

29 Nightingale Rd
Blackrod
Bolton
BL6 5DX
28-Aug-16

Application 97204/16

CERTIFICATE OF LAWFUL DEVELOPMENT FOR THE PROPOSED INTRODUCTION OF ADDITIONAL FUEL INPUTS TO EXISTING GASIFICATION PLANT.

Dear Sir / Madam,

I would respectfully ask you to refuse the requested certificate of lawful development in this case for a number of reasons that I have listed below.

The request is not supported by a comprehensive statement of the implications of the requested change. Planning guidance document "*Lawful Development Certificates - A User's Guide*" is clear in section 10 where it states "*It must provide sufficient factual information for the authority to decide the application*"

The application does not address the following within the application;

- a) The form of RDF fuel to be used (bales, pellets, sorted or unsorted MSW)
- b) The quantity of RDF fuel to be used (as the calorific value of RDF is about half that of wood it's use will have a significant impact on the operation of the facility [increased deliveries, storage quantities and waste produced]).
- c) The facility originally approved can't process RDF so a completely new plant design will be required. This is a major change and yet no details have been provided by the applicant.
- d) The original application was to be located in an "*agricultural building*" [letter from agent 21-Oct 2008]. This seems to be wholly inappropriate for the storage and use of, what is in essence, municipal solid waste.
- e) The original EIA screening did not consider the delivery, storage, incineration of processed municipal solid waste, together with the removal of its combustion by products as the original facility was to be solely wood burning. The move to RDF makes this a facility more in line with Raikes Lane in that it will need to comply with the Waste Incineration Directive. This type of facility should not be located in the green belt.
- f) The incineration of RDF does produce dangerous emissions. The original facility had no filtration system and no details of the proposed system have been given. The proposed filtration system should be considered by the planning process as it will present planning issues (odour, noise, delivery and storage of toxic chemicals (eg. Ammonia)).

As the applicant has not provided sufficient information to allow you to fully consider the application I hope you refuse their request.

In fact I hope you go further and state that the magnitude of the proposed changes are such that a full planning application together with an EIA would be the appropriate way consider the use of RDF as fuel.

Yours faithfully

Bryan Stears