ENVIRONMENTAL STATEMENT

in support of an

Application for Removal or Variation of a Condition

following grant of Planning Permission.

Town and Country Planning Act 1990

1. Introduction

1.1 This Environmental Statement is submitted in support of an application under Section 73 of the Town and Country Planning Act 1990 (the "**Section 73 Application**") to amend the development contemplated by planning decision number 8/58/7BS/Pa in respect of planning application **2016/1456/EIA**.

1.2 The submission is being submitted on a mandatory basis since the proposed development in its modified format is still an "**EIA Development**" within the provisions of The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (the "**EIA Regulations**").

1.3 Due to the modifications contemplated in the Section 73 Application and following a Scoping Report in 2016, the development was considered by the Planning Authority to fall within Schedule 2 of the EIA Regulations; however, due to the nature, size and location of the development as set out in Schedule 3 of the EIA Regulations, an Environmental Statement was nevertheless deemed necessary by the Planning Authority.

1.4 The following sections of this Statement comprise the mandatory information required under Part 2 of Schedule 4 of the EIA Regulations supplemented for the purposes of Part 1 of Schedule 4 with further information by reference to the Environmental Statement dated 13th December 2016 submitted by Fisher German in connection with planning decision number 8/58/7BS/PA (the "**Original EIA Statement**").

2. Information required under Part 2 of Schedule 4 of the EIA Regulations

2.1 Description of the development comprising information on the site, design and size of the development

2.1.1 Site: refer to Section 3 of the Original EIA Statement.

2.1.2 Design: refer to Section 4.4 of the Planning Statement supporting the Section 73 Application, Section 4 of the Original EIA Statement and the following elevation documents:

Elevations towards West and North- 26476/6 REV C

Elevations towards East and South- 26476/7 REV C

submitted with the original application, 8/58/7BS/PA.

2.1.3 Size: the size of the proposed development remains as set out in the Original EIA Statement and planning decision number 8/58/7BS/PA, except as varied by the design modifications described in Section 4.4 of the Planning Statement supporting the Section 73 Application, being limited to a potential increase in the stack height from 45m to 50m if required for the purposes of the Environmental Permit.

2.2 Description of the measures envisaged in order to avoid, reduce and, if possible, remedy significant adverse effects.

2.2.1 Significant adverse effects: the development site is a vacant area of land within an industrial business park. The development comprises a new power station with accompanying buildings and facilities and 8000m^2 of warehousing, as more particularly described in Section 4 of the Original EIA Statement subject to changes proposed in the Planning Statement supporting the present Section 73 Application.

Significant adverse effects are as discussed in the Original EIA Statement but primarily relate to the operation of the plant and its emissions which will be controlled by the Environmental Permit to ensure it complies with applicable regulations. This remains unchanged.

From a planning perspective, the only potential impact is to visual amenity in the event that the stack is increased in height from its present 45m. Such increase being not more than 5m, it is not considered that there will be any significant adverse effects associated with the development incorporating the stated modifications from an environmental perspective taking into account the continuing requirement to obtain an Environmental Permit.

2.2.1 Avoidance, Reduction and Remedy measures: notwithstanding that the development should not give rise to any additional significant environmental effects, the following summarises the principal measures to be employed to mitigate environmental risks connected with the plant and its operation:

(a) Off-site Feedstock preparation: The off-site pre-processing of waste removes the need to store large volumes of feedstock and recyclates such as ferrous, non-ferrous metals, plastics and fines on-site.

(b) Ash: Ash is a by-product of the combustion process and can be used for building products such as block manufacture. It will be removed from site for recycling in sealed transport.

The filter/abatement process designed to control emissions also produces a low volume of waste residues (fly-ash) which will be transported to a specialist, regulated processor in sealed containers. The exact tonnage will depend on the abatement technology which the Environment Agency requires for the purposes of the Environmental Permit.

(c) Emissions: The chimney stack will have no visible air emissions as particulates will be controlled using the abatement equipment agreed with the Environment Agency. All steam will be condensed in a sealed system via the air-cooled condenser.

The plant will require an Environmental Permit from the Environment Agency and the combustion process must meet strict limits on air emissions specified in the Environmental Permit. This includes a need to agree the proposed abatement technology to minimise air emissions before the site can operate and confirmation that the Best Available Technology (BAT) has been employed. Therefore, local air quality will not be adversely affected by the proposals.

(d) Noise: Best practicable means, including acoustic attenuation measures, will be used during site operations to ensure that noise does not exceed agreed levels. The enclosure of the process entirely within buildings will ensure that noise levels are not significant.

The Plant will be designed to meet the BAT (Best Available Technology) requirements of the Environmental Permitting regime, which include noise emission controls. The steam turbine produces the most noise but is enclosed within an acoustically attenuated compound within the building.

The plant as a whole is designed to be fully compliant with applicable dBA requirements. The roller shutter doors will generally be closed except to receive deliveries in order to provide additional acoustic attenuation.

(e) Dust: There is no material change to the proposed environmental control measures. Site operations will be carried out to minimise the creation of dust. A mains water supply will be available and all external water pipes are lagged to prevent frost damage. Water sprays and/or bowsers will be used as necessary to reduce dust levels in external circulation areas. Staff will monitor dust emissions continuously whilst the plant is in operation and will take appropriate action when required. Regular visual inspection will take place with results recorded in a diary.

(f) Mud / detritus: Measures will be put in place to prevent any deposit of debris on the highway. There will be regular visual inspection and a road sweeper will be deployed as necessary, including during the construction phase.

(g) Odour: - The Plant itself does not produce odorous emissions. The feedstock is refuse-derived fuel pre-processed before arrival at site and will be delivered in enclosed trucks. It will be unloaded within the feedstock storage building which will operate under negative pressure to prevent emission of unfiltered air. Entrances into the storage building will be via electrically operated roller shutter doors with additional 'air blade' protection.

(h) Pests / vermin: - The proposed fuel type (refuse-derived fuel pre-processed prior to arrival at the site) will ensure that the site will not suffer from a vermin infestation. However, the site will be inspected daily given the presence of nearby water bodies and a pest control contractor will be hired if necessary.

2.3 Data required to identify and assess the main effects which the development is likely to have on the environment.

This remains as stated in the Original EIA Statement other than data relating to traffic movements which are covered in the accompanying Transport and Traffic Addendums.

2.4 Outline of the main alternatives studied by the applicant or appellant and an indication of the main reasons for the choice made, taking into account the environmental effects.

2.4.1 Alternatives & Choice: The main alternatives studied by the applicant and reasons for the choice made are as detailed in Section 6 of the Original EIA Statement.

2.4.2 Changes under the Section 73 Application:

(a) Increased Feedstock

Though the power export to the national grid will remain the same at up to 14MW of electricity the developer intends to increase the size the Plant to allow for the export of up to 18MW of electricity and up to 4MW of heat, the increase intended to be available to local businesses such as Kingspan. This requires the throughput of feedstock to be increased to up to 200,000 tonnes per year in order to allow the Plant to operate on a continuous basis in an efficient manner.

Such an increase will not only allow Kingspan to further its own green energy targets, but also aid in the nationwide effort to reduce landfill waste by recovering an extra 68,000 tonnes of waste per year.

(b)_Feedstock Range

While it is expected that suppliers of feedstock will primarily be located within a 50 mile radius of the Plant due to more advantageous transport costs, the project's funders will require greater flexibility in order to demonstrate long-term security of supply. It is, however, intended that all feedstock be sourced from within the UK, not imported.

The Applicant, with the assistance of a feedstock aggregator, will endeavour to locate feedstock suppliers in as close proximity as possible to the project site, however, it is necessary that the project is not bound to a specific distance in order to be financeable.

(c) Traffic Movements

As stated in paragraph 2.4.2 a) above, the Applicant has requested that the previously consented 132,000 tonnes per annum (referenced in the Environmental Statement and Transport Statement and thus Condition 2 of the 2016 Permission) be increased to 200,000 tonnes per annum, therefore requiring an increase in the number of deliveries of feedstock to the Plant.

Separate from the delivery of feedstock, the Plant will create ash waste requiring disposal off-site. Delivery of consumables to the Plant must also be taken into consideration. Ash and consumables equate to approximately 20% of the total feedstock tonnage and will require a separate allowance for traffic movements. This was also the case with the original consented application.

Although the necessary traffic movements for the Plant will rise due to the increase in power output and subsequent need for additional feedstock, once broken down to a day by day level the overall effect is negligible. By using a feedstock aggregator that sources feedstock from multiple waste providers the project is able to moderate its overall road usage, preventing any one delivery route from experiencing materially increased usage and therefore minimising the effect on the environment.

For more information on the changes to traffic movements related to the CHP plant please refer to the Transport Statement Addendum and Traffic Addendum submitted in support of the present Section 73 Planning Amendment.

(d) Elevations

The amendments now proposed retain the layout of the 2016 Permission but allow for a potential increase in the stack height to up to 50m which is expected to be acceptable to the Environment Agency - the amended plant design will continue to require an Environmental Permit from the Environment Agency and this aspect will come under scrutiny as part of that separately regulated process.

The only amendment to the currently consented elevations would be for the option to increase the chimney stack height from 45m to up to 50m due to the potential increased volume of exhaust gas emissions. The stack height will only increase, however, following discussions with the Environmental Agency at the time of applying for the environmental permit.

The area surrounding the site is of an industrial nature. Although the chimney stack is likely to be one of the larger structures in the area, an increase from 45m to up to 50m will not be detrimental to the surroundings: from a visual amenity standpoint, a potential increase of up to 5m will not be noticeable from the nearest residential areas which are located approximately 700m to the west and 500m to the north. From an environmental standpoint, it will be neutral since the height will simply be a function of maintaining emissions within existing regulated limits.

2.5 Non-technical summary of the information provided under paragraphs 2.1 to 2.4

Refer to Non-Technical Summary 09/12/16 submitted as part of the Original EIA Statement, except as varied by the modifications described in Section 2 of the Planning Statement supporting the present Section 73 Application.

2.6 Information under Part 1 of Schedule 4 of the EIA Regulations

Reference is made to the Original Environmental Statement in respect of additional detail referred to in Part 1 of Schedule 4 of the EIA Regulations, to the extent not discussed in the preceding paragraphs 2.1 to 2.4.