



## Addendum to Environmental Statement Hownsgill Energy Facility

---

Hownsgill Industrial Estate, Consett, Durham

For:

**Project Genesis Ltd**

CRM.0138.002.PL.R



## Contact Details:

Enzygo Ltd. (Bristol Office)  
The Byre  
Woodend Lane  
Cromhall  
Gloucestershire  
GL12 8AA

tel: 01454 269237  
email: lee.searles@enzygo.com  
www: enzygo.com

## Addendum to Environmental Statement

Project:	Hownsgill Energy Facility
For:	Project Genesis Ltd
Status:	Final
Date:	April 2021
Author:	Sharon Queeney <b>Planning Consultant</b>
Reviewer:	Lee Searles <b>Director of Planning</b>

### Disclaimer:

This report has been produced by Enzygo Limited within the terms of the contract with the client and taking account of the resources devoted to it by agreement with the client.

We disclaim any responsibility to the client and others in respect of any matters outside the scope of the above.

This report is confidential to the client and we accept no responsibility of whatsoever nature to third parties to whom this report, or any part thereof, is made known. Any such party relies on the report at their own risk.

Enzygo Limited Registered in England No. 6525159  
Registered Office Stag House Chipping Wotton-Under-Edge Gloucestershire GL12 7AD

## Contents

---

1	INTRODUCTION .....	1
2	ADDITIONAL INFORMATION .....	3
3	REVIEW OF ES CHAPTERS 1 TO 3.....	13
4	REVIEW OF ES CHAPTER 4 – PLANNING POLICY .....	14
5	REVIEW OF CHAPTER 5 – DEVELOPMENT DESCRIPTION .....	27
6	REVIEW OF ES CHAPTER 6 – NEEDS AND ALTERNATIVES .....	28
7	REVIEW OF ES CHAPTER 7 – LANDSCAPE & VISUAL IMPACT.....	29
8	REVIEW OF ES CHAPTER 8 – GEO ENVIRONMENTAL.....	30
9	REVIEW OF ES CHAPTER 9 – NOISE AND VIBRATION.....	31
10	REVIEW OF ES CHAPTER 10 – AIR QUALITY.....	32
11	REVIEW OF ES CHAPTER 11 – WATER ENVIRONMENT .....	33
12	REVIEW OF ES CHAPTER 12 – CLIMATE CHANGE.....	34
13	REVIEW OF ES CHAPTER 13 – SOCIO ECONOMIC .....	35
14	REVIEW OF ES CHAPTER 14 – AMENITY .....	36
15	REVIEW OF ES CHAPTER 15 – SUMMARY & CONCLUSIONS .....	37
16	REVIEW OF NON-TECHNICAL SUMMARY.....	38
	REFERENCES .....	39

## Appendix

1. Regulation 25 Request for additional information
2. Landscape and Visual Impact
3. Noise
4. Air Quality
5. Climate Change
6. Ecology
7. Response to Public Comments

## SUMMARY

---

- I. This addendum report includes additional information to support planning application DM/20/0326/WAS for the development of an Energy Facility located within the Hownsgill Industrial Estate in Consett.
- II. This information is provided within the main text or as appendices to this addendum and includes all details as requested by Durham County Council in their request for additional information made under Regulation 25 of the Town and County Planning (Environmental Impact Assessment) Regulations 2017 dated 11th March 2021.
- III. This report reviews the additional information submitted to assess whether these result in changes to the predicted effects of the proposals as considered in the Environmental Statement.
- IV. Each topic chapter has been reviewed to confirm if the additional information results in any changes to the assessment undertaken, where necessary providing an updated topic chapter.
- V. This addendum has concluded that the additional information provided does not change the predicted effects of the proposal as stated within the Environmental Statement dated November 2020.

# 1 INTRODUCTION

---

## 1.1 Purpose of ES Addendum

- 1.1.1 This addendum includes additional information to support planning application DM/20/0326/WAS for the development of an Energy Facility located within the Hownsgill Industrial Estate in Consett.
- 1.1.2 This information is provided within the main text or as appendices to this addendum and includes all details as requested by Durham County Council in their request for additional information made under Regulation 25 of the Town and County Planning (Environmental Impact Assessment) Regulations 2017 dated 11th March 2021 (referred to as ‘the Regulation 25 Request’). A copy of this email (and associated attachments) is provided within **Appendix 1** of this addendum.
- 1.1.3 The additional information has then been reviewed to ensure that all details as submitted as part of this addendum are fully taken into account within the EIA.

## 1.2 Consultation

- 1.2.1 Following the submission of the planning application, several statutory consultees had requested additional clarification on aspects of the proposal and associated assessments.
- 1.2.2 These requests have been included within Durham County Council’s Regulation 25 Request and the previously submitted responses have been included within this Regulation 25 Response for completeness.
- 1.2.3 An additional meeting with Durham County Council’s Air Quality team was requested on the 17<sup>th</sup> March 2021 to scope the requirements of the requested work. At this time of writing, no date for this meeting had been confirmed.

## 1.3 Provision of Additional Information

- 1.3.1 Chapter 2 of this report provides the additional information to support the Environmental Impact Assessment.
- 1.3.2 The chapter is structured to replicate that provided within ‘The Regulation 25 Request’ and includes additional technical assessment in appendices where necessary.

1.3.3 This chapter also responds to the matters of clarification also included within 'The Regulation 25 Request' and subsequent emails from both case officers.

#### **1.4 Review of predicted effects**

1.4.1 Chapters 3 to 16 of this addendum reviews the submitted Environment Statement (dated November 2020) to determine whether the information provided in chapter 2 (and appendices) result in changes in predicted effects identified within the Environmental Statement (ES).

1.4.2 Where predicted effects are unchanged there is a general statement to confirm this.

1.4.3 If changes are required to the ES, these could be made in the following way:

- Specific changes to insert and delete new sections are specifically referenced by paragraph number.
- Where changes are made to individual sentences, the whole of the relevant paragraph is reproduced with the text removed shown struck through and the text inserted in bold.
- Where complete chapters are being replaced with a new one, this is made clear at the start of the chapter.

## 2 ADDITIONAL INFORMATION

---

### 2.1 Introduction

2.1.1 The chapter is structured to replicate that provided within 'The Regulation 25 Request' and includes additional technical assessment in appendices where necessary.

### 2.2 New/Amended Proposal

2.2.1 This Regulation 25 Response does not include any new or amended details of the proposed scheme.

### 2.3 Additional Information

2.3.1 The additional information provided as part of this ES Addendum includes the following:

- Landscape and Visual Impact Assessment Response (Appendix 2)

Durham County Council landscape officer initial comments on the application received on 01.03.21 raised concern over (in their view) the permanent increase in urban and industrial character that would be created as a result of the development, which they said would result in 'substantial and moderate adverse effects'. These are set out in **Appendix 1**.

**Appendix 2** to this submission presents a further response to address these concerns. With regard to landscape effects, the development site is actually located within an established industrial estate that is also allocated for industrial and commercial land uses in close proximity to and adjacent to the site. The initial comment from the landscape officer appears to be at odds with the development objectives of the County Plan and Project Genesis masterplan for the former Consett steel works.

**Appendix 2** of this report also addresses comments on the significance of visual impacts to show that any adverse impacts are minor and can be weighed in the planning balance.



- **Noise and Vibration Clarification (Appendix 3)**

It is noted that the review of the submitted ES undertaken by AECOM dated the 23<sup>rd</sup> December 2020 does not constitute an objection. The report requires clarification on a number of issues and concludes that the conclusions of the assessment:

*“(…) is considered a reasonable assertion based upon the results reported and the nature of the local environment (…)”*

The report continues:

*“Should additional assessment and verification confirm the current conclusions to be robust, a condition relating to operational noise should set out the rating levels to be achieved at nearby receptors relative to representative background sound levels”.*

These clarifications are provided in Appendix 3 of this report and it can therefore be concluded that the conclusions of the of the ES remain robust and as such the development should not be refused on the grounds of noise and vibration.

- **Air Quality & Human Health Clarification (Appendix 4)**

It is noted that the review of the submitted ES undertaken by AECOM dated the 12<sup>th</sup> January 2021 does not constitute an objection. Indeed, the report states that:

*“The highest priority concerns are summarised as follows. However, I would not necessarily consider them to alter the conclusions of the assessments”.*

**Appendix 4** seeks to provide clarification on all matters raised within the AECOM letter and concludes that the comments raised are minor and do not alter the conclusions of the assessments. The impacts of the proposed development in terms of air quality, odours and human health therefore remain as not significant.

This position is confirmed through the Environment Agency’s response to the planning application dated 27<sup>th</sup> November 2020.

The email which sets out the Regulation 25 request (**Appendix 1**) also requires that the following information is provided:

- A cumulative impact assessment of the proposal in respect of air quality (dust and odour) with existing and committed developments in the vicinity, including the adjacent Greencore facility and the Anaerobic Digestion Plant at Thomas Swan to the north east.

The Air Quality report contained within **Appendix 4** has assessed the cumulative impact of this scheme against the identified developments and confirms that the proposed development will not have an adverse cumulative impact on dust and odour within the vicinity of the site.

Additional comments raised within the consultation document contained within **Appendix 1** are responded to within the letter to the Low Carbon Economy team included within **Appendix 5**.

It can therefore be concluded that the proposed development should not be refused on air quality and human health matters.

- Climate Change (Appendix 5) seeks to respond all comments raised by the following:
  - Regulation 25 Response: An analysis of the carbon reduction benefit and energy production value of the development against a landfill site with gas recovery.
  - Comments raised by the Low Carbon Economy Team dated 5<sup>th</sup> January 2021.

#### *Carbon Reduction*

Correction Notice: The letter of the 5<sup>th</sup> February 2021 which seeks to respond to matters raised by the Low Carbon Economy Team included a carbon analysis. Since this time, a typo in information has been identified as follows.

“every tonne of waste diverted from landfill to EfW 200g of CO<sub>2</sub> is saved” should read “.....200kg of CO<sub>2</sub> is saved”.

The outcome of the assessment however remains correct and is replicated below (incorporating the update as identified above).

The Environmental Statement refers to the carbon savings of diverting material from landfill to EfW, referencing the widely cited figure from a study by the Green Investment Bank that for every tonne of waste diverted from landfill to EfW 200kg of CO<sub>2</sub> is saved.

On this basis, diverting the 60,000 t/pa of identified waste material currently going to landfill to this facility would equate to a net reduction of 12,000 tonnes of CO<sub>2</sub> per annum.

In terms of the carbon factor of the electricity generated by the facility, operating in power-only mode (i.e with no heat recovery) would indeed produce electricity with a higher carbon factor than that of the National Grid average. This is unsurprising given the level of installed renewable and nuclear energy capacity on the electricity system, and the fact that the non-renewable element predominantly comprises the combustion of conditioned natural gas in highly efficient facilities. However, as above, a like for like comparison does not take account of the full picture.

To quantify the potential benefit in carbon terms of the energy generated at the proposed facility, an absolute measurement of CO<sub>2</sub> emissions performance of the facility is required. With this figure, a direct comparison of the carbon emissions specifically from the energy generated from waste, and the emissions from the marginal energy source it replaces, can be made. For this type of exercise, the energy displaced is generally set in relation to electricity from efficient combined cycle gas turbine (CCGT) plant, which is considered to emit 400 grams of CO<sub>2</sub> equivalent per kilowatt hour (kWh) of electricity generated. Any figure achieved below the level of 400g would equate to a positive carbon benefit for every kWh of energy that is generated.

We have undertaken these calculations for an almost identical facility which utilises the same technology, has the same efficiencies, has a very similar annual throughput and a broadly similar feedstock, i.e. RDF from MSW. To achieve a level below 400g Co<sub>2</sub>/kWh, a heat efficiency of around 13.5% was required. In this case, it is the applicant's intention to recover and export as much heat as possible from the combustion process. A scenario for all of the heat output being successfully exported to off-site users (minus a 5% allowance for heat losses in supply) would equate to a level of -67g Co<sub>2</sub>/kWh. In effect, this means that for every kWh of energy that the facility produces there is a net CO<sub>2</sub> reduction of 467g, as more carbon intensive forms of energy generation are displaced. If we assume a conservative figure of 35,000 MWh of energy is produced by the facility per annum, this equates to a net reduction of circa 26,000 tonnes of CO<sub>2</sub> per annum.

*Landfill with gas recovery*

The assumed figure of 200kg of carbon savings (per tonne of material which is disposed of to EfW over landfill) is taken from the Green Investment Bank's 2014 report on the UK residual waste market. The figures within the report were based on GIB's asset portfolio at that time, which included a number of landfill sites with and without gas recovery, benchmarked against 4 EfW facilities.

As stated within our submission, in reality the CO<sub>2</sub> savings of diverting waste from landfill to facilities such as that proposed are subject to a range of factors, the most important of which is the efficiency of the EfW plant, followed by the feedstock composition in either case and the landfill gas capture rate at landfill.

It is widely accepted that EfW electricity generation from residual waste with a moderate level of heat offtake is preferable in carbon terms to landfill, even with methane capture and utilisation. Zero Waste Scotland's recent technical report (The climate change impacts of burning municipal waste in Scotland) concluded that sending one tonne of residual municipal waste to EfW in Scotland in 2018 emitted 15% less greenhouse gas emissions per tonne than the emissions from sending the waste to landfill instead.

The development proposed is therefore considered to be highly efficient when compared to existing EfW in the U.K, incorporating a high level of heat offtake at the outset. As such, the figure provided in our assessment is considered to represent a conservative criterion on which to base the assessment, and whilst the exact figures are subject to some debate, a significant CO<sub>2</sub> saving is anticipated.

*Low Carbon Economy Team*

The response to the Low Carbon Economy team is provided within Appendix 5 (please note the update in the carbon analysis figures and provided earlier within this chapter). The team have also provided a number of statements which are responded to below:

- *It is concerning that the feedstock for the plant is likely to be Commercial and Industrial Waste:* The proposed development seeks to utilise a Refuse Derived Fuel (RDF) to produce heat and electricity and as such should be

determined against the National Planning Policy for Waste and Durham adopted Local Plan amongst others.

- *There is no use of CCS:* As indicated previously, the proposed development provides a low carbon solution to the management waste which cannot be reused or recycled.
- *Supply and vehicle emissions:* In the context of transportation of waste, the Local Plan recognises that a large proportion of Commercial and Industrial Waste is exported to out of County, it is understood that in some cases the material is exported as far as Europe, and as such the proposal will significantly reduce the distance this material currently travels and as such contributes towards the delivery of policy 61 (c) of the County Durham Plan.
- *The suggestion that because some of the material will be going to landfill which could potentially generate methane (depending on the material) it should be burned instead is entirely misplaced:* Proposals for waste management facilities should demonstrate that they do not 'cut across' and undermine local plan objectives with regard to the movement of waste up the waste hierarchy. The Waste Hierarchy places emphasis on preventing waste from arising and preparing waste for reuse.

Residual wastes are those which cannot be re-used or recycled leaving the only options for management as energy recovery or disposal to landfill.

The proposed development seeks to recovery both heat and energy from the materials contributing to the Circular Economy.

- *Carbon factor for energy being produced:* As identified previously, the proposed development provides a low carbon solution to dealing with the County's Commercial and Industrial waste.
- *Emergency diesel generator:* The Environment Agency only consider emissions from diesel generators as having potential for significant effects where they operate for more than 50 hours per year. As the generators will operate below this threshold, then significant effects are not expected.

Full details of emissions and the assessment of this impact are, however provided within Appendix 5.

- *AQMA*: The Air Quality Assessment has followed standard best practice and uses individual site circumstances and conditions to understand the potential impact of the proposal. The Air Quality report has concluded that the proposed development will not have a significant detrimental impact and this assessment has been agreed by the Environment Agency.
- *CHP ready*: The proposed scheme is for a Combined Heat and Power Plant (CHP) and has heat offtake as a central component of the proposal. The provision of heat is already written into the heads of terms for facilities which include NHS Propco (for the delivery of the new Health Facility on Derwent View).

Project Genesis Ltd also has an Agreement in Principle with Karbon Homes for their proposed 60-unit older persons development on the Derwent View site.

Similar agreements are being made with surrounding users such as examples being Greencore, Symingtons, JT Dove, Go-Ahead Group and Absolute Civil Engineering Ltd.

A legal agreement (and associated connections) cannot be produced until the scheme has gained planning consent. This approach is the similar to most of the emerging CHP plants across the UK.

The Planning Statement in paragraph 3.13.6 confirms that the connection infrastructure will be subject to further planning applications. This is because both the provider and receiver of heat must have the necessary technology in place before the connection routes can be applied for.

- *Policy context*: The response from the Policy officer has confirmed that the proposal could be considered as low carbon energy and as such Policy 33 applies.
- *To would be more beneficial to export some RDFs to Europe*: This statement conflicts with the proximity principle.

**Appendix 5** concludes that the proposed development offers a low carbon solution to dealing with the Counties waste which cannot be reused or recycled.

## 2.4 Responses to Additional Consultee Comments

- 2.4.1 The majority of consultee comments outlined within the Regulation 25 response confirm no objection and (where necessary) suggest conditions.
- 2.4.2 The response from Durham County Council's Drainage Officer states that *"we advise that the surface water from the vehicle circulation areas. Parking and access road should be treated prior to leaving the site"*.
- 2.4.3 For the avoidance of doubt, it is confirmed that the use of a full retention device is proposed to treat surface water. Details of this are included within the submitted drawing 101 in the Flood Risk Assessment report.

## 2.5 Point of Clarification.

- 2.5.1 In addition to the information requested under Regulation 25 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017, Durham County Council have also requested clarification on the following:

- Details of where the waste is coming from including the origin and any intermediary waste transfer stations: It is difficult for any plant which is currently in the planning system to confirm which suppliers will utilise the facility due to issues of supplier confidentiality.

The proposed facility will utilise materials generated principally within County Durham with the possibilities of smaller quantities of materials being transported from bordering authority areas such as South Northumberland and Tyne and Wear. These locations accord with the proximity principle and will reduce the distances wastes currently travel, a large proportion of which are disposed of to landfill or in locations such as the Tees Valley.

The policy officer's response contained within the Regulation 25 request has confirmed that there is a need for further residual treatment capacity which cannot be met by existing operational facilities within County Durham or the wider North East. This should give the Local Planning Authority comfort that Project Genesis Ltd can source sufficient quantities of local waste to be processed by the Energy Plant.

- Details of the locations, type and number of bat and bird boxes to be provided should be shown on the landscape plans for the site and resubmitted.: Details of the proposed

bat and bird boxes are provided within the updated landscape masterplan contained within **Appendix 6**.

- List of Comparable Operational Facilities: Further email requests for additional information relating to a list of comparable facilities were received on the 15<sup>th</sup> and 23<sup>rd</sup> March 2021.

The proposed plant utilises Refuse Derived Fuel (RDF), this fuel is generated from wastes which cannot be reused or recycled (with non-combustible products also removed).

As stated in paragraph 2.5.1, the contracts associated with the RDF have not been confirmed, as such it is difficult to select an exact comparison plant because this will vary based on the agreed inputs. It should be highlighted that the air quality assessment is based on the worst-case scenario and confirms that the proposed development will not have an adverse impact on air quality or human health.

The proposed development seeks to utilise technology from HOST. HOST came into existence in 1991 as the result of a joint-venture between Holec Projects and Stork, two well-established suppliers of energy systems.

From 1999 onwards HoSt has been a fully independent business whose activities focus 100% on the technological development of waste-to-energy systems for the processing of biomass and waste flows and the supply of systems for the sustainable generation of energy from biomass and waste.

HoSt has become a major European supplier of bioenergy systems with over 27 years' experience, a large service team throughout Europe and a team of more than 120 engineers who design, construct and install these advanced bioenergy systems.

The technology offered is based on a step grate, for which there are more than 40 reference plants throughout Europe. 10 of these plants have a boiler capacity between 5-20 MW and use a similar system. They run on various types of RDF, biomass and various wood fuel streams.

The extensive flue gas treatment system is widely recognised to be one of the best in Europe and used in installations fired with both clean and waste stream fuels, they have



been built with fuel flexibility in mind. The type of fuel and local regulation emission requirements determine what flue gas cleaning is applied.

The 'waste-fired boiler' technology was designed around the IED (Industrial Emissions Directive) rules which are applicable within the UK.

In the HoSt waste-fired boiler installation, the RDF fuels are first pre-treated by shredding down to below 250mm.

The firing grate is cooled with recirculation of flue gases. This system is a state-of-the-art technology and requires less maintenance than water cooled grates.

The furnace is designed with 3 stages of air and with flue gas recirculation. By doing this, a controlled combustion takes place and evaporation of unwanted elements is minimized (including thermal NOx). This process ensures that HoSt's flue gas cleaning technology has one of the lowest emissions in the market.

Three of the projects (Bemmel, Duiven and Andijk) have a boiler / installation design that allows for easy conversion to RDF combustion (RDF-ready). Due to the favourable subsidy for biomass in the Netherlands these systems will start up on biomass, but after the subsidy ends these will be converted.

The Andijk plant has seen incredibly low emissions being measured by an independent, government approved company 'Emissie- en Luchtkwaliteitsmetingen B.V.' (Emission and Air Quality Measurements B.V.).

At the current time, HoSt's Experience in RDF combustion comes from the Omrin Waste to energy Plant <https://www.kampstaal.com/en/projecten/waste-to-energy-omrin/> Omrin also published daily emissions data <https://www.omrin.nl/over-omrin/rec-harlingen/luchtemissies/>.

In addition to the above European facilities, HOST have also gained planning consent for facilities in Avondale in Scotland and two smaller plants in Wolverhampton and Suffolk.

## 2.6 Additional Response

- 2.6.1 For completeness, **Appendix 7** sets out Project Genesis Ltd's responses to concerns and comments made by members of the public.

### **3 REVIEW OF ES CHAPTERS 1 TO 3**

---

- 3.1.1 The introductory chapters 1 to 3 are not amended by the additional information provided as part of this addendum.

## **4 REVIEW OF ES CHAPTER 4 – PLANNING POLICY**

---

- 4.1.1 Chapter 4 of the ES sets out the relevant planning policy context for determination of the planning application.
- 4.1.2 The submitted Supporting Statement assessed the proposed development against the identified policies.
- 4.1.3 Table 4.1 below provides additional assessment of the proposed scheme against policies as identified by the Policy Officer contained within the Regulation 25 request.
- 4.1.4 Additional assessment against national planning policy is also provided within Appendix 5 of this Regulation 25 Response.

**Table 4.1: Planning Policy**

<b>Policy</b>	<b>Summarised Policy Officer Comments</b>	<b>Response</b>
<p>CDP Policy 2 Employment Land</p>	<p>The application site is allocated employment and as shown on the policies map for B1 (Business), B2 (General Industrial) and B8 (Storage and Distribution) unless specifically stated. The site also lies within the boundary of the Project Genesis site, which Policy 2 states, “In order to continue to progress the regeneration of Consett the council will support mixed use development on the Project Genesis site, as shown on the policies map, including a site of 10.8 hectares at Hownsgill Industrial Estate for general employment land, provided the development accords with relevant development plan policies”.</p> <p>Please note while the Project Genesis site boundary is shown on the Policies Map and employment land at Hownsgill Industrial Estate is allocated (...).</p> <p>The Concept Masterplan does not form part of the statutory development plan, other than the allocated employment land, the CDPs support for mixed use development of the Project Genesis Site is subject to proposals according with relevant development plan policies. See also CDP paragraph 4.38.</p>	<p>The County Durham Local Plan, policy 61 sets out the locational requirements for waste management uses. These requirements can be summarised under the following headings:</p> <ul style="list-style-type: none"> <li>• Proposals shall not be located within environmental/greenbelt/landscape designated areas.</li> <li>• Proposals should minimise transportation of waste and protect the local highway network.</li> <li>• Proposals should be located on existing waste management sites, with complementary activities and users of outputs.</li> <li>• Proposals should be located on employment/industrial land, previously developed land but not on strategic or specific user employment sites.</li> <li>• Proposals should not have an unacceptable impact on the environment and health.</li> <li>• Proposals should be able to demonstrate that they generate useable electricity and heat.</li> </ul> <p>As referenced by the planning officer, the proposed development is located on a recognised and allocated industrial estate and therefore accords with the locational policy of the Durham Local Plan.</p> <p>It is recognised that the concept masterplan does not form part of the statutory development plan, however paragraph 4.38 identified the concept masterplan to determine the developable zones of the area and the types of uses it can support. The paragraph proceeds to recognise the important role of Project Genesis in continuing to bring forward further development in the future.</p>

<p>CDP Policy 21 (Delivering Sustainable Transport)</p>	<p>The transport implications of development must be addressed as part of any planning application (...).</p> <p>On the basis that the proposed development is waste development, footnote 70 applies and regard must be had to the remaining saved transport related policies of the CDWLP.</p>	<p>The planning application was supported by a Transport Statement which concludes that the proposed development can be accommodated in this location.</p> <p>No objections have been received by County Highways.</p>
<p>CDP Policy 25 (Developer Contributions)</p>	<p>Amongst its provisions advises that new development will be approved where any mitigation necessary to make the development acceptable in planning terms is secured through appropriate planning conditions or planning obligations.</p>	<p>Mitigation measures are proposed as part of the scheme and these will be implemented by Project Genesis on the gain of planning approval.</p>
<p>CDP Policy 26 (Green Infrastructure)</p>	<p>Amongst its provisions advises that development will be expected to maintain and protect, and where appropriate improve, the county's green infrastructure network.</p> <p>In relation to Public Rights of Way it advises that proposals that would result in the loss of, or deterioration in the quality of, existing Public Rights of Way (PROWs) will not be permitted unless equivalent alternative provision of a suitable standard is made.</p>	<p>The proposed development site is allocated for industrial land and as such does not provide the County with Green Infrastructure. However, a substantial landscape buffer is provided as part of the design and this will include bat and bird boxes.</p> <p>The Access and Rights of Way Officer has confirmed that there are no registered Public Rights of Way affected by this proposal.</p>
<p>CDP Policy 29 (Sustainable Design)</p>	<p>Relevant Policy 29 criteria appear to be a) to k). Criteria c) is particularly applicable it advises that proposals should "minimise greenhouse gas emissions, by seeking to achieve zero carbon buildings and providing renewable and low carbon energy generation and include connections to an existing or approved district energy scheme where viable opportunities</p>	<p>The proposed development seeks to divert residual waste from landfill, the landfilling of wastes creates greenhouses gases such as methane which has a high Green House Potential.</p> <p>The facility provides a low carbon solution to dealing with this waste (calculations are provided within Chapter 2 of this addendum).</p>

	<p>exist". Criteria c) advises, "provide high standards of amenity and privacy, and minimise the impact of development upon the occupants of existing adjacent and nearby properties"; and criteria f) advises, "contribute towards healthy neighbourhoods and consider the health impacts of development...".</p>	<p>The proposed development seeks to utilise materials than cannot be reused or recycled to generate electricity (which is defined as partially renewable) and heat which will be used by other developments within the district (a district heating scheme). This accords with the principles of the Waste Hierarchy which seeks to ensure that heat and electricity is recovered from residual waste.</p> <p>Effective and sustainable waste management is a key theme in ensuring healthy neighbourhoods. The Air Quality and Human Health assessment submitted as part of the planning application and Environmental Statement has confirmed that the emissions from the facility will not have a detrimental impact on air quality or human health.</p>
<p>CDP Policy 31 (Amenity and Pollution).</p>	<p>Given that waste management proposals and in particular incinerators can be controversial and that local concerns will include impacts of pollution upon human health and amenity issues (noise, odour and light pollution) this is a key policy for the determination of this planning application. The policy is a repetitive policy which has many elements and requires:</p> <ul style="list-style-type: none"> <li>• A demonstration of no unacceptable impact, either individually or cumulatively, on health, living or working conditions or the natural environment. That development which has the potential to lead to, or be affected by, unacceptable levels of air quality, inappropriate odours, noise and vibration or other sources of pollution, either individually or cumulatively, will not be permitted including where any identified mitigation cannot reduce the impact on the environment, amenity of people or human</li> </ul>	<p>The Environmental Impact Assessment and associated clarifications contained within this addendum have demonstrated that the proposed development will not have a detrimental impact on human health, amenity, noise, odour or light pollution. In addition:</p> <p>The assessment has demonstrated that there will be no unacceptable impacts, either individually or cumulatively on health, living conditions or the natural environment.</p>

	<p>health to an acceptable level. That development which does not minimise light pollution and demonstrate that the lighting proposed is the minimum necessary for functional or security purposes will not be permitted.</p> <ul style="list-style-type: none"> <li>• That the development can be integrated effectively with any existing business and community facilities. Potentially polluting development will not be permitted near to sensitive uses unless satisfactory mitigation can be demonstrated.</li> <li>• That any existing business and/or community facilities do not have any unreasonable restrictions placed upon them as a result of unacceptable impacts such as through overlooking, visual intrusion, visual dominance or loss of light, noise or privacy.</li> <li>• A demonstration that that future occupiers of the proposed development will have acceptable living and/or working conditions.</li> </ul>	<p>The proposed development is situated within an existing industrial estate. It is widely recognised that waste uses are similar in nature to B2 uses which are proposed and consented on the Hownsgill Industrial Estate.</p> <p>Existing businesses will not be detrimentally affected by the proposed development. The provision of district heating will provide benefits to surrounding businesses.</p> <p>The location of the site within an allocated industrial estate ensures that the proposed facility will be located with similar uses (B2 in nature) as confirmed by national and local waste policy.</p>
<p>CDP Policy 32 (Despoiled, Degraded, Derelict, Contaminated and Unstable Land).</p>	<p>This policy is relevant given the history of the site which could have resulted in contamination being on the site and the application site's location in a coal mining high risk area.</p>	<p>The development site has been subject to previous remediation, additional conditions suggested will ensure that the proposal will have a beneficial impact on land quality at the site.</p> <p>The proposed development will not emit any pollution to ground.</p>

<p>CDP Policy 33 (Renewable and Low Carbon Energy).</p>	<p>While the proposal is an energy from waste plant it is proposed that in addition to electricity for local users, heat would also be generated which could be supplied to customers within the nearby area. Through not using fossil fuels the proposal could be considered to be low carbon. Policy 33 affords support to low carbon energy development in appropriate locations. It also advises that significant weight will be given to the achievement of wider social, environmental and economic benefits.</p>	<p>Chapter 2 of this addendum identifies that the proposed development would provide a carbon benefit of 26,000tpa when against landfilling (including gas utilisation).</p> <p>The proposed development will feed into a district heating system as described in chapter 2 of this addendum, providing sustainable heat to surrounding users benefiting the local economy.</p> <p>The locational, environmental and social impacts are described within the submitted Environmental Statement and this addendum concludes that the proposed development will not have any adverse impacts on the wider social or environmental context.</p>
<p>CDP Policy 35 (Water Management)</p>	<p>Relates to flood risk and sustainable drainage systems would be applicable. The policy also addresses water quality, and this matter is also addressed under CDWLP Policy W26.</p>	<p>The assessment contained within the submitted Environmental Statement has demonstrated that the proposed development will operate with minimal risk from flooding, will not increase flood risk elsewhere and is compliant with the requirements of national and local policy guidance.</p>
<p>CDP Policy 36 (Water Infrastructure)</p>	<p>Relates to a number of matters of which disposal of foul water would be applicable.</p>	<p>It is proposed that foul flows will discharge to the adjacent private foul sewer.</p>
<p>CDP Policy 38 (North Pennines Area of Outstanding Natural Beauty)</p>	<p>Amongst its provisions requires that development in or affecting the AONB will only be permitted where it is not, individually or cumulatively, harmful to its special qualities or statutory purposes.</p> <p>Given the location of the AONB boundary 2.5km west the council will need to consider these provisions of the policy.</p>	<p>The Landscape and Visual Impact Assessment submitted as part of the Environmental Statement has assessed the proposed development's impact on the AONB and concluded that the development will have a negligible impact on the designation.</p>



<p>CDP Policy 39 (Landscape)</p>	<p>Would be applicable.</p>	<p>The Landscape and Visual Impact assessment submitted as part of the Environmental Statement and this addendum has assessed the proposed developments impacts of the development on landscape and has concluded that the proposal does not result in significant adverse effects on the local landscape.</p> <p>Comments raised by the Landscape officer have not taken into account the current and future industrial context of the site.</p>
<p>CDP Policy 41 (Biodiversity and Geodiversity) and CDP Policy 43 (Protected Species and Nationally and Locally Protected Sites)</p>	<p>Would be applicable.</p>	<p>The site is made up of remediated previously developed land.</p> <p>An ecological assessment has been submitted in support of the planning application which concludes that the development would have no significant residual impacts which would prevent a favourable planning determination.</p> <p>These conclusions have been confirmed by the County Ecologist.</p>
<p>Policy 44 (Historic Environment)</p>	<p>Would be applicable.</p>	<p>A Historic Environment Assessment has been submitted as part of the planning application which concludes that the development would have no significant residual effects on any designated or undesignated assets.</p> <p>Given the low archaeological potential of the site, no further archaeological field survey is considered necessary in this case.</p> <p>These conclusions have been confirmed by the Council Archaeology officer.</p>

<p>Policy 47 (Sustainable Minerals and Waste Resource Management).</p>	<p>In particular, this policy promotes, encourages and seeks to facilitate the development of a sustainable resource economy in County Durham. In particular:</p> <p>criteria a) seeks to ensure “that waste is managed in line with the waste hierarchy in sequential order”. In this regard it will be essential that the operation of the facility does not prejudice this requirement, only residual waste which has been subject to recycling first should be used within the plant. In terms of the waste hierarchy as shown on Figure 4 of the CDP incineration falls within “other recovery”.</p> <p>Criteria a1) is supportive of proposals which “increase the capacity and capability of the county’s network of waste management facilities to reuse, recycle and recover value from waste materials”.</p> <p>Criteria a2) seeks to resist, “proposals for the disposal of residual waste via landfill or via the incineration of waste without energy recovery unless a need can be demonstrated which cannot be met by existing facilities and by treatment solutions higher in the waste hierarchy”.</p> <p>Criteria b) seeks to support opportunities for on-site management of waste where it arises and encourages the co-location of waste developments with industrial uses so that waste can be used as a raw material. A proposal which uses residual waste as a raw material in an incinerator to provide</p>	<p>The proposed development complies with the requirements of this policy as follows:</p> <p>In accordance with the principles of the waste hierarchy, the proposed development seeks to move the management of residual waste (waste which cannot be reused or recycled) up the waste hierarchy to recover both energy and heat.</p> <p>It is confirmed that no recyclable material will be processed by the plant.</p> <p>Durham Council currently have an identified capacity gap for the management of residual non hazardous waste (confirmed by the policy officer within the Regulation 25 request). The proposed plant would make a contribution towards this deficit.</p> <p>As outlined within Chapter 2 of this addendum, the proposed development seeks to recover both heat and energy.</p> <p>The policy officer has confirmed that the proposed development meets the locational requirements of this policy.</p>
--	--	--

	<p>energy and heat to nearby industrial users would meet these criteria.</p>	
<p>CDP Policy 60 (Waste Management Provision)</p>	<p>Is permissive towards the provision of new or enhanced waste management capacity will be permitted where they can demonstrate that they accord with criteria a, b and c.</p> <p>Criteria a) advises, “contribute to driving the management of waste up the waste hierarchy and do not prejudice the movement of waste up the waste hierarchy”. In terms of the waste hierarchy as shown on Figure 4 of the CDP incineration falls within “other recovery”.</p> <p>Criteria b) advises, “b. assist in moving the management of waste in County Durham towards net self-sufficiency and/or make an appropriate contribution to regional net self-sufficiency by managing waste streams as near as possible to their production.</p> <p>The full text associated with this response can be seen in Appendix 1, however the policy officer confirms that a scheme which would utilise 60,000 tonnes of commercial waste could make a contribution to both County Durham and regional self-sufficiency.</p> <p>Criteria b) also refers to managing waste streams as near as possible to their production and is intended to reflect the established proximity principle which is an important part of European and National policy. The planning application refers</p>	<p>The policy officer confirms that the proposed plant accords with the waste hierarchy.</p> <p>The policy officer confirms that there is an existing capacity gap for the management of this waste and as such the proposed development would make a contribution to this requirement.</p> <p>Chapter 2 of this addendum confirms that the proposed development would utilise local waste in accordance with the proximity principle.</p>

	<p>to 60,000 tonnes of Refuse Driven Fuel which suggests that the commercial waste which is proposed to be used would originate from a material recycling facility, although reference is only made to collection and segregation prior to delivery. Information on the proposed origin and continued long term availability of this waste will be required to assess whether the proposal would accord with this element of this criteria. Given the application sites location in North West Durham, it is considered that residual commercial waste which did not arise within a proximate location which could include County Durham, and neighbouring areas of Northumberland and Tyne and Wear would likely fail to meet this element of the policy, although this is a matter which would need to be considered by the case officer.</p> <p>Criteria c) refers to “assist in meeting the identified need for new waste management capacity to manage specific waste streams over the Plan period or can demonstrate an additional need which cannot be met by existing operational facilities within County Durham or the North East. (...)</p> <p>The Policy officer provides their own analysis of both local and regional need concluding that “on the basis of the available information there is a future need for further residual treatment capacity which cannot be met by existing operational facilities within County Durham or the North East.</p>	<p>The capacity gap which has been confirmed by the policy officer demonstrates that there is sufficient waste within the locality to sustain the plant.</p> <p>It is emphasised that the NPPW states that applicants only need to demonstrate market need for a proposed facility if it conflicts with the Local Plan of the area. In such a case, the waste planning authority should consider the extent to which operational facilities (i.e. not merely ‘planned’) can satisfy any identified need.</p> <p>Exact waste arrangements cannot be confirmed until contracts are signed.</p> <p>The policy officer has confirmed that there is an identified need for the proposed facility.</p>
--	---	--

	<p>The officer continues to remind the reader that the Local Plan states that the council will consider positively planning applications to provide additional treatment capacity. It is recognised that such facilities could assist in managing waste towards the top of the waste hierarchy and could contribute both to net and regional self-sufficiency. Such proposals will be looked upon favourably where the proposal is acceptable in all other respects taking into account all relevant Plan policies”.</p>	
<p>CDP Policy 61          (Location of          New Waste          Facilities)</p>	<p>Provides locational criteria to enable the consideration of the location of facilities. The proposed development would need to comply with criteria a), b), c) and either criterion d) or e). The policy is intended to be read alongside other relevant policies where appropriate.</p> <p>Criteria a) requires that they, “are located outside and do not adversely impact upon the setting or integrity of internationally, nationally and locally designated sites and areas”.</p> <p>Criteria b) refers to “are located outside the Green Belt or are in locations which do not impact upon its openness”.</p> <p>Criteria c) refers to “minimise the effects of transporting waste including by locating as close to arisings as practical”, see comments above in relation to the proximity principle.</p> <p>Criteria d) states, “can be satisfactorily located as part of an existing waste management facility, or where the waste</p>	<p>The proposed development is located outside designated areas and the Environmental Statement submitted alongside the planning application has confirmed that there will be no adverse impacts on these designations.</p> <p>The site is located outside the Green Belt.</p> <p>This is discussed within chapter 2 of this addendum which concludes that the provision of this facility will significantly reduce the miles that waste is transported for disposal, according with the proximity principle.</p>

	<p>management facility can be satisfactorily co-located with complimentary activities and potential users of recovered materials, recycles and soils, energy and heat, where appropriate and feasible and where this represents a sustainable option.</p> <p>Criteria e) refers to “can be satisfactorily located on suitable land identified for employment use, or on suitable previously developed land in the larger towns and villages where the site can serve a local or larger catchment except”.</p> <p>The policy also advises, that “all proposals must demonstrate that there will be no unacceptable adverse impact on the environment, human health or the amenity of local communities”.</p>	<p>The proposed development is located on an industrial estate which is similar in nature to the proposed use and is located in close proximity to users of the heat.</p> <p>The proposed development is located on an Industrial estate.</p> <p>The planning submission and associated Environmental Statement concludes that the development will not have any significant adverse effects.</p> <p>This has been confirmed by responded from the statutory consultees.</p>
<p>Relevant saved County Durham Waste Local Plan Policies are:</p>	<p>W6 (Design) - This policy is considered to be up to date it is not time limited policy and has been assessed as consistent with the NPPF and the NPPW.</p> <p>W26 (Water Resources) - This policy is considered to be up to date it is not time limited policy and has been assessed as consistent with the NPPF and the NPPW.</p> <p>W29 (Modes of Transport), W31 (Environmental impact of road traffic); and W32 (Planning obligations for controlling environmental impact of road traffic) - These policies are not</p>	<p>The proposed facility is similar in nature to the other B2 units on the industrial estate. The proposed development includes a landscape buffer.</p> <p>The Environmental Statement has demonstrated that the proposed development will not affect the quality of surface or ground water reserves on the site or in the vicinity of the site.</p> <p>The Transport Statement submitted as part of the planning application concludes that the proposed development will not have a detrimental impact on the local highway.</p>

	<p>time limited and apart from W32 all accord with the NPPF as well as the NPPW. (...)</p> <p>W35 (Cumulative Impact) - This policy is up to date it is not time limited policy and has been assessed as consistent with the NPPF and NPPW.</p>	<p>The Environmental Impact Assessment has assessed the impact of the proposed development both on its own and cumulatively and concluded that the proposed development will not have a significant adverse environmental impact.</p>
--	---	---

## **5 REVIEW OF CHAPTER 5 – DEVELOPMENT DESCRIPTION**

---

- 5.1.1 The information contained within this Regulation 25 Response does not alter any of the details provided within this chapter.



## **6 REVIEW OF ES CHAPTER 6 – NEEDS AND ALTERNATIVES**

---

- 6.1.1 The additional information submitted, identified within chapter 2 of this ES Addendum, does not result in a change to the assessment contained within this chapter.

## **7 REVIEW OF ES CHAPTER 7 – LANDSCAPE & VISUAL IMPACT**

---

- 7.1.1 The additional information submitted, identified in chapter 2 of this ES Addendum, does not result in a change to the predicted effects as described in the Landscape and Visual Impact Assessment (Chapter 7) within the ES and would present no impediment to the implementation of environmental mitigation measures.

## **8 REVIEW OF ES CHAPTER 8 – GEO ENVIRONMENTAL**

---

- 8.1.1 The additional information submitted, identified in chapter 2 of this ES Addendum, does not result in a change to the predicted effects as described within the Geo Environmental Chapter (Chapter 8) within the ES and would present no impediment to the implementation of environmental mitigation measures.

## **9 REVIEW OF ES CHAPTER 9 – NOISE AND VIBRATION**

---

- 9.1.1 The additional information submitted, identified in chapter 2 of this ES Addendum, does not result in a change to the predicted effects as described in the Noise and Vibration Chapter (Chapter 9) within the ES and would present no impediment to the implementation of environmental mitigation measures.

## **10 REVIEW OF ES CHAPTER 10 – AIR QUALITY & HUMAN HEALTH**

---

10.1.1 The additional information submitted, identified in chapter 2 of this ES Addendum, does not result in a change to the predicted effects as described in the Air Quality and Human Health (Chapter 10) within the ES and would present no impediment to the implementation of environmental mitigation measures.

## **11 REVIEW OF ES CHAPTER 11 – WATER ENVIRONMENT**

---

- 11.1.1 The additional information submitted, identified in chapter 2 of this ES Addendum, does not result in a change to the predicted effects as described within the Water Environment Chapter (Chapter 11) of the ES and would present no impediment to the implementation of environmental mitigation measures.

## **12 REVIEW OF ES CHAPTER 12 – CLIMATE CHANGE**

---

- 12.1.1 The additional information submitted, identified in chapter 2 of this ES Addendum, does not result in a change to the predicted effects as described within the Climate Change Chapter (Chapter 12) of the ES and would present no impediment to the implementation of environmental mitigation measures.

## **13 REVIEW OF ES CHAPTER 13 – SOCIO ECONOMIC**

---

- 13.1.1 The additional information submitted, identified in chapter 2 of this ES Addendum, does not result in a change to the predicted effects as described in the Socio Economic Chapter of the ES (Chapter 13), and would present no impediment to the implementation of environmental mitigation measures.



## **14 REVIEW OF ES CHAPTER 14 – AMENITY**

---

- 14.1.1 The additional information submitted, identified in chapter 2 of this ES Addendum, does not result in a change to the predicted effects as described in the Amenity Chapter of the ES (Chapter 14) and would present no impediment to the implementation of environmental mitigation measures.

## **15 REVIEW OF ES CHAPTER 15 – SUMMARY & CONCLUSIONS**

---

- 15.1.1 The additional information submitted, identified in chapter 2 of this ES addendum, does not result in a change to the predicted effects as described in Cumulative Impacts or Concluding section within the ES (Chapter 17).
- 15.1.2 Project Genesis Ltd remain committed to all mitigation measures as set out within the Environmental Statement.

## **16 REVIEW OF NON-TECHNICAL SUMMARY**

---

- 16.1.1 The additional information submitted, identified within chapter 2 of this ES addendum, does not result in a change to the description of the proposal or predicated effects as set out within the Non-Technical Summary.

## REFERENCES

---

The Town and Country Planning (Environmental Impact Assessment) Regulations 2017.

## **Appendix 1 – Copy of Regulation 25 Request**

---

See separate PDF attachment

## **Appendix 2 – Landscape & Visual Impact Addendum**

---

See separate PDF attachment

See separate PDF attachment

See separate PDF attachment



## **Appendix 5 – Climate Change**

---

See separate PDF attachment

See separate PDF attachment

## **Appendix 7 – Response to Public Comments**

---

See separate PDF attachment



**Enzygo specialise in a wide range of technical services:**

**Property and Sites**

**Waste and Mineral Planning**

**Flooding, Drainage and Hydrology**

**Landscape Architecture**

**Arboriculture**

**Permitting and Regulation**

**Waste Technologies and Renewables**

**Waste Contract Procurement**

**Noise and Vibration**

**Ecology Services**

**Contaminated Land and Geotechnical**

**Traffic and Transportation**

**Planning Services**

---

**BRISTOL OFFICE**

The Byre  
Woodend Lane  
Cromhall  
Gloucestershire GL12 8AA  
Tel: 01454 269 237

**SHEFFIELD OFFICE**

Samuel House  
5 Fox Valley Way  
Stocksbridge  
Sheffield S36 2AA  
Tel: 0114 321 5151

**MANCHESTER OFFICE**

First Floor  
3 Hardman Square  
Spinningfields  
Manchester M3 3EB  
Tel: 0161 413 6444

---

Please visit our website for more information.

[enzygo.com](http://enzygo.com)