source or to make inferences about air quality from these data
- It is important to note that deposition data cannot be compared with air quality standards – it was therefore not possible to assess risks to public health based solely on this data
- The best located ambient air PM monitor to represent exposure for sensitive receptors (local residents) was the monitor run by Fenland District Council on Hallcroft Road; instrument downtime resulted in a significant gap in data collection in 2025
- The PM monitor was operational in June 2025; during this time, the data showed no exceedances of air quality standards for PM_{10} and $PM_{2.5}$
- Between February 2023 to January 2024, June 2024 to October 2024, and June 2025 to October 2025 the equipment operated continuously. To date 24 months of data has been collected. During this time no exceedances of the National Air Quality Objectives have been observed.
- Reference standards:
  - Air Quality Standard (AQS) for PM_{10}: 24 hr mean 50 µg/m^3 not to be exceeded more than 35 times a year, Annual Average 40ug/m^3
  - Air Quality Objective (AQO) for $PM_{2.5}$: Annual Average 20ug/m^3


Land- monitoring locations
Boreholes (EM waste)
Predominant wind direction
N
PINGLE CLOSE
SAXON ROAD
OXFORD GARDENS
ABBEY WAY
SNOOTS ROAD
WAKELYN ROAD
PARK LANE
King's Dike
Metric
Maps
Legal

Land

- Ground gas monitoring results were supplied by East Midlands Waste Management services (monitoring data was available for the period Jun 24- Jun 25)
- Ground gas was identified on site in this period
- The results showed no evidence of ground gas migrating off site, with perimeter boreholes showing no or low levels of ground gas with no or negative flow
- These results indicate there is likely to be a low risk to wider public health from inhalation of ground gas off site
- The IMT note an ongoing Environment Agency investigation into a breach of permit conditions (2017-18) linked to deposition of non-conforming waste as part of waste deposit for recovery activity

Odour

- IMT partner agencies have received odour reports and complaints linked to operations at Saxon Pit
- Reports and complaints data from the Environment Agency (data covered period Jan-Jul 25)
  - >50% complaints related to noise
  - 2 odour reports substantiated
  - No dust complaints were substantiated
- Complaints data from Fenland DC (data covered period Sep 23- July 25)
  - 30 substantiated complaints, relating to odour (one event relating to an activity out of scope of permit was linked to 29 complaints)
- None of the information on odours available to the IMT was relevant to a public health risk assessment – the IMT is unable to comment further on odour complaints

Public health risk assessment: recommendations for consideration

Water – Lagoon:

- EA to continue exploring potential regulation of the lagoon on site

Water – Kings Dyke:

- The sediment analysis has identified metal pollutants. In periods when the volume or flow rate of the Kings Dyke may be reduced, it would be pertinent to assess water quality if used for livestock.
- Private water abstractions should not be used for drinking water purposes and Environmental Health to review as part of private water supply / abstraction assessments.

Air quality:

- Given evidence of elevated levels of deposited dust on site, the EA may wish to ensure that dust management plans for on-site operators are being carried out effectively
- Director of Public Health and multi-agency partners to consider implementing long-term appropriate air quality monitoring in the area
- Once an air quality monitoring strategy has been developed, Director of Public Health to consider requesting UKHSA to review and assist with interpretation of any reported results

Contact and questions

For questions on this work please email:
health.protection@cambridgeshire.gov.uk

As we receive them, FAQs will be published here:
www.cambridgeshire.gov.uk/saxon-pit

Cambridgeshire County Council