

PLANNING APPLICATION 16/00022/WASFUL

ADDITIONAL WOOD STORAGE YARD FOR THE STORAGE AND SHREDDING OF
WOOD WASTE MATERIAL FOR THE PERMITTED RENEWABLE ENERGY
GENERATION FACILITY (REGF) 13/00098/WASFUL FOR THE DURATION OF THE
REGF

PEBBLE HALL, THEDDINGWORTH ROAD, THEDDINGWORTH,
NORTHAMPTONSHIRE, LE17 6NJ

WELLAND WASTE MANAGEMENT LTD

Version 3
FINAL

Prepared by Gill Pawson
Updated by Maureen Darrie

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1 INTRODUCTION

A planning application seeking planning permission for an additional wood storage yard to store fuel for the permitted Renewable Energy Generation Facility (REGF) at Pebble Hall, Theddingworth (REF: 13/00098/WASFUL) was submitted to Northamptonshire County Council on 12 May 2016. It was accompanied by a detailed Justification Report, which set out the reasons for the development and the alternatives that had been considered and discounted.

At a meeting with Planning Officers of Northamptonshire County Council on 22 August 2016 it was agreed that a further report would be submitted, summarising the reasons why this proposed development has become necessary taking account of the latest changes in Environment Agency requirements relating to waste wood storage. This is an updated version of the Justification Resume to take into account recent discussions and amendments to the proposed site layout.

The additional wood storage yard is required as a consequence of the need to comply with the requirements of the Environmental Agency's Fire Prevention Plan Guidance (FPP). The planning application details were based upon FPP Version 2 - March 2015. However, at the end of July 2016 Version 3 was issued, which has amended some of the waste storage criteria. Therefore, a revised site layout plan has been prepared, based upon the following dimensions set out in the FPP:

- Maximum pile size of 750 cubic metres for 150mm and above
- Maximum pile size of 450 cubic metres for 30mm to 150mm
- Maximum pile height of 4m
- Maximum length or width of each pile of 20m
- Separation distance between piles of at least 6m

The original site layout, shown on submitted Drawing GPP/WWM/PHYW/16/04 Revision 3, was based upon the guidance contained in version 2 of the FPP. It was designed to minimise the overall footprint, and space required for the wood storage while adhering to the requirements of the FPP. Instead of separate stockpiles of wood, which would have required greater land take, it used units of four piles contained within concrete bays defined by 6m high concrete block walls, 800mm wide. Each bay was designed to contain 100 tonnes, so a block of 4 bays would contain 400 tonnes.

The original scheme showed 11 blocks of 4 bays providing 4,400 tonnes of storage. This was designed to replace the storage lost on the existing wood yard as a result of the need to comply with the new FPP requirements (see Reasons for the Development). To provide additional flexibility and to make best use of the space within the field a further 9 bays were incorporated into the site layout providing an additional 900 tonnes, making a total storage capacity in the new wood yard of 5,300 tonnes.

When the planning application was submitted, it would have been possible for the existing wood yard to store only 750 tonnes of waste as a result of the FPP rather than the previous amount of 5,000 tonnes.

To take account of the reduced wood waste pile height now permitted, the height of the bays has been reduced by 1m to 5m; the revised construction details are shown on Drawing GPP/WWM/PH/16/08 Revision 3. Taking account of the latest requirements for the layout of stockpiles, a revised arrangement that meets the latest standards is shown on the revised Site Layout Plan GPP/WWM/PHYW/17/04 Revision 1 which is included in the ES Addendum submission.

2 PROPOSED OPERATIONS

Vehicles will bring wood waste onto the site in HGV vehicles. These will be weighed on a weighbridge before travelling directly to the shredding shed/storage area or to the waste reception area, shown on GPP/WWM/PHWY/17/01/Revision 1.

Pre-shredded waste arriving at the site will be taken directly to the shredding shed/storage area before being further shredded and used as a fuel for the REGF. If there is a shortfall of material for the REGF that day wood waste will be taken directly to the shredding shed/storage area.

All other wood waste, that is not shredded, will be delivered to the proposed wood storage area.

The wood waste will be deposited in the storage bays. When required, the wood will be passed through a slow speed shredder and deposited directly into a walking floor vehicle for transportation to the shredding shed/storage area. Shred will be not less than 150mm.

During storage the material will be turned to reduce the risk of overheating and monitored with temperature probes.

Prior to being fed into the REGF, the wood waste will be shredded to a finer consistency, stored as necessary and transferred into the REGF using a loading shovel or conveyor.

Waste wood flows are shown in Appendix 1.

3 REASONS FOR THE DEVELOPMENT

The proposal is an essential component of the existing REGF, enabling the storage of waste wood on site. This application does not seek any changes in waste inputs. It is purely to allow a larger storage area for the wood in order to comply with the FPP and provide a safe operating environment.

Environment Agency's Fire Prevention Plan Requirements

At the time that planning permission was granted for the REGF, the wood storage and shredding activities at Pebble Hall already had both a Planning Permission and an Environmental Permit for a total of 40,000 tonnes of wood waste per annum. The REGF planning permission granted approval for an increase of 32,000 to 72,000 tonnes of wood waste imports per annum, which equates to a usage rate of 200 tonnes per day. It was proposed to carry on using the existing wood storage area of the Pebble Hall complex to both store and shred material once the REGF was operational. Prior to the Environment Agency issuing its FPP Guidance in March 2015, the Environmental Permit allowed the operator to store 5000 tonnes of material on site.

The Applicant would not be seeking approval for the new wood yard if it had not been forced to by the FPP requirements. The new yard, which will have to be concreted with a contained drainage system, will require approximately 1,140 m of 5m high concrete block walls which would bring the total estimated cost to well over £1m.

Where the Applicant previously could store 5000 tonnes of material in one large pile in the existing wood yard, it was calculated under the FPP v2 standards that only 750 tonnes of processed material

(150mm to 70mm) ready to be transferred to the REGF could be stored in the same area, which is an allowance for approximately 3.5 days supply for the REGF.

Under the FPP v3 standards, wood shredded to a size of 70mm must be stored in smaller stockpiles of 450 cubic metres which still equates to 100 tonnes per bay. The proposed layout for the existing wood yard is shown on the revised Proposed Site Layout Plan GPP/WWM/PHP/16/08 Revision 3. In addition to a space now occupied by a shredding shed (to be subject of a separate planning application), the area can now accommodate 3 bays for processed material (70mm) ready to be taken to the REGF, and a block of 4 bays to hold material ready for shredding i.e. 400 tonnes. Therefore, the maximum storage within this area is now 700 tonnes.

A Fire Prevention Plan has been submitted to the Environment Agency. This is currently being amended to reflect the latest layout and to address detailed comments from the EA.

For the reasons explained in this Report, the Applicant needs to be able to store the balance of material elsewhere on site to ensure a continued supply of wood fuel is available to serve the REGF when it becomes operational later this year.

The revised site layout accommodates the FPP Guidance, provides wood storage at levels to service the REGF and addresses the issue of 'scale' by reducing the development footprint.

The original wood yard layout submitted with the application proposed a storage capacity of 5,300 tonnes.

The revised Site Layout Plan GPP/WWM/PHWY/17/04 Revision 1 shows a revised storage capacity of around 3,600 tonnes. A further planning application will be submitted for additional bays on the area to the north of the TAD building to provide the level of storage necessary to ensure a continued supply of fuel to the REGF.

The physical development footprint of the storage yard is reduced from 3.2 hectares to 1.75 hectares.

Seasonal Fluctuations in the Availability of Wood Waste

The REGF biomass facility requires a consistent supply of wood waste material in order to keep the plant running continuously. As a result there needs to be sufficient storage space to allow for seasonal fluctuations in the availability of wood waste.

Larger amounts of wood waste are available in the summer months, when the building industry is at its busiest, as opposed to the winter months, especially over the Christmas period when the industry shuts down for 2 weeks. During the summer, it is anticipated that deliveries will average 300 tonnes per day, dropping to 100 tonnes per day during the winter, with very little over the Christmas period.

Under the provisions of the FPP v3, wood waste can be stored in a stockpile for up to 6 months, provided that active management measures are in place to reduce the risk of self-combustion. A Fire Prevention Plan has been prepared for the site, which has been discussed with the Environment Agency, which incorporates all of the latest measures set out in FPP v3 and will enable storage for up to 6 months if necessary. However, most material received on a daily basis, having undergone preliminary treatment, will be moved to the existing wood yard for further processing ready for transfer to the REGF.

The excess wood delivered daily i.e. above 200 tonnes, will be stockpiled in the proposed storage area. The storage area would only be full at certain times of the year and is essential in the winter months given the lack of wood in the market place.

The proposed storage capacity of 3,600 tonnes only provides 16-18 days' supply requirements for the REGF (at inputs of 200-220 tonnes per day). Given that little or no inputs are expected over the Christmas period of 14 days, this would provide just enough material to cover this time.

The proposed storage bays to the north of the TAD building will provide another 3 days' supply.

Problems for Potential Suppliers

Welland Waste Management has built up a network of wood waste suppliers within their permitted catchment area since they have been operating their wood waste storage and shredding operations. These suppliers had previously been lined up to supply wood waste to the permitted biomass facility. However, since the update to the Environment Agency's guidance, all of these suppliers have withdrawn from this commitment citing lack of space available to store the required amount of wood waste. Letters from these suppliers confirming their position were included in Appendix 2 of the Justification Report submitted with the planning application.

It is extremely difficult for to secure wood waste contracts without the ability to provide adequate storage.

Welland Waste Management is in a very fortunate position of having other land available to consider an extension to their current yard in order to accommodate the additional land requirements set out by the Environment Agency. This is not an option open to very many suppliers of wood waste.

Welland Waste Management has looked at a number of storage layouts and believe that the revised layout, along with the additional bays proposed, gives the REGF security of supply and provides a storage facility that is appropriate in scale for this locality.

Alternative Supply Options

It is possible that an alternative supplier of the wood waste to the REGF biomass facility could be found. This company would need to have a site within the permitted catchment area and be able to provide a consistent supply to the REGF all year round. Welland Waste Management currently has the space for 700 tonnes of wood waste at Pebble Hall, so the alternative supplier would have to be able to supply Welland Waste Management on a "just in time basis". This is undesirable as it would lead to HGVs having to ensure deliveries in accordance with tight timescales, with little flexibility in the schedule. Of particular concern to a supplier and haulier would be periods of bad weather when traffic/road conditions may interrupt movements and thus supply. During such times deliveries would have to be made at night, which would be likely to cause disturbance to the neighbours on the access route.

The Applicant has spoken to a number of the large waste wood suppliers but the response has consistently been that they would not be interested in supplying such a small amount of waste wood.

A contract for the supply of fuel stocks to the REGF plant exists between Welland Waste Management and Welland Bio Park Ltd. These are separate companies with separate owners and external investors. That contract requires minimum fuel stocks to be maintained at the site in order to ensure a consistent fuel supply at all times.

Welland Bio Power Ltd confirm that none of their biomass plants operate on a 'just in time' basis. Such a system presents too great a risk to the ability of the REGF to perform its vital role in plugging the energy gap.

Alternative Offsite Wood Waste Storage Sites

A search for an alternative site has proved abortive, as explained in detail in the submitted Justification report. A further, recent search identifies one potential site but the landowner was not interested in this type of use.

4 SCHEME CHANGES

The site layout has been adjusted to reflect the latest FPP requirements, as described above.

To reduce the scale of the wood storage yard, and avoid the need for the submission of fresh application, it is proposed that the storage bays located in the south-eastern part of the site are removed. Land to the west of the existing track is utilised to provide three groups of 12 bays, with appropriate spacing. This significantly reduces the scale of the development footprint to 1.75 ha and provides opportunities for land modelling to screen the south-eastern area and the provision of additional planting.

5 UNILATERAL UNDERTAKING

A S.106 Unilateral Undertaking has been prepared and a Draft has been submitted to Northamptonshire County Council. It was based on a commitment by Welland Waste Management and the Clarke Family not to carry out or permit the carrying out of any waste management operations or waste development outside the concreted area that will be used for waste storage. Additionally, the owners undertake to use the wood that is stored in the wood storage yard as a fuel source for the REGF only. The text and Drawing are currently being revised and a more clearly worded draft and revised plan, reflecting the current layout, will be submitted in due course.