

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

Day Month Year  
26/08/2016  
13/11/2016



# 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 development has become necessary taking account of the latest changes in Environment Agency requirements relating to waste wood storage.

The additional wood storage yard is required as a consequence of the need to comply with the requirements of the Environment Agency's Fire Prevention Plan Guidance (FPP). The planning application contents and site layout 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 and accommodating concerns raised by Officers regarding perceived scale of the physical development footprint:

- 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 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 allowed (under the FPP Guidance 2016), 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 2. Taking account of the latest requirements for the layout of stockpiles, a revised site layout arrangement that meets the latest standards is shown on the revised Site Layout Plan GPP/WWM/PHYW/16/04 Revision 12 which supersedes the layout submitted with the planning application.

## 2 PROPOSED OPERATIONS

Vehicles will bring wood waste onto the site in HGV vehicles. These will be weighed on a weighbridge before travelling to the waste reception area, shown on GPP/WWM/PHWY/16/04/Revision 12.

The wood waste will be delivered alongside the next bay to be used, tipped onto the concrete floor and then shredded in a mobile slow speed shredder direct into the bay. Shred will be not less than 150mm, in order to reduce the void in the material and as a consequence the space required for storage. However, it will be necessary to maintain sufficient space so that there is less risk of a build up of heat.

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 biomass facility, the wood waste material will be transferred from the new wood storage yard to the existing wood yard using a loading shovel. It will then be shredded to a finer consistency, stored as necessary and transferred into the REGF biomass facility using a loading shovel or conveyor.

## 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 a development 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 tonnes of wood waste imports to 72,000 tonnes of wood waste 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 and updated Guidance in July 2016, the Environmental Permit allowed the operator to store 5,000 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 800m of 5m high concrete block walls which brings the total estimated cost to well over £1m.

Where the Applicant previously could store 5,000 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 (July 2016) 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 2. In addition to a space for the siting of the shredder, 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.

A Fire Prevention Plan has been submitted to the Environment Agency and this will need to be altered to take into account the further proposed changes.

For the reasons explained in this Report, the Applicant needs to be able to store a balance of material elsewhere on site to ensure a continued supply of wood fuel is available to serve the REGF when it is operational in 2017. Plant commissioning will commence in early 2017.

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

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

The revised Site Layout Plan GPP/WWM/PHWY/16/04 Revision 12 shows a revised storage capacity of 4,200 tonnes. This is a reduction in storage of 1,100 tonnes in the proposed new yard (a reduction of over 20%).

The physical development footprint is reduced from 3.2 hectares to 2.45 hectares.

### **Seasonal Fluctuations in the Availability of Wood Waste**

The REGF biomass facility requires a consistent and continuous 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 July 2016, 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 July 2016 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 4,200 tonnes only provides 21 days of supply requirements for the REGF (three weeks). Given that little or no waste inputs are expected over the Christmas period of 14 days, this would provide just enough material to cover this time, plus about 7 days' storage in the

event that there are other days with no inputs. 7 days provides relatively little extra storage, particularly if there is a severe winter.

### **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.

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

### **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 have 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 are 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 cause disturbance to the neighbours on the access route.

The Applicant has spoken to a number of the large waste wood suppliers and has been told that they would not be interested in supplying such a small contract of waste wood.

### **Alternative Offsite Wood Waste Storage Sites**

A search for an alternative site has proved abortive, as explained in detail in the submitted Justification report.

## **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 eastern part of the site are relocated to the western part of the site adjacent to the waste reception area. The result is that a large part of the eastern 'leg' of the application area is no longer needed and an area of 0.75 hectares is removed from the development footprint. Additional planting is proposed (0.23 hectares) allowing part of the original proposed yard to be retained in agricultural use.

## **5 UNILATERAL UNDERTAKING**

A Draft S.106 Unilateral Undertaking is being prepared and will be submitted to Northamptonshire County Council shortly. It is based on a commitment by Wellland Waste Management and the Clarke Family that no further applications for planning permission will be submitted for waste related developments on land outside the existing red line boundary of development, comprising the Composting Area, the existing wood storage area, the REGF, the TAD and the new wood yard.