Ms. H Wass
County Planning Materials and Waste
Cambridgeshire County Council
Box No. SH1315
Shire Hall
Castle Hill
Cambridge
CB3 OAP

3/6/18

Dear Ms. Wass,

Planning Application H/5002/18/CW - Construction of a heat and power plant comprising biomass energy from waste (fluidised bed combustion) facility and treatment of waste water by evaporation treatment plant and associated infrastructure comprising tank farm, combuster with 25m high chimney, process building, store building, office building, walking floor canopy, car park, fuel storage bays, fire water tank, conveyor, pipe gantry, diesel tank, control room, auxiliary plant skid, high voltage transformers at Warboys Landfill Site, Puddock Hill, Warboys.

I am responding to this application on behalf of WLAG. My comments concentrate on the Development plan, the issue of need and the waste hierarchy. They should be taken together with the objections of others in relation to highways, nature conservation and leachate treatment and health risk issues.

It is concluded that the application is not consistent with the development plan and that it follows there is a need for the applicants to justify the need for the application and to demonstrate consistency with the waste hierarchy. They have not done so and there is a serious risk that the application would mean over-provision of capacity low in the waste hierarchy which would undermine material recovery/recycling, particularly of Grade B wood and/or increase transport distances unreasonably.

Furthermore the intensification of industrial development in the site at Puddock Hill would be harmful to the quality of local environment. There are no over-riding considerations which would justify the approval of the development and it is recommended that it should be refused.

Development Plan

In Cambridgeshire there is a suite of different documents which have been prepared by the district councils and the county council, which together provide the spatial planning strategy for the area. The Development Plan

- The Huntington Local Plan Saved Policies (adopted December 1995, and updated in 2002);
- The Huntingdonshire District Council Local Development Framework Core Strategy (adopted September 2009);
- The Cambridgeshire and Peterborough Minerals and Waste Core Strategy Development Plan Document (adopted July 2011); and
- The Cambridgeshire and Peterborough Minerals and Waste Site Specific Proposals Development Plan Document (adopted February 2012).

This is detailed in the application and supporting statement, with reference to the relevant policies. What is notably missing from the application, however, is any commentary on how the application measures up to the policy framework - particularly on a policy specific basis. The consequence is that the applicant "skates very quickly over some very thin ice" in relation to compliance with policies. This is particularly important in relation to the failure of the applicant to demonstrate any waste management 'Need' for the proposed development.

The National Planning Policy for Waste (October 2014) states that waste planning authorities should:

"only expect applicants to demonstrate the quantitative or market need for new or enhanced waste management facilities where proposals are not consistent with an up-to-date Local Plan. In such cases, waste planning authorities should consider the extent to which the capacity of existing operational facilities would satisfy any identified need".

In this case, as can be seen below, the proposals are NOT consistent with an up-to-date local plan. No need for energy for waste treatment of wood waste is identified in the application. Furthermore no need for energy for waste treatment of wood waste is identified by the Cambridgeshire and Peterborough Minerals and Waste Core Strategy Development Plan Document (July 2011) or in the very recent (May 2018) consultation on it's replacement.

The Huntington Local Plan (December 1995)

The saved policies from this plan are longstanding but are not dated - their importance to the protection of the countryside and the environment is as great as ever.

Saved **Policy EN17** relates to Development in the Countryside and states:
"Development outside defined village environmental limits and on unallocated land outside the built-up framework of the market towns will generally be restricted to that which is essential to the efficient operation of local agriculture, horticulture, forestry, permitted mineral extraction, outdoor recreation or public utility services."

The application is clearly not in accordance with this policy as it is outside defined village environmental limits and not on land allocated for energy for

waste operations - nor is it "*essential to the efficient operation of local agriculture, horticulture, forestry, permitted mineral extraction, outdoor recreation or public utility services.*"

Saved **Policy EN25** relates to Design and states:
"The District Council will expect that new development will generally respect the scale, form, materials and design of established buildings in the locality of the application site and where appropriate make adequate provision for landscaping and amenity areas."

The proposed energy from waste plant does not respect the scale of the established buildings in the locality as it is significantly larger than the adjacent MRF (itself an anomalous feature in this landscape) and notably more intrusive by having a tall stack which breaches the skyline of the ridge when viewed from the adjacent fen.

Saved **Policy CS8** relates to Water and states:
"The District Council will require satisfactory arrangements for the availability of water supply, sewerage and sewage disposal facilities, surface water runoff facilities and provision for land drainage when considering planning applications for development."

This is important because it appears that according to the Fire Protection Plan Guidance inadequate provision has been made on the site for the storage of fire water for the site and it has not been demonstrated that the water supply is adequate to satisfy the shortfall. More detail is provided on the shortfall below.

The Huntingdonshire Local Development Framework Core Strategy (September 2009)

Policy CS1 relates to Sustainable Development and states:

"All plans, policies and programmes of the Council and its partners, with a spatial element, and all development proposals in Huntingdonshire will contribute to the pursuit of sustainable development. Reflecting environmental, social and economic issues the following criteria will be used to assess how a development proposal will be expected to achieve the pursuit of sustainable development, including how the proposal would contribute to minimising the impact on and adaptability to climate change. All aspects of the proposal will be considered including the design, implementation and function of development.

The criteria include:

- *Encouraging waste reduction and recycling;*

This has not been addressed because the applicant has not properly considered the need for the proposal or the consistency of the proposal with the waste hierarchy.

Furthermore this policy requires:

- *An assessment will be required to accompany any proposal for major development to demonstrate how the criteria have been met."*

This is a major development with potential impacts on the environment which require a mandatory environmental assessment. In spite of this no assessment has been included of how the criteria in Policy CS1 have been met.

The Cambridgeshire and Peterborough Minerals and Waste Core Strategy Development Plan Document (July 2011)

Policy CS2 outlines the Strategic Vision and Objectives for Sustainable Waste Management Development
"to determine waste planning applications in the light of the principles for sustainable waste management i.e. sustainability, self-sufficiency, proximate management of waste, and the waste hierarchy"

The applicant has not provided adequate information on these issues and the proposal risks undermining sustainable waste management by incinerating materials which should be recovered for recycling, contrary to the waste hierarchy. This is particularly relevant in relation to the (unquantified) levels of Grade B wood waste it is proposed to incinerate in the energy from waste facility.

The objectives of the policy include:

- the *proximate management of waste* and *minimizing the movement of waste* - which are not secured by this application as explained in more detail below.
- safeguarding the *residential amenity of new and existing communities in Cambridgeshire* - the application is very close to the nearest residential properties and threatens serious disamenity impacts associated with traffic, noise, emissions, odour and visual intrusion

Policy CS14 says that the provision made in the plan is sufficient for local waste needs until 2026

The issues that the MWCS a planning application will need to address in order to give the Minerals and Waste Planning Authorities adequate information to be able to fully consider the proposal are given at para 11.96 and include:

- *the need for the development (in particular waste) and markets to be served*

- *type and quantity of waste to be deposited or handled at the site, including estimated annual throughput, and arrangements for the disposal of residues*

Policy CS15 relates to the location of future waste management facilities and outlines the main considerations for location of sites including:

- *the need for waste management facilities*
- *the existing network of waste management sites*
- *'Netwaste Optimal Localities' for waste management facilities*
- *new developments (including new settlements / urban extensions)*
- *employment / previously developed land*
- *environmental constraints and designations*
- *existing / planned mineral workings*
- *site availability*
- *highway capacity and safety the need to minimise the movement of waste*
- *sensitive receptors*

In this application there are serious gaps in the information required for consideration of this proposals as part of an integrated and adequate network of waste management sites. The need for the site has not been established, for example, and there is no information included in the application about the existing network of sites available for the treatment and processing of wood waste. These omissions risk undermining the waste hierarchy, increasing climate change impacts (which are lower for recycling than energy recovery) and increasing traffic impacts by increasing the distance waste are moved.

Policy CS17 relates to Waste Water Treatment Works and from the text of the plan (see s 7 is directed towards treatment works for municipal waste water discharged to sewers - para 7.38, for example, confirms that " a treatment works would receive waste water via the sewer network". The policy is not helpful to the applicant even if applied to this proposal, however as it says:
"New waste water treatment capacity, including the improvement or extension to existing works, will be considered favourably where it is required to meet the growth in Cambridgeshire and Peterborough"

This proposal has no material impact or linkage with the growth in Cambridgeshire and Peterborough and is certainly not "*required to meet the growth*" nor is there ready access to the *sewer infrastructure* as required by the policy.

The proposed site is immediately adjacent to, and partly overlapping, a waste management allocation in the plan. It is, therefore, outside the allocated area. It is also, however, rather unusual in being so proximate to the land which was considered in detail in the plan making process for waste management uses. Those considerations are therefore relevant to the current application if the plan is to be interpreted consistently.

Policy SSP W1 relates to Waste Recycling and Recovery Facilities (Non-Landfill) and allocates Puddock Hill, Warboys (Reference W1V) for waste recycling and recovery facilities. The boundary for allocation reference W1V is shown on the plan below:

The allocation is supportive of the following technologies: in-vessel composting, materials recovery facility, inert waste recycling, and new waste technologies.

The supporting statement is, however, silent on the technologies for which the allocation is not supportive:

Ref	Site Name	Area of Search	Materials Recovery Facility	Household Recycling Centre	Energy from Waste	Specialist	In Vessel Composting	Inert Waste Recycling	Inset Map No
W1V	Puddock Hill, Warboys	No	Yes	No	No	No	Yes	Yes	58

Most significantly the site was considered unsuitable for "energy from waste" uses[1].

In short, the Purdock Hill site had been carefully and thoroughly considered for suitability for different technologies as part of the plan making process and dismissed as unsuitable for these technologies. For completeness it is noted that the site was also considered and dismissed as being unsuitable for specialist operations - which are likely to include the evaporative treatment of leachates as a specialist waste management operation.

The proposal is therefore not consistent with the spatial strategy for waste management being immediately adjacent to, and partly overlapping, a site for which this type of technology was rejected.

Policy CS18 Deals with Waste Management Proposals Outside Allocated Areas and states:
Proposals for waste management development outside allocated areas will be considered favourably where :-

- *this is consistent with the spatial strategy for waste management, and*

[1] there is no doubt that this is an energy from waste facility and this is even included in the description of the application (although the SS appears to be oddly reluctant to describe the application as such - quite possibly for this reason - and only does so in the final paragraph (6.0.8): "a heat and power plant comprising of biomass energy from waste (fluidised bed combustion) facility")

- *it can be demonstrated that they will contribute towards sustainable waste management, moving waste up the waste hierarchy*

- to determine waste planning applications in the light of the principles for sustainable waste management i.e. sustainability, self-sufficiency, proximate management of waste, and the waste hierarchy

The plan did not envisage any facility of this type being necessary over the plan period - and certainly not in this location. The applicant has also failed to demonstrate the need for the proposal or to justify the waste hierarchy and proximate management of waste (requirements which are unlikely to be satisfied as described in the section on 'need' below).

Policy CS23 deals with the Sustainable Transport of Minerals and Waste and encourages the sustainable transport of minerals and waste by rail, water, conveyor, and pipelines. The proposal is not suitably located for sustainable transport.

Need and the Waste Hierarchy:

This section deals with the 'need' for wood waste management and shows that the 'need' for the proposal has not been demonstrated. There is also 'need' for the treatment of waste water and/or leachate by the proposal - and this is addressed by the submissions by Professor Lake.

Policy CS29 deals with the Need for Waste Management Development and the Movement of Waste and states:

Proposals for new waste management development or an extension of existing waste development will be permitted where they meet a demonstrated need within Cambridgeshire and Peterborough. To ensure that excessive provision is not made within the Plan area, which could result in unacceptable importation of waste, planning permission will be dependent upon applicants entering into binding restrictions on catchment area, tonnages and / or types of waste.

Permission may be granted for waste development involving the importation of waste from outside the Plan area where this is demonstrated to maximise recycling and recovery of waste materials and be the most sustainable option, taking into account the principle of self-sufficiency, the Regional Spatial Strategy, proximity to the point of waste arising, and the waste hierarchy.

Only the most superficial information on the type and quantity of waste to be incinerated at the proposed site is included within the planning application documentation and there is no assessment of proposal in relation to the waste hierarchy.

Furthermore no need for energy for waste treatment of wood waste is identified in the Cambridgeshire and Peterborough Minerals and Waste Development Plan

Core Strategy DPD (adopted in July 2011) nor in the May 2018 Waste Needs Assessment for the Cambridgeshire and Peterborough Minerals and Waste Local Plan consultation draft replacement.

It is very clear that consideration of need together with the waste hierarchy is an essential part of the assessment and determination of this application:

1) The Minerals & Waste Core Strategy Development Plan Document (Adopted July 2011). The MWCS says in order to give the Minerals and Waste Planning Authorities adequate information to be able to fully consider the proposal a planning application will need to address the list of requirements given in para 11.96 which include:

- the need for the development (in particular waste) and markets to be served
- type and quantity of waste to be deposited or handled at the site, including estimated annual throughput, and arrangements for the disposal of residues

2) The response from Public Health England to the proposed scoping opinion said "*Public Health England has provided general recommendations for scoping opinions which are attached as Appendix 5 to this report*". The comments made by PHE in that Appendix on the waste hierarchy were:

"Waste The EIA should demonstrate compliance with the waste hierarchy (e.g. respect to re-use, recycling or recovery and disposal). For wastes arising from the installation the EIA should consider: the implications and wider environmental and public health impacts of different waste disposal options disposal route(s) and transport method(s) and how potential impacts on public health will be mitigated For wastes delivered to the installation: the EIA should consider issues associated with waste delivery and acceptance procedures (including delivery of prohibited wastes) and should assess potential off-site impacts and describe their mitigation" (my emphasis)

CCC did not include and specific requirement for these issues, and especially the 'need' for the facility, the source of the arisings and the markets to be served to be addressed as part of the ES but they are fundamental to a waste application - not least because the environmental impacts can vary dramatically if, for example, the proposal was to burn wood which would otherwise be recycled or the waste had to be collected from a greater distance from the site because local arisings were insufficient to meet the demand from the incinerator.

There was inadequate detail on these issues in the original application and this was not improved in the revised application.

The proposed energy from waste plant would have a capacity of 48,000 tonnes. There is no evidence that more than a fraction of this waste would be available within the 30 mile radius proposed.

The most recent CCC Needs Assessment (May 2018) indicates that existing capacity for the treatment of non-inert wood wastes include:

- East Anglian Resources Ltd, Yard 1, Benwick Rd PE7 2HD
- Waterbeach Waste Management Park, Waterbeach

Following the extension of the East Anglian Resources site, it is envisaged the annual throughput of the site will "*increase up to 50,000 tonnes per annum*"[2].

It can be seen that the two sites cover the counties very effectively spatially.

The proposed EfW plant at Waterbeach would have excess capacity for Cambridge in any case and only around 70 per cent of the 250,000 tonnes of household and commercial waste imported to the Amey site is proposed to originate from Cambridgeshire and neighbouring counties. The remaining 30

[2] East Anglian Resources Ltd Supporting Statement Proposed extension to wood waste recycling site, erection of workshop and perimeter fencing (retrospective) Benwick Road Industrial Estate Whittlesey PE7 2HD August 2016 http://planning.cambridgeshire.gov.uk/swift/MediaTemp/41187-1950958843.pdf

percent capacity would be reserved for excess waste from other Amey plants across England.

The Application Supporting statement says:

3.0.8 The facility will accept up to 48,000 tonnes of Grades B & C wood waste per annum.

The distinction between the grades is important:

Grade B waste wood consists of[3] non-hazardous waste wood from the production of wood-based panels; for example, chipboard and medium density fibreboard.

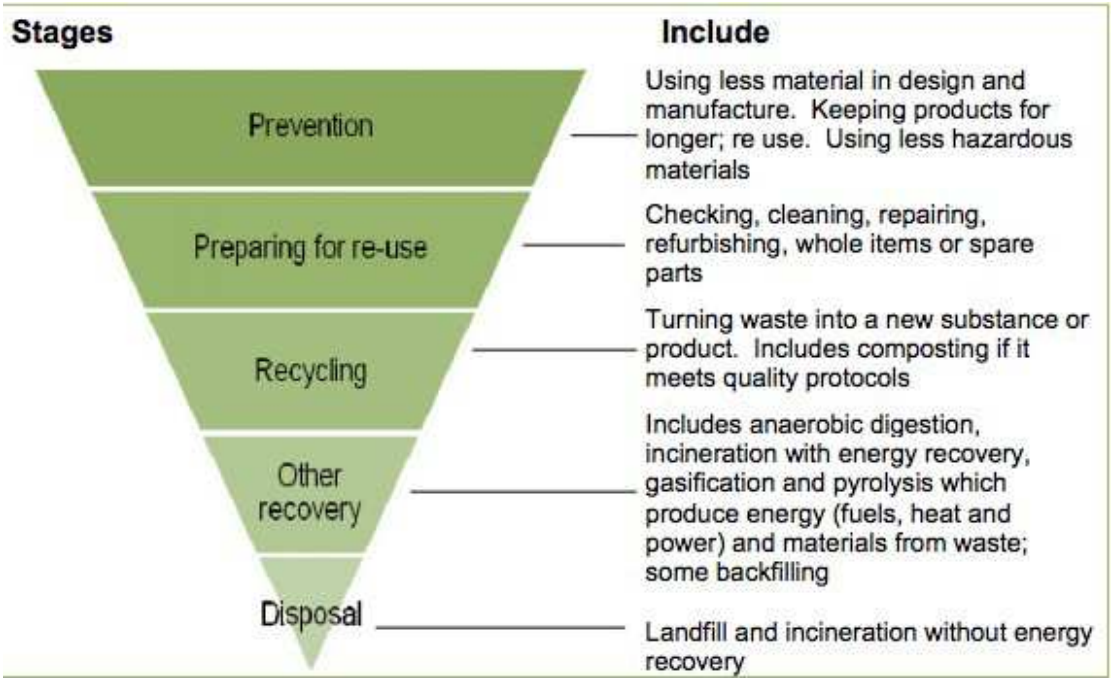
Grade C consists of[4] non-hazardous waste wood sourced mainly from construction and demolition activities, recycling centres and civic amenity sites.

The application gives no indication of the relative proportions of Grade B and Grade C wood. This is a concern because the Environment Agency confirms that Grade B wood, along with visibly clean grade C waste wood may also go to wood-based panel manufacture which is higher up the waste hierarchy than energy recovery [5]. Particular care attention must be paid to these distinctions, as application is likely to undermine the waste hierarchy.

[3] Environment Agency - Waste Wood, Quick Guide 43-17 Issued 2/3/2017

[4] Environment Agency - Waste Wood, Quick Guide 43-17 Issued 2/3/2017

[5] Environment Agency - Waste Wood, Quick Guide 43-17 Issued 2/3/2017



The waste hierarchy[6]

The importance of the waste hierarchy, grounded in Directive 2008/98/EC on waste (the Waste Framework Directive) has recently been re-affirmed by the European Commission[7] specifically in relation to wood waste:
"The Commission study found that wood waste is commonly used as a feedstock for incineration. As highlighted in the circular economy action plan, a cascading use of renewable resources such as wood, with several reuse and recycling cycles, should be encouraged where appropriate, in line with the waste hierarchy."

The SS acknowledges the status of the Waste Hierarchy in National Guidance and the responsibility of local planning authorities to ensure that it is properly implemented (para 4.1.11):

"With regards to waste, the NPPG[8] recognises the importance of moving waste up the waste hierarchy, and that this is the responsibility of both waste planning authorities and local planning authorities"

And also the role of the planning authorities emphasized in the National Planning Policy for Waste 'NPPW' (October 2014) (para 4.1.15):

"The NPPW sets out the Government's ambitions in relation to waste, and the role that planning plays in delivering these, including through delivering sustainable

[6] Defra June 2011: Guidance on applying the Waste Hierarchy

[7] European Commission COM(2017) 34 Final The role of waste-to-energy in the circular economy http://ec.europa.eu/environment/waste/waste-to-energy.pdf
[8] NPPG=National Planning Practice Guidance (6th March 2014)

development and resource efficiency by driving waste management up the waste hierarchy"

It is also a matter of fact that Waste Management Plan for England (December 2013):

"emphasises the Government's commitment to the waste hierarchy, with priority first being given to waste prevention, followed by reuse, recycling, other types of recovery (including energy recovery), and, finally to disposal"

One of the foundation principles of the Cambridgeshire and Peterborough Minerals and Waste Core Strategy Development Plan Document, as described above is:

"to determine waste planning applications in the light of the principles for sustainable waste management i.e. sustainability, self-sufficiency, proximate management of waste, and the waste hierarchy" (my emphasis).

The failure to address the waste hierarchy is therefore a significant and serious failing of the proposal.

And Policy CS18, also noted above, which relates to waste management proposals outside allocated areas, specifically requires that it can be demonstrated that proposals will contribute towards sustainable waste management, moving waste up the waste hierarchy".

The wood waste industry has a complex supply chain that involves numerous sectors, and is dependent on a number of interrelated factors. While wood consumption in the UK is well understood and recorded, there is limited data on the actual volume of annual wood waste arisings from the different sources e.g. local authority, commercial industrial and construction and demolition industries.

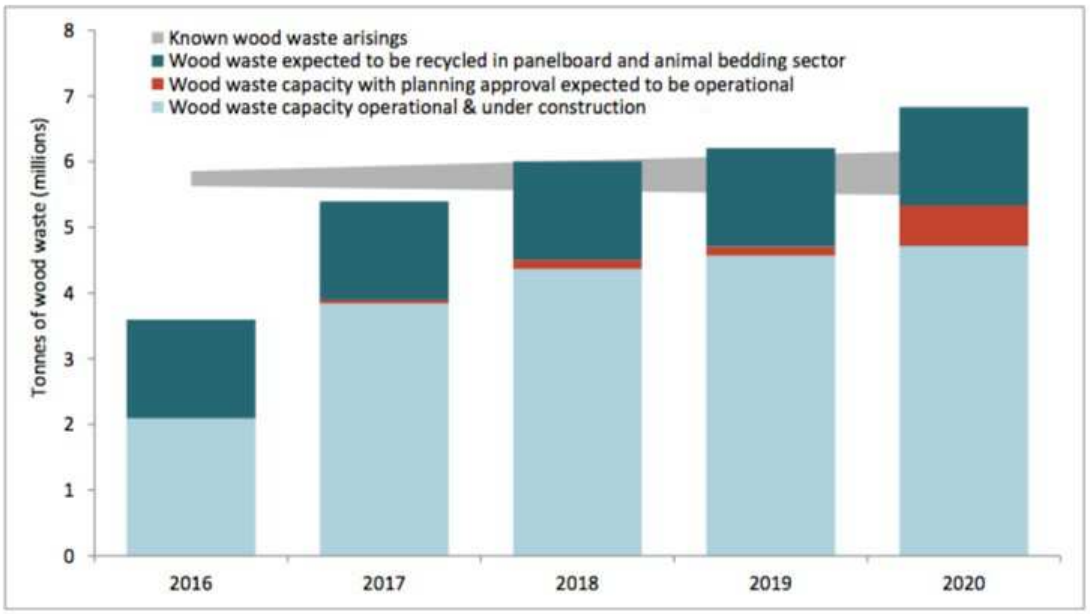
Wood wastes are being used in four primary demand sectors, namely and in the order of the waste hierarchy:
- Recycling in animal bedding;
- Recycling in panel board manufacture;
- Energy recovery in domestic wood biomass facilities;

There are also significant export markets for panel board industry (and some energy recovery) in continental Europe.

Dedicated biomass plants - both at home and abroad - have offered a growing market for recycled woodchip.

A large number of biomass plants due to take waste wood have either come online, or are expected to shortly which will very significantly increase the demand for waste wood and the capacity for energy from waste recovery of wood.

Perhaps the most comprehensive recent study on the market for waste wood is by Anthesis[9]. This shows that the capacity of energy from waste and recycling is already equal to the total tonnage of waste wood and that the capacity will exceed the supply by next year and exceed it by nearly a million tonnes by 2020:



The total energy from waste capacity over the period 2016-2020 is:

Status	Wood waste	Clean biomass	Total
Operational, and under construction for start of operation in 2017/2018	4.7	3	7.7
Planning approval received and potentially operational by 2020/21	0.8	12	12.8
Total	5.5	15	20.5

Summary of wood waste and biomass capacity in the UK (Rounded to the next Mtpa) According the Anthesis waste facility database 2016

On top of this capacity Anthesis confirms that a further 1 million tonnes of wood waste capacity has planning permission and "*might be installed in due course based on CfD, RH/ and direct CHP arrangements with energy users*".

In addition to dedicated wood energy-from-waste schemes, there is currently 1.5-2 Mtpa of multi-fuel capacity in the UK, either with a range of feedstocks or where the intended feedstock mixture ratio between residual waste, RDF and wood waste is unknown.

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[9] Anthesis, 2017. The UK wood waste to energy market An Anthesis overview of today's market, and projections for the future. Published February 2017 https://anthesisgroup.com/wp-content/uploads/2017/02/Anthesis_Wood-Waste-to-Energy-Report_February-2017.pdf

Some of the large-scale wood burning energy from waste facilities in the region are listed in Appendix 1. It can be seen that there is very significant existing local capacity. Any additional capacity is very likely to divert wastes from recycling and materials recovery contrary of the waste hierarchy.

Pre-treatment:

The SS says that "*All of the wood waste will arrive to the site pre-shredded.*" This is important because on-site shredding of wood generates high levels of noise and potentially serious dust nuisance. The SS does not, however, give any indication of where the pre-shredded wood would be sourced as it clearly requires that any supplier should have shredding capacity.

3.0.9 It is the preference of the applicant to form a partnership and sign a supply contract with Woodford Recycling Ltd to take all of the waste wood generated from the existing MRF. This is estimated to be approximately 10,000-15,000 tonnes per annum. The remaining waste wood will be sourced from Woodford Recycling Ltd from a circa 30 mile radius of the site under both short and long term contracts

Whilst there may be a '*preference'* there is no indication, and certainly no guarantee, that this supply is even available or that it has been secured and would be used in practice.

Furthermore the application does not confirm how the 10-15,000 tonnes of wood waste from the MRF would be pre-treated for the incinerator. If any additional shredding capacity was needed at either the MRF or this proposed facility then there would undoubtedly be a significant increase in noise and dust from the site - a serious issue on which the ES is silent.

Visual Impacts of the Proposal:

The site is a sensitive one (as noted in Puddock Hill allocation) with three properties within 200m. The Landscape and Visual Impact Assessment indicates that:

8.2.3 Three of the viewpoints, the closest to the site are considered to experience a moderate adverse impacts initially.

The assessments are for impacts from those residential dwellings in close proximity to the development. While these impacts might be mitigated over time with a carefully designed planting scheme they will inevitably detract from the openness of the current views - and planting on and around old landfill and waste sites is often difficult to implement and ineffective in practice. This is likely to be a particular problem at Warboys with the notably high gas emission rates, the increased loading of volatile organic compounds from the proposed evaporator and the long-term groundwater contamination/leachate problems associated with the site.

It is considered that the impact of the combustor stack, which breaks the skyline of the ridge and is an incongruous and intrusive industrial element in an otherwise largely rural landscape has been underestimated by the applicant.

Fire Prevention Plan

Para 3.0.10 of the SS indicates that the wood waste storage would be in "*7 no.SS tonne open air storage bays*" - a total of 385 tonnes of wood. The capacity of each bay is marked on the drawing as 187.5m3 (consistent with the density of unscreened chip[10])

The maximum height of storage in the bays needs to be restricted to 3m to ensure that the walls operate as fire barriers.

The guidance on Fire Prevention Plans requires[11] "*a separation distance of at least 6 metres between waste piles and the site perimeter, any buildings, or other combustible or flammable materials*". It is clear from the site drawings that the bays extend to the boundary of the site and do not provide a 6m separation distance[12].

The supporting statement indicates that:

3.0.31 The Fire Water tank will be 10m long and Sm wide, and dark grey in colour.

The third dimension does not appear to be confirmed in the application but the capacity is marked on the drawing as 225 m^3 (which indicates that the depth of the tank would be c.4.5 m). This is likely to be inadequate because the FPP[13] says:

"You'll need a water supply of at least 2,000 litres a minute for a minimum of 3 hours for a 300 cubic metre pile of combustible material."

This would require a total of 120m^3/hr and thus 360m^3 for the three hours minimum operation. This exceeds the current tank capacity by 60%. The capacity of the incoming water supply is therefore an important consideration to ensure compliance with Policy CS8.

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[10] Environment Agency - Waste Wood, Quick Guide 43-17 Issued 2/3/2017

[11] https://www.gov.uk/government/publications/fire-prevention-plans-environmental-permits/fire-prevention-plans-environmental-permits#manage-waste-piles

[12] Note, however, that there is ambiguity in the fire prevention plan about whether this minimum distance at the boundary can be reduced with adequate fire protection barriers as is allowed between piles.

[13] https://www.gov.uk/government/publications/fire-prevention-plans-environmental-permits/fire-prevention-plans-environmental-permits#manage-waste-piles

Conclusions:

It is concluded that the application is not consistent with the development plan and that it follows there is a need for the applicants to justify the need for the application and to demonstrate consistency with the waste hierarchy. They have not done so and there is a serious risk that the application would mean over-provision of capacity low in the waste hierarchy which would undermine material recovery/recycling, particularly of Grade B wood and/or increase transport distances unreasonably.

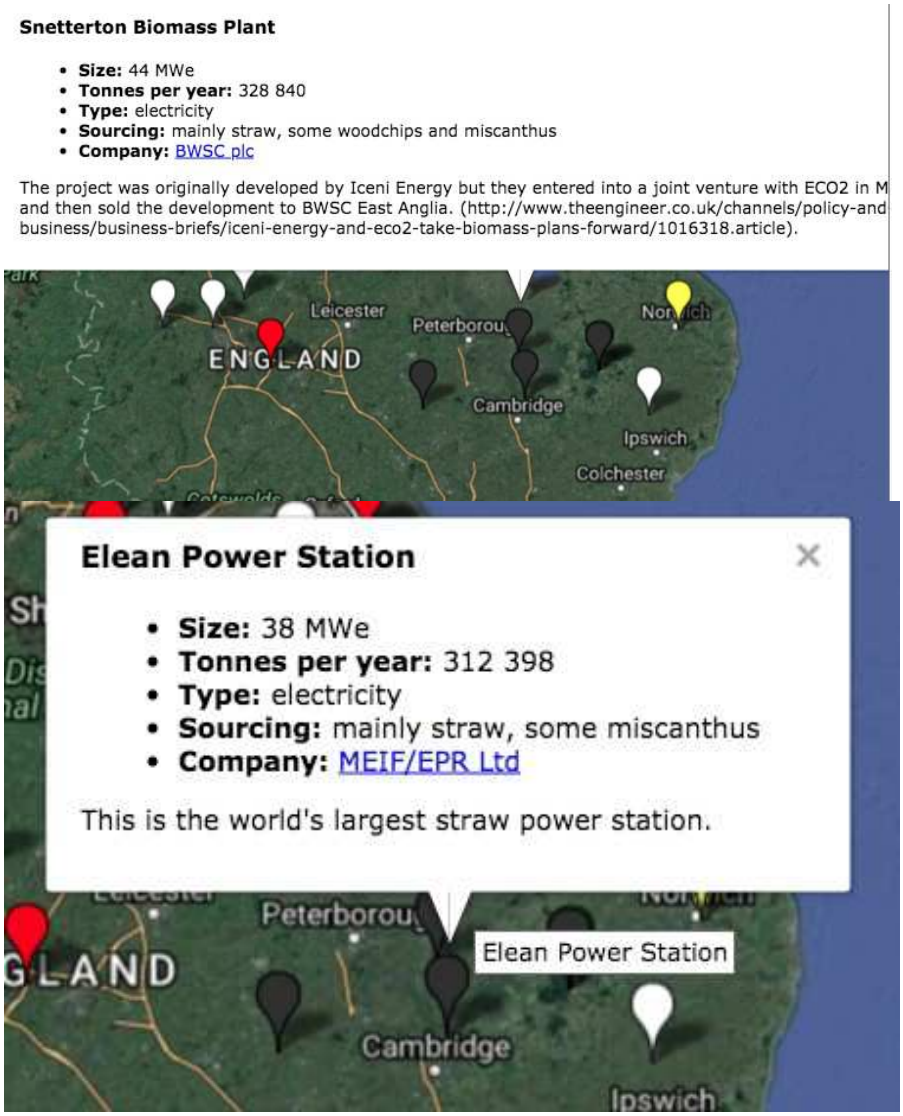
I trust that the comments and objections raised above are clear and helpful. Please do not hesitate to contact me if you require further information or clarification.

Yours sincerely,

Alan Watson C.Eng

Appendix 1

Existing large scale nearby EfW facilities taking wood waste:



Thetford Power Station

- **Size:** 41.5 MWe
- **Tonnes per year:** 457,000
- **Type:** electricity
- **Sourcing:** mainly animal bedding, some wood
- **Company:** MEIF/EPR Ltd

Goosey Lodge Biomass Plant

- **Size:** 16 MWe
- **Tonnes per year:** 84,489
- **Type:** electricity
- **Sourcing:** waste wood, meal and bone meal
- **Company:** Wykes Engineering Co.(Rushden) Ltd.

This is a biomass and bioliquid plant (see Biofuel power plant map for bioliquids details)

- **Size:** 4.5 MWe
- **Tonnes per year:** 49,000
- **Technology:** pyrolysis
- **Sourcing:** waste wood + C&I waste
- **Company:** Energy 10

Planning consent for an ACT plant was previously granted in 2007 but the scheme was abandone
then involved (Pure Power Energy), which is now in liquidation.

Mendlesham Renewable Energy Plant

- **Size:** 40 MWe
- **Tonnes per year:** 328 840
- **Type:** electricity
- **Sourcing:** straw and wood
- **Company:** Eco2 Biomass

http://www.planningresource.co.uk/news/1192183/developer-considers-appeal-
http://www.eadt.co.uk/business/farming/mendlesham_biomass_battle_hots_up