

Local Development Order Statement of Conformity

Units A3 and A4 Marston Gate, South Marston Business Park, Swindon

For: Go Green Fuels Ltd

CRM.057.005.PL.R.001.A



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Go Green Fuels Ltd Biomethane demonstration facility

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1 INTRODUCTION

1.1 Introduction

1.1.1 This statement demonstrates conformity of a development of a biomethane demonstration plant to be carried out by Go Green Fuels Ltd within the South Marston Industrial Estate, Swindon, under Swindon Borough Council's adopted Local Development Order.

1.1.2 The development complies with the Local Development Order, and this statement seeks to confirm this and provide additional information relevant to the development.

1.1.3 The statement will provide the following information:

- Background to the proposed development;
- The location of the development site;
- Consideration of how the development is compliant with the LDO;
- Consideration of environmental impacts;
- A conclusion.

2 LDO DEVELOPMENT

2.1 Introduction

- 2.1.1 This section provides details of the development permitted under the LDO. The development site is located at Units A3 & A4 Marston Gate, South Marston Business Park, Stirling Road, Swindon, SN3 4DE.
- 2.1.2 The development is a biomethane demonstration facility which will involve the utilisation of proven gasification technology to produce biomethane from waste, for use in vehicles and to feed into the gas grid.
- 2.1.3 The fuel for the plant would be derived from residual waste from local homes and businesses in the form of SRF/RDF bales. Waste wood will also provide fuel for the plant. The total amount of waste imported to the facility would not exceed 12,500 tonnes per annum.
- 2.1.4 The development, including the storage of SRF/RDF and wood will take place within the existing building and immediately outside where external plant and equipment will be located. Air blast coolers and fire water and gas storage will be situated across the road to the south-east of the main building (see site layout P169-MG-15111100 B).

2.2 On site activities and processes

- 2.2.1 The development will make use of a well-established and relatively low-risk technology, which is already used within the industrial estate on a smaller scale.
- 2.2.2 Prepared SRF/RDF bales and wood will be delivered into the existing building on 20 tonne trucks. Deliveries will take place between 0700-2200 Monday to Friday, and 0930-1700 on Sunday, and there will be approximately 1 vehicle movement per hour associated with the facility for waste delivery, transport of product and all other purposes.
- 2.2.3 Once onsite, the SRF/RDF and wood will form feedstock for the Gasplasma[®] process. Syngas production will convert the waste into a syngas through the Gasplasma[®] process. This includes cooling, cleaning and conditioning of the syngas.
- 2.2.4 The syngas will then be processed further for use as a transport fuel or for injection into the grid. This is achieved by polishing the syngas to remove catalyst poisons; a water gas shift reaction; further polishing; a methanation stage; and a purification stage for removal of CO₂ to ensure that the compressed biomethane complies with the specification for use in transport, as

well as the primary requirement for grid export. The CO₂ removed at this stage will be compressed and stored in tanks for transport offsite, for use as an industrial gas.

- 2.2.5 The final stage is to analyse gas quality to ensure it meets relevant specifications, and then prepare the refined CBM for both direct supply as transport fuel and for export to the grid. For direct supply as transport fuel, the CBM would be compressed to 250barg and stored onsite in racks. The bottles will be exported from the site in HGVs, and used as fuel by local hauliers.
- 2.2.6 For export to grid, the gas is further upgraded before final testing and metering onto the local gas grid. Non-compliant gas will be sent to the flare.

2.3 Site layout

- 2.3.1 The site layout is shown in drawing P169-MG-15111100 B. The majority of processing will take place within units A3 and A4. There will be some plant and equipment situated outside, adjacent to these units, as shown in the layout drawing.
- 2.3.2 Due to the size constraints of the site, a piece of land across the road to the east of the site will be utilised for storage purposes. This area is not currently designated for any specific use, and an agreement has been reached with the land owner allowing Go Green Fuels Ltd to use this land. The land has previously been used for car parking, however it was never designated for this use, and is no longer used for car parking. The land is currently used for storage. However it is now surplus to requirements, and is no longer required for this purpose.
- 2.3.3 This piece of land will be used for CO₂ storage tanks, liquid propane storage tanks, a liquid argon tank, liquid oxygen storage, a water treatment tank and a fire water tank. All materials will be stored in line with the Environmental Permit covering the entire site, and will be monitored by the Environmental Agency.
- 2.3.4 As part of the development of this area, a small amount of landscaping including a number of trees will be removed. The amount of landscaping and trees removed will be kept to a minimum, and no trees affected are protected by a TPO.
- 2.3.5 This piece of land will be accessed by vehicles reversing into the site. No other vehicles use this piece of road as the road only leads to the development site. Therefore access to the site will not impact any other road users.

2.4 Justification for the proposed development

2.4.1 The proposed development has been selected and partially funded by the Department of Transport as part of a competition with the aim of reducing carbon emissions from transport.

2.4.2 The development will be the first of its kind in the world, and will provide a pioneering technology to power heavy goods vehicles using household and business waste, with the potential of cutting carbon emissions significantly. Although the technology involved is well-established, the product has not been used in this way before.

2.4.3 The development provides economic, environmental and social benefits, and therefore represents sustainable development as defined within the NPPF.

2.5 Hours of construction and operation

2.5.1 During construction, all works including construction, development and delivery of construction materials will take place between 0700 to 1900 hours Monday to Sunday.

2.5.2 During both commissioning and operation, the receipt and removal of waste/ recyclable material will take place between 0700-2200 hours Monday to Saturday, and 0930-1700 hours on Sunday and Public Holidays. Plant operation, handling and processing of waste will take place 24 hours per day, 7 days a week, 52 weeks of the year.

2.6 Employment

2.6.1 During the two year design and construction of the facility an average of 50 skilled people will be employed directly with another 100 people working in the supply chain around the UK.

2.6.2 Once it is operating the plant will employ 20 highly skilled engineers and plant operatives on a full time basis. As far as is possible these will be recruited locally.

2.6.3 The plant will act as a showcase for the Gasplasma[®] technology developed by Advanced Plasma Power Ltd, a firm based in Swindon. The successful operation of the facility will lead to order for further plants resulting in additional new jobs.

2.7 Environmental Impact Assessment (EIA)

2.7.1 As part of the early planning processes, the development was screened to identify whether or not it constituted EIA. It was confirmed by the Local Planning Authority at this point that the development did not constitute EIA (see Appendix 1)

3 THE DEVELOPMENT SITE

3.1 Site Location

- 3.1.1 The proposed development site is an approximately 0.3 hectares, within the approximately 95 hectare South Marston industrial estate.
- 3.1.2 The site lies within the South Marston Industrial Estate LDO order (see appendix 2), and is situated towards the south-west of the LDO site, entirely within the area designated as having relaxed planning controls.
- 3.1.3 The proposed application site consists of an operational building and an external yard area. The existing building will be utilised as part of the development, and complemented by additional plant and equipment both internally and externally. A small area of land to the south-east of the existing building- across the road- will be used for the air blast cooler and for storage.

3.2 Existing Site Activities

- 3.2.1 The applicant is currently based in a building adjacent to the proposed development site, and the existing site makes use of the same technology and activities as those proposed. The only difference between the existing development and the proposed development is the scale of the activity.
- 3.2.2 Based on the above, it is considered that the proposed development is consistent with activities already taking place within the industrial estate, and will therefore be in keeping with the site's context and surroundings.

3.2.3 Surrounding Activities

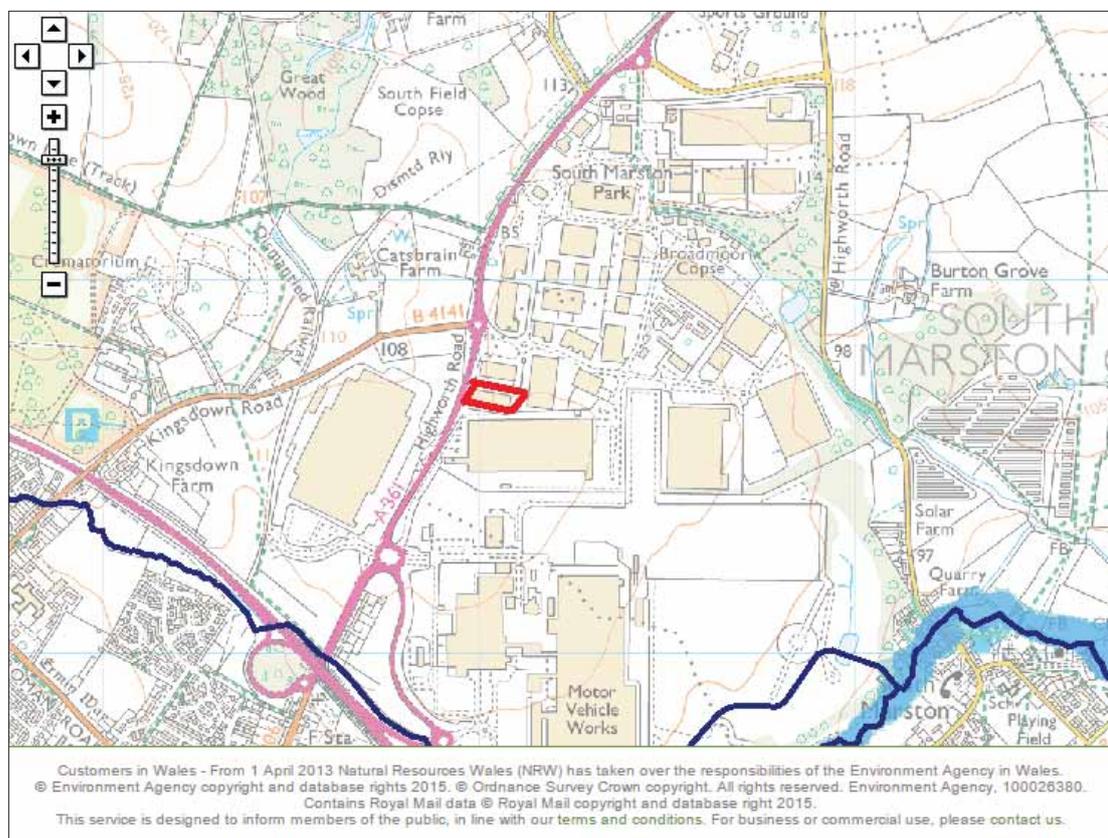
- 3.2.4 The site is located within a well-established industrial estate, which supports a range of activities including storage warehouses, tool manufacturing, vehicle suppliers and distribution warehouses.
- 3.2.5 To the north of the site is a warehouse building where the existing site is located. To the east is a road leading to the proposed site, and beyond this a furniture factory. To the west is a strip of vegetation, and beyond this the A361. To the south is a large warehouse building.

3.3 Site Access

- 3.3.1 Access to the site will be as at present, from the east of the industrial estate off the A361. Once on Stirling Road vehicles will turn right at the existing roundabout and enter the existing area of hardstanding to deliver the SRF/ RDF and export the bio-methane and CO₂.
- 3.3.2 The existing area of hardstanding provides sufficient space for vehicles to enter and exit the site safely, without affecting other road users.
- 3.3.3 To access the land to the east of the main site, vehicles will reverse into the site. The road leading to this site does not provide access to any other units, and is therefore only used by vehicles accessing the site. Therefore vehicles entering the site will not have a negative impact upon other road users.
- 3.3.4 Further details regarding transport and access are included within the Transport Technical Note accompanying this submission.

3.4 Flood risk

- 3.4.1 The proposed site is within Flood Zone 1 representing a 0.1% chance of flooding in any given year. There is no area of Flood Zone 2 or 3 within the vicinity of the site. As no additional hardstanding will be laid and there will be no change to site drainage, the proposed development will not affect flood risk at the site.



4 COMPLIANCE WITH THE LDO

4.1 Introduction

4.1.1 This section considers the proposed development in the context of the LDO, and demonstrates that the development is compliant with all aspects of the LDO.

4.1.2 The table below sets out how the development is compliant with each aspect of the LDO.



Table 1. Comparison of the development against the LDO.

Local Development Order requirements	How the proposed application meets the LDO
<p style="text-align: center;">Conditions Controlling the Parameters of the LDO</p> <p>The following types of development are permitted within the LDO:</p> <ul style="list-style-type: none"> • Building extensions and alterations (including mezzanines) within Class B2 (General Industry) or B8 (Storage or Distribution) use up to a maximum of 1200 sqm (gross internal area), and provided that the extension does not increase the gross internal area floorspace of the “original building” by more than 50% • The installation, alteration or replacement of apparatus, equipment or machinery directly associated with the operational needs of the business (subject to control measures in the “noise protection area” and on building facades facing onto the “noise protection area”) • New building openings • The reconfiguration of the site layout, subject to changes not impacting on the site access. 	<p>The proposed development involves the provision of new plant and equipment, both within an existing building and external to the building. The plant and equipment would replace existing plant and equipment from an adjacent building.</p> <p>The development does not involve any additional floorspace, and the net increase in plant and equipment is minor.</p> <p>The proposed development would fall within Class Use B2 (General Industrial).</p> <p>The proposed development would include a minor reconfiguration of the site layout and potentially new building openings so that the development fits within the site area and is fit for purpose. However site access would not be impacted as part of the development.</p> <p>Based on the above, the proposal falls within the type of development permitted within the LDO, specifically ‘The installation, alteration or replacement of apparatus, equipment or machinery directly associated with the operational needs of the business...’</p>
<p>‘The LDO is confined to the parts of South Marston Industrial Estate identified as areas of relaxed planning controls on the LDO Zoning Map.’</p>	<p>The full extent of the proposed development is located within the LDO Zoning Map shown within the ‘LDO and Statement of Reasons’ document.</p>
<p>‘The LDO is active until 14th January 2021. Development which has started under the provision of the LDO before this date can be completed following the expiry of the LDO.’</p>	<p>Based on the current timeframe, the development would start in 2016. Therefore it would start well within the active time-frame of the LDO.</p>
<p>To take advantage of the LDO, a Self-Certification Form is required for any of the following:</p> <ul style="list-style-type: none"> • ‘You are seeking to create new building(s) or building extension(s); • Your development would lead to a loss of parking spaces; • Your development lies in a “noise protection area” or • Your development would lead to a change in drainage arrangements. 	<p>The development involves the provision of plant and equipment. There will be no new buildings created as part of the application, and no extensions to existing buildings.</p> <p>The development would not result in a loss area used of car parking, and is not within a ‘noise protection area’. Furthermore, the development would not lead to a change in drainage as it would take place within an area of existing hardstanding.</p> <p>There are no drainage collection points inside the building. Given the pre-processed nature of the SRF /RDF materials, combined with the small quantities to be stored on</p>

Local Development Order requirements	How the proposed application meets the LDO
	<p>site for a short time period, it is not expected that there will be leachate from the RDF.</p> <p>Effluent from the process is expected to be contained and tankered off site.</p>

Local Development Order requirements	How the proposed application meets the LDO
<p>evaluate a risk assessment which incorporates specific remedial measures to deal with any land contamination.</p> <p>Prior to the commencement of development which has the potential to effect land contamination at the site, an investigation and risk assessment must be completed in accordance with a scheme to assess the nature and extent of any contamination on the site. The details of the scheme are subject to the approval in writing of the Local Planning Authority. A written report of the findings must be produced.</p> <p>If you are in any doubt, please seek the advice of the Contaminated Land Officer on whether a contaminated land site investigation is needed.</p> <p>If the findings of the investigation and risk assessment indicate that remediation will be required then, prior to the commencement of the development a detailed remediation scheme to bring the site to a condition suitable for the intended use must be prepared, and is subject to the approval in writing of the Local Planning Authority. The scheme must include all works to be undertaken, proposed remediation objectives, remediation criteria and timetable of works. The scheme must ensure that the site will not qualify as contaminated land under Part 2A of the Environmental Protection Act 1990 in relation to the intended use of the land after remediation.</p> <p>An approved remediation scheme prepared in this way must be carried out in accordance with the agreed details prior to the commencement of development. Following completion of measures identified in the approved remediation scheme, a verification report that demonstrates the effectiveness of the remediation carried out must be produced submitted to the Local Planning Authority for its approval in writing.</p> <p>If, during the course of development, any contamination is found which has not been identified in the site investigation, additional measures for the remediation of this contamination shall be submitted to and approved in writing by the local planning authority. The remediation of the site shall incorporate the approved additional measures.'</p>	<p>Piled foundations will be required as part of the development. A piling risk assessment will be carried out prior to any development.</p> <p>The risk of the proposed development affecting land contamination at the site is considered to be low, but will be confirmed through a piling risk assessment.</p> <p>Furthermore, the proposed development involves activities that already take place within the site. The project would involve the same technology and processing activities but at a greater scale within an existing building. Given that the existing activities have not created contamination concerns, it is highly unlikely that the proposed development will.</p>

Local Development Order requirements	How the proposed application meets the LDO
<p>Piling Condition</p> <p>'Piling or any other foundation designs using penetrative methods shall only be permitted with the express written consent of the Local Planning Authority, which will only be given for those parts of the site where it has been demonstrated that there is no resultant unacceptable risk to groundwater quality. The development shall be carried out in accordance with the approved details.'</p>	<p>The proposed development involves the construction of plant and equipment both within an existing building and external to the building on existing hardstanding.</p> <p>Piled foundations will be required to support the plant and equipment. A piling risk assessment will be carried out prior to any development.</p>
<p>Conditions Controlling</p> <p>'Individual developments wishing to take advantage of this LDO will be screened by the Local Planning Authority as part of the self-certification process. Any developments which require an individual Environmental Impact Assessment (EIA) would need to be assessed through a formal planning application as such developments would fall outside the scope of this LDO.'</p>	<p>Potential EIA Development</p> <p>The proposed development falls below the Schedule 2 threshold as it is an 'industrial installation for the production of electricity, steam and hot water' of less than 0.5 ha in size.</p>
<p>The following are outside of the scope of the LDO:</p> <ol style="list-style-type: none"> 1. 'Development involving a process designated as a 'scheduled process' for the purpose of air pollution control; 2. Development involving discharges to water which require the consent of the Environment Agency; 3. Development involving an installation which would give rise to the presence of environmentally significant quantities of potentially hazardous or polluting substances; 4. Development involving a process which would give rise to radioactive or other hazardous waste; 5. Development that would fall under Council Directive 96182/EC on the control of major accident hazards involving dangerous substances (COMAH).' 	<ol style="list-style-type: none"> 1. The development is not designated as a 'scheduled process' for the purpose of air pollution control. 2. Effluent will be tankered off the site. Go Green Fuels Ltd will NOT be discharging into water courses so should not need EA consent. 3. There will be a small amount of Air Pollution Control Residue (APCR), which is classed as a hazardous waste. The quantity will be of the order of 35kg/hr. In terms of development giving rise to environmentally significant quantities of potentially hazardous or polluting substances, the development will only accept baled SRF/RDF in small quantities. This will be processed within five days of delivery. The source of SRF/RDF will be monitored to ensure the type of waste received is suitable. The site will be regulated by an Environmental Permit, which will ensure all material is stored appropriately on site. 4. There will be no radioactive or hazardous waste associated with the application. 5. The plant will not fall under COMAH. The COMAH threshold for methane is 50tonnes. The most to be stored on site is 15 tonnes.
<p>'Development shall not commence until a drainage strategy detailing any on and/or off site drainage works, has been submitted to and approved by, the local planning authority in consultation with the sewerage undertaker. The</p>	<p>The proposed development involves the provision of plant and equipment on existing hardstanding. No additional hardstanding will be created as part of this application.</p>

Local Development Order requirements	How the proposed application meets the LDO
<p>drainage strategy should strive to utilise sustainable drainage techniques in accordance with the SuDS management train (Ciria C609). No additional discharge of foul or surface water from the site shall be accepted into the public system until the drainage works referred to in the strategy have been completed.</p> <p>With respect to smaller developments and developments that will not result in a change in drainage requirements a drainage strategy will not be required. Please seek the advice of the Local Planning Authority on whether your scheme generates a need for a drainage strategy.</p>	<p>Therefore, the development will not require any alterations to the existing drainage arrangements.</p> <p>It is not anticipated that additional drainage features will be required. There should be no or minimal leachate from the baled SRF/RDF.</p>
Condition Controlling Light in the 'Noise Protection Area'	'Noise Protection Area'
<p>'No part of the "noise protection area" nor any building erected thereon shall be floodlit or otherwise externally illuminated except in accordance with details that have first been submitted to and approved in writing by the Local Planning Authority. Any flood lighting shall be implemented and retained in accordance with the approved details.'</p>	<p>The proposed development is not within the 'noise protection area' of the site. Therefore this condition is not applicable to the proposed development.</p>
Noise Conditions	Noise Conditions
<p>'In the "noise protection area" identified on the Zoning Map, for proposals involving external storage activities, plant or machinery, manufacturer's noise emissions data should be submitted. The Council will need to be satisfied that the proposals in the "noise protection area" would not generate noise levels of 55dB or higher at nearby residential premises. Care should be taken that individual noise events do not exceed 65dB at the boundary of the site between the hours of 23:00 to 07:00. Should there be a likelihood of breaching this level an acoustic assessment may be necessary with consequent mitigation suggested and implemented to the satisfaction of the Local Planning Authority.'</p> <p>'With the exception of necessary audible hazard or warning systems, no development on the site shall have external loud speaker or sound systems except in accordance with details that have first been submitted to and agreed in writing by the Local Planning Authority.'</p>	<p>The proposed development site is outside of the 'noise protection area' as shown on the Zone Map. Therefore conditions relevant to developments within the 'noise protection area' are not applicable to this development.</p> <p>The proposed development would not involve any external loud speakers or sound systems. Therefore this condition is not applicable to the proposed development.</p>
Archaeology Mitigation Condition	Archaeology Mitigation Condition
<p>'No development shall take place within any areas that have not been previously developed until;</p>	<p>The proposed development involves the provision of new plant and equipment within an area of existing hardstanding. No new hardstanding will be laid as part of the application.</p>

Local Development Order requirements	How the proposed application meets the LDO
<p>a) A written programme of archaeological investigation, which should include on-site work and off-site work such as the analysis, publishing and archiving of the results, has been submitted to and approved by the Local Planning Authority; and</p> <p>b) The approved programme of archaeological work has been carried out in accordance with the approved details.'</p>	<p>Based on the above, this condition is not applicable as there will be no development within any areas that have not previously been developed.</p>
<p>Management of Traffic Generation Conditions</p> <p>'A Transport Assessment in accordance with "Guidance on Transport Assessment" (DfT, 2007) will be required for any development that provides for net additional floorspace that exceeds the following thresholds:</p> <ul style="list-style-type: none"> B1 Business = 2,500m² B2 General Industry = 4,000m² B8 Storage or Distribution = 5,000m² <p>The Transport Assessment shall be submitted to and agreed in writing with the Local Planning Authority. The development shall be completed in accordance with the details included within the Transport Assessment including any mitigation measures required. As a result of the Transport Assessment, developments may be required to provide off-site transport mitigation measures delivered through an agreement under Section 278 of The Highways Act 1980 or a Section 106 Legal Agreement.'</p>	<p>The proposed development involves the provision of plant and equipment located within and externally to an existing building. There is no increase in floor space as part of the application.</p> <p>Therefore the proposed development does not exceed the thresholds for a Transport Assessment to be required.</p> <p>Furthermore, the traffic resulting from the proposed development will be entirely within the predicted traffic generation for the existing industrial buildings permitted as part of the development of the industrial estate.</p> <p>Please see the Transport Technical Note for further information.</p>

5 ASSESSMENT OF ENVIRONMENTAL IMPACTS

5.1 Introduction

- 5.1.1 This section considers the environmental impacts of the proposed biomethane demonstration facility, and confirms that there will be no significant negative environmental impacts as a result of the development.

5.2 Transport

- 5.2.1 A Transportation Technical Note has been prepared and submitted alongside this statement. The note identifies that there will be approximately 1 vehicle movement per hour associated with the development. The vehicle movements are entirely consistent with the existing HGV traffic movements at the site, and are very low for a B2/B8 industrial unit of this size within the South Marston Industrial Estate.
- 5.2.2 The site is served well by both public transport and cycle infrastructure. Therefore staff and visitors would have the opportunity to access the site using a method of transport other than private car.
- 5.2.3 Overall, the Transportation Technical Note concludes that there are no highway concerns associated with this site.

5.3 Noise

- 5.3.1 A noise assessment was prepared to assess the noise impacts of the proposed facility on the closest noise sensitive receptors. Due to the industrial estate location of the facility, sensitive residential receptors are relatively well removed.
- 5.3.2 A baseline noise survey was carried out to quantify the existing baseline and ambient noise climate of the area. Noise levels were quantified during both the weekday and weekend periods. A noise assessment was then produced to identify the potential noise impact at the nearest noise sensitive premises as a result of the operation of the proposed development.
- 5.3.3 The noise assessment confirms that the proposed development would not result in a significant impact in terms of noise, and typically expected noise emissions are below the existing background noise levels as measured at the nearest noise receptors.

5.4 Air Quality and Odour

- 5.4.1 The only emission associated with the plant will be CO₂. CO₂ is screened out of air quality assessments, and therefore an air quality assessment is not required as part of the development.
- 5.4.2 RDF imported into the site will be baled and wrapped, and stored for up to five days. The vast majority of RDF material will be plastics, and therefore will have minimal odour. During processing, each bale will be exposed for up to one hour within a conveyor system. Therefore, there will be no significant odour associated with the facility.

5.5 **Geo-environmental**

- 5.5.1 The development involves the instillation of plant and equipment on existing hardstanding, and therefore piled foundations will be required as part of the development. Prior to any development taking place, a piling risk assessment will be undertaken. This will identify any risk of contamination associated with the development.
- 5.5.2 If any risk of contamination is identified, remediation measures will be put in place to ensure no contamination occurs.

6 CONCLUSION AND SUMMARY

6.1 Conclusion

- 6.1.1 This statement supports a development permitted through the Local Development Order, for a bio-methane plant within the South Marston Industrial Estate, Swindon.
- 6.1.2 The development complies with all of requirements under the Local Development Order, and this is confirmed within this statement. Furthermore, this statement confirms that there will be no significant environmental impacts associated with the development.

Appendix 1: EIA screening opinion

**Service
Delivery
Planning**

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Please ask for: Jane Rodens
Direct Dial No: 01793 466365
Email: jrodens@swindon.gov.uk
Our Ref: S/EIA/15/0809
Date: 22nd June 2015

Dear Sir/Madam,

Re: EIA Screening application S/EIA/15/0809 – Development of a Plasma Power Unit

At: B2, Viscount Way, South Marston, Swindon, SN3 4DE

I refer to your letter dated 15th May 2015 seeking a Screening Opinion to establish whether an Environmental Impact Assessment (EIA) is required in respect of the above proposed development.

After carefully considering the information contained in your letter and the attached plans, having regard to the relevant provisions of the Town and Country Planning (Environmental Impact Assessment) Regulations 2011 ("the Regulations") and subsequent 2015 amendment. The Local Planning Authority considers that the proposed development is not EIA development. The responses to the consultation, justification and reasons are set out below.

During the EIA screening process the following have been consulted:

- Natural England,
- Environment Agency,
- Local Highways Authority,
- Swindon Borough Council Environmental Protection

There have been the following responses received:

Natural England

They can confirm that the application site is not located within, adjacent to or in close proximity to any Site of Special Scientific Interest (SSSI) or Special Area of Conservation (SAC), Special Protection Area (SPA) or Ramsar Site and is not likely to significantly affect the interest features for which they are

notified. The location of the proposal is not within, nor is it sufficiently close to a National Park, Area of Outstanding Natural Beauty or Heritage Coast to impact upon the purposes for which these sites are designated.

Environment Agency

No comments received

Local Highways Authority

In this case, based on the details supplied, a formal Transport Assessment is not required. However, a detailed Transport Statement will be required to accompany any formal planning application.

Swindon Borough Council Environmental Protection

The specific concerns that would be raised with regards to this proposal relate to:

Noise – Additional information would be required on the plant noise associated with the incineration, the exhaust from drying RDF and, the flare stack. Based on the response of the applicant all of this is external apparatus would not be enclosed for insulation.

Air quality – There is not much information in the way of combustion products. There will be a requirement relating to stack height for both the flare stack and the RDF drying exhaust. Due to its location an assessment of air quality will be required, the proposed operation is within an industrial area. There are other significant industrial processes emitting, and this would need to be taken into account. The assessment would be used to inform the calculation of chimney heights.

Odour – This would not be covered by any environmental permit, more information would need to be provided regarding the external apparatus.

Storage of waste and product – Where is this to be stored/how?

It is very likely that a permit will be needed because waste is being stored, processed and burnt. Presently subject to a permit overseen by the Environment Agency. What is the capacity of the use and is there any scope/future requirement for intensification of operations?

The proposal is now to be assessed under the EIA regulations and in regards of the requirements that fall under the respective schedules.

Schedule 1

Under Schedule 1 the development is not classified.

Schedule 2

Under Schedule 2 the development is classed under section 3 as Energy Industry, section a), which states:

Industrial installations for the production of electricity, steam and hot water (unless included in Schedule 1);

Under schedule 2 criteria and threshold it states that the area of the development exceeds 0.5 hectare. The proposal is to be 0.3 hectares therefore the proposal is under the criteria.

The indicative criteria and threshold states under column 3 states that; *the thermal output of more than 50 MW. Small stations using novel forms of generation should be considered carefully.* Within the additional information that has been requested states that the thermal input to the process is approximately 5MW the output in compressed gas will be less than 3MW. This will therefore be under the requirements. It has also been indicated that this is not a novel form of energy generation and there are other power plants of this type.

The key issues to consider under column 4 are; *Level of emissions to air, arrangements for the transport of fuel and any visual impact.* During the use of the proposal there is to be lorry movements to and from the unit, due to the location of the proposal it is considered that this would have minimal impact on the industrial estate but additional information in the form of a Transport Statement would be required. There is to be a flare on the building to release emissions, it has not been indicated where this is going to be and the size. Additional information would need to be submitted alongside an air quality report. There are to be no other external changes on the unit. From the comments received from Environmental Protection it is considered that there would be an impact on the surrounding area but due to the distance of the dwellings and other units it is considered that there would be a minimal impact. Additional information would need to be submitted to ensure that there is minimal impact on the amenity of the neighbouring properties.

Characteristics of development

- the size of the development;

The size of the proposed development is under the criterion set out in the EIA regulations schedule 2.

- the accumulation with other development;

On the rest of the industrial estate there are other units that also produce emissions. There are no other development that are granted or waiting for permission that would be considered to have a cumulative impact along with this proposal.

- the use of natural resources;

The resources that are to be used indicated in the supporting information are considered to be waste products and therefore would have minimal impact on the availability of current natural resources.

- the production of waste;

There is to be waste produced in the form of 100kg/h of Plasmorok and 50kg/hr of hazardous waste. The thermal output from the proposal site would also be less than the recommended threshold within Schedule 2 of 50MW. It is considered that this is would be less than the requirements within the EIA regulations. To ensure that the storage and disposal of waste and hazardous material is conducted in a safe manner

additional information and permits would need to be ascertained from the Environment Agency.

- pollution and nuisances;

It is considered on the information that has been supplied that this development would not be classed as EIA but in the full planning permission an Air quality assessment would be required.

- the risk of accidents, having regard in particular to substances or technologies used.

It is stated in the information submitted that there is a low risk of injury. Due to the small scale of the proposal it is considered that there would be minimal impact. In a full planning permission additional information would be required to ensure that any waste is stored in an appropriate location.

Sensitive area and location of development

The proposal is not located within or near a sensitive area, this has been confirmed through the consultation with Natural England.

Conclusion

It is considered in that the proposal as it stands with the information that has been provided in the application and the additional information, is not EIA development. If there is to be further expansion of the proposal and the amount/type of material is to be produced then it may become EIA development.

Yours sincerely



Jane Rodens
Planner



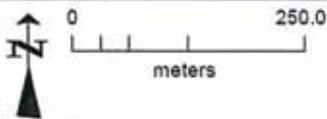
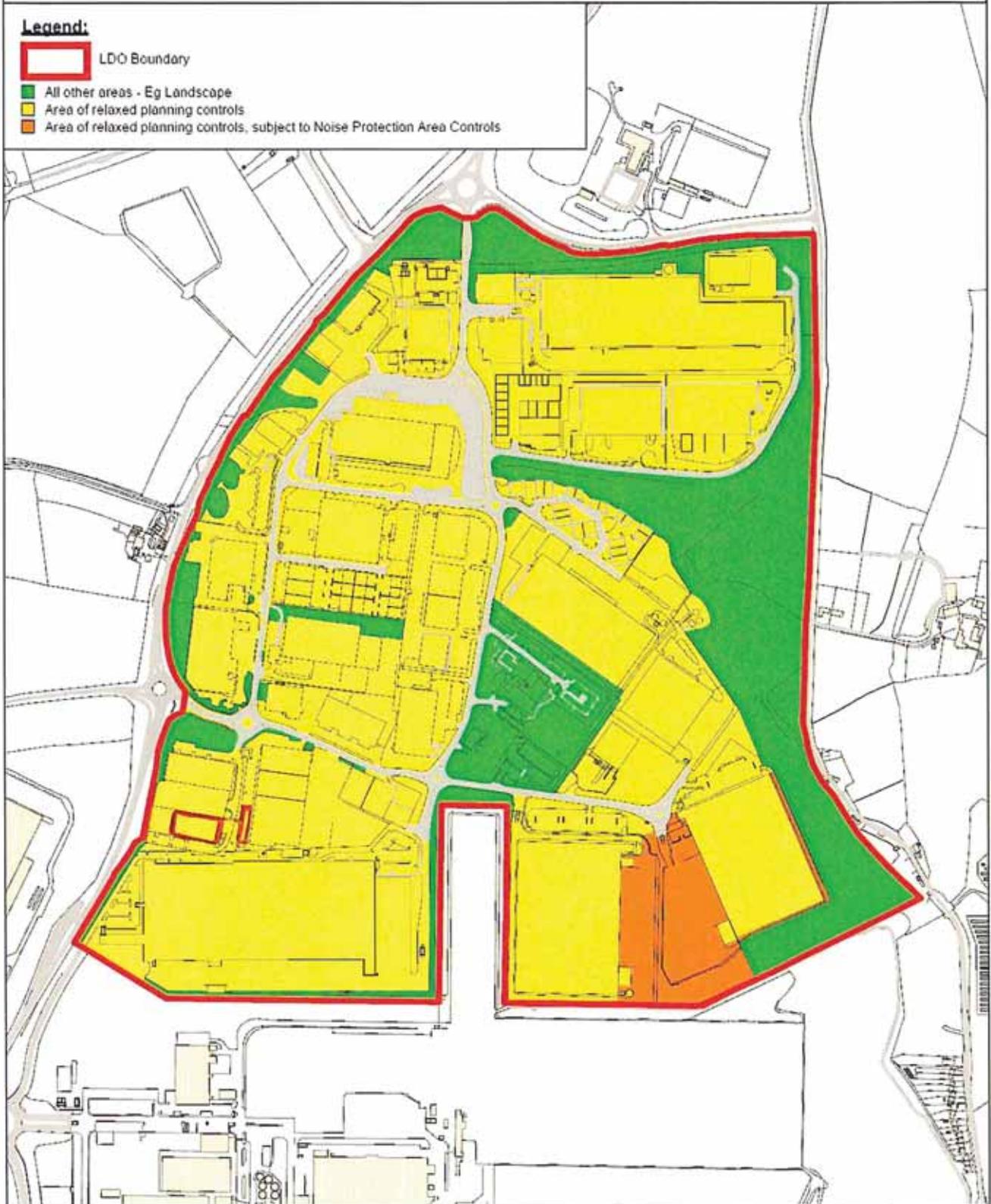
Dave Dewart
Planning Manager

Appendix 2: LDO boundary (site shown in red)

South Marston Industrial Estate - Local Development Order Zoning Map

Legend:

-  LDO Boundary
-  All other areas - Eg Landscape
-  Area of relaxed planning controls
-  Area of relaxed planning controls, subject to Noise Protection Area Controls



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