

*Blackrod and Horwich  
Environmental Action Group  
Two Communities - One Cause*

Monday, 29 August 2016

Dear Sir / Madam,

We feel it would be inappropriate to allow the incineration of waste at the facility by virtue of the issue of a Certificate of Lawfulness as requested by the applicant (97204/16).

The application was originally considered as a Biomass facility that only used non treated wood as a fuel stock. This point is clearly made throughout the application in documentation from the applicant and the planning office. It is also why in the screening opinion only considered the facility against EIA categories 3a, and 10a. The request to use refuse derived fuel (RDF) will now satisfy category 11b and as such a screening opinion would be required.

It was stated by the applicant throughout the initial application that the chosen equipment could not use any fuel other than wood. This fact would suggest that new equipment is proposed but this is not clear from application 97204/16. It was clearly stated during the initial application that CO<sub>2</sub> would be the only emission from the facility, this will not be the case with RDF fuel. The following definition of RDF is included to highlight constituents of the fuel.

*Refuse-derived fuel (RDF) or solid recovered fuel (SRF) is a fuel produced by shredding and dehydrating solid waste (Municipal Solid Waste or MSW). RDF consists largely of combustible components of municipal waste such as plastics and biodegradable waste.*

It should be noted that the original EIA opinion was drafted against the initial proposal but it was never revisited following the major change in design made during the application process.

The request to use RDF fuel is a significant change to the original proposal. If permission is granted by means of a Certificate of Lawfulness this development would not be measured against the latest planning legislation. The original application was for a biomass generation facility in the green belt. This application is, in reality, for a waste burning generation facility in the green belt therefore it would be appropriate that a full planning application be submitted.

Yours Faithfully

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## Comments on Application 97204/16

When the applicant states [Para 4] that as no condition is placed on the development limiting the facility to using wood they are in fact being disingenuous. It was clearly stated throughout the application process, in the officers report and many other documents, that this facility that was to be only wood fuelled. It was also stated that the facility could only operate with wood.

Therefore it is clear that when the planning committee gave permission it was on the basis that the facility would be wood fuelled.

It was also stated that the facility could only use untreated wood waste. Does this mean that equipment different to that original assessed is proposed in the facility? If this is the case then this is another reason why any change should be proposed by the submission of a full and comprehensive planning application.

We also contest the applicants assertion that the nature of the plant does not change [Para 6]. The fact that the applicant now wishes to convert the facility to burning processed MSW waste is a fundamental change to the facility. The EIA screening opinion carried out on the original application does not consider the storage and incineration of RDF.

The applicant goes on to state that if the council had been concerned that the use of non wood fuels that they should have controlled the fuel used by the facility by condition [Para 11]. This seems to be a preposterous assertion given the fact that the application clearly stated that the facility was to be wood fuelled. This together with the statement that the proposed gasification equipment could only operate with wood fuel made such a condition unnecessary.

The screening opinion referred to by the applicant [Para 13] does not, as the applicant states, support the proposal to use RDF as a fuel source as it does not acknowledge that the use of RDF will mean that the development now satisfies the criteria of category 11b column 2. As such an EIA screening should be completed.

It is our belief that the use of RDF in this facility should be supported by an EIA . This is particularly so when you consider the fact that the original screening opinion was based on the fact that wood was to be used (meaning that only CO<sub>2</sub> would going to be emitted). If fuel derived from MSW is used then the hazards of storing and incinerating the fuel should be considered.

Part of the justification of this facilities appropriateness for the green belt [Policy EM2] was that the facility only operated with virgin wood. The proposal to use RDF in the facility severely undermines the case for this being an appropriate development for the green belt.