

Jon Brier

From: Claire Tomalin - Principal Planning Officer <Claire.Tomalin@essex.gov.uk>
Sent: 07 October 2021 14:01
To: Christopher Lecointe; John Ahern
Cc: Jon Brier
Subject: Rivenhall IWMF

CAUTION: This email originated from outside of RPS.

Chris/John

Following from yesterday's liaison meeting there was information and points raised yesterday, which would be useful to clarify formally with respect to implementation of ESS/34/15/BTE and the current application ESS/34/15/BTE/66/01.

Temporary visitor/information building

I appreciate that these are still being developed, but when you are in position, it is suggested that a pre-application request is made to clarify what, if any planning permission would be required and access to such a facility.

Management of vegetation around the IWMF

Management of woodland and pond (by the gate to Woodhouse Farm access road) was mentioned. I would draw your attention to the Habitat Management Plan approved initially under condition 54 of SoS Decision (ECC Ref. ESS/38/07/BTE/54/1). The Plan was then updated as part of application Ref: ESS/34/15/BTE. Should you wish to propose different or additional management, I would suggest that a S73 to amend the details would be necessary. As mentioned at the meeting works to the TPO area would also require authorisation from Braintree DC.

Earth Bund south of IWMF, outside the application area.

Mention was made of planting up this bund at the liaison meeting. If I could explain a bit of the background to this area of planting. The original intention as secured in the S106 was this area would be planted up at an early stage after permission was granted. At the public inquiry proposals were revised, such that soils from the IWMF site under the area of TPO were to be stripped, so that the seeds source in the soils would regenerate local species. When the permission was implemented, rather than just topsoils being spread in this area, sub and topsoils were stored on this area. Also the amount of topsoil was found to be a lot less and of poorer quality than expected, probably due to historical disruption when it was an airfield. When the planting details were approved for this area, it was not envisaged they would be on a bund. Be aware the bund is in 2 parts the higher section closer to the existing woodland is subsoil, the lower section close to the transplanted hedge is topsoil (soil stripped from the IWMF area). There is no actual planning permission for this bund, but it has been in place since March 2016 and would assist in screening the facility. However if the bund is to be retained, then I think it would be beneficial if the subsoil is shaped and the topsoil spread over the subsoil. The approved planting details may need to be amended to reflect the different landform. This could be achieved through a s73 application.

ESS/34/15/BTE/66/01

Information was provided yesterday at the liaison meeting which would be useful to be able to refer to as part of consideration of the current application with respect to condition 66. However, in order to enable this I would appreciate if an additional supporting/statement letter could be submitted with respect to the application, covering the following points.

The options being considered for the use and steam, I believe at the meeting both district heating and cooling systems were mentioned. It would need to be made clear these are subject to further planning permissions.

What options are being considered for the space that would be available within the IWMMF if the MRF, MBT, AD facilities were not developed. My understanding from the meeting (subject to planning permission) were the following:

- Facility to recycle 120,000tpa of bottom ash into aggregate
- Facility to deal with bulky waste, such as mattresses etc

The current application refers to the possibility of applying for a DCO to allow power generation in excess of 50MW. Queries have been raised as part of the consultation that the need for the DCO arises from the possibility that the EfW facility might be increased in size to use the maximum amount of waste permitted to be imported by the planning permission i.e. 853,000tpa. My understanding from the liaison meeting and it would be good if this could be clarified, that the DCO arises not from increasing the input into the incinerator above 595,000tpa, but the incinerator would be more efficient and thus able to generate more electricity than was quoted in the 2015 application. In the 2015 application the combined power to be generated by the CHP and AD was approximately 50MW with 22MW used on site to power the various elements, leaving 28 MW for export to the grid. An explanation as to how it is now anticipated that there could be potential to produce in excess of 50MW for export to the grid would be beneficial.

Not mentioned at the meeting, but what would be the alternative for use of the heat and steam if no facility directly utilising the heat and steam could be found by the time the incinerator was operational? Subject to appropriate permission is there potential to generate more electricity from the heat and steam?

As you will have heard at the meeting there is concern that the facility will not be integrated, particularly with respect to the use of the heat and steam. However, on a slightly different point without the MRF & MBT, how would it be ensured that the all the waste to put input to the incinerator had had all recyclables recovered e.g. paper and plastics, such that it is only residual waste. There has always been concern raised that the incinerator would discourage recycling.

As stated it would be helpful if the above points could be clarified in a statement to support the "plan of action".

Regards

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