

From: [REDACTED]
To: [Rivenhall IWME](#)
Cc: [REDACTED]
Subject: Application by Indaver Rivenhall Ltd for an Order Granting Development Consent for the Rivenhall IWME and Energy Centre Project- Rule 6 letter response
Date: 07 May 2024 18:39:55
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Good Afternoon

Please find attached our letter in respect of the ExA's request in the Rule 6 letter

Please accept my thanks for your email in advance - each person sending one less 'thank you' email a day would save more than 16,400 tonnes of carbon a year!

Barbara Moss-Taylor | Sustainable Places Planning Specialist - Pronouns: she/her ([why is this here?](#))

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My working pattern is Monday -Friday, in my absence please call [REDACTED]

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National Infrastructure Planning
Temple Quay House
2 The Square
Bristol
BS1 6PN

Our ref: AE/2024/129472/01-L01
Your ref: EN010138
Date: 07 May 2024

Dear Sir/Madam

APPLICATION BY INDAVER RIVENHALL LTD FOR AN ORDER GRANTING DEVELOPMENT CONSENT FOR THE RIVENHALL IWMF AND ENERGY CENTRE SCHEME. RULE 6 LETTER

This response relates to the Examining Authority's Rule 6 letter dated 12 March 2024 (Annexe E, page 52) which requested that the Applicant and the Environment Agency prepare a Statement of Common Ground (SoCG) in respect of three issues. It has been suggested that this can be addressed more directly by setting out our response to these issues in a letter.

Question

existing and any varied or new Environmental Permits, including their status, scope, controls, mitigation measures and timescales;

Environment Agency answer:

The relevant environmental permit in place is detailed below:

Permit number:	EPR/CP3906LP
When issued to previous owner/operator:	11/09/17
When varied and issued to current owner/operator:	23/04/21
Status:	Current

Description:

Incineration of Non-Hazardous Waste 5.1 A(1) b)
Recovery Or A Mix Of Recovery And Disposal Of > 75 T/D Non-Hazardous Waste (> 100 T/D If Only Ad) Involving Biological Treatment - 5.4 A(1) b) (i)
Paper, Pulp And Board; Producing Pulp From Timber Etc - 6.1 A(1) a)

The proposed development requires no further environmental permits from the Environment Agency under the provisions of the Environmental Permitting (England and Wales) Regulations 2016, to operate. The Environmental Permit detailed above remains in force. Should the development consent order be refused the Applicant would be able to operate the facility using the existing permit. The requirement to apply for a Development Consent Order was triggered by the proposal to increase the amount of energy generated from the Consented scheme, but neither the quantity of waste nor the operational boundaries were changed and so no variation of the permit was required.

The impacts of operating this waste facility are mitigated in the environmental permit through limits set on factors such as tonnage, vehicle movements and operating hours as well as reviewing the design parameters for the control of emissions such as stack heights.

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There is no timescale for the environmental permit in place as such because it is already in place. The Environment Agency carries out checks to ensure that permitted installations comply with the conditions of their environmental permit. An environmental permit remains in place unless variations are required due to change of ownership or operator, increase in total waste handled, variations to operating times, expansion beyond existing boundaries or surrender.

As a result of this the Environment Agency does not consider that this proposal conflicts with its environmental permit.

Question

-climate change, including the UK's obligations under the Climate Change Act 2008 (as amended) and the United Nations Framework Convention on Climate Change having regard to the latest UK Climate Change projections. The resilience of the Proposed Development to the effects of climate change;

Environment Agency answer:

We agree that waste to energy is classed as renewable energy and the use of energy generated will reduce reliance on fossil fuel sources which emit a greater concentration of greenhouse gasses. As such, it is a contributor to achieving the obligations under the Climate Change Act. We agree that calculations of the offset of emissions generated should be for the additional power over and above the Consented scheme. Generating more energy from the same input has the effect of increasing the offset and so increasing the contribution to achieving the Climate Change Act obligations.

In respect of the resilience of the proposed development to climate change, the Environment Agency are satisfied that the location chosen is at low risk of flooding from rivers or sea currently and for the design life of the project. Please note that the Environment Agency is not the Competent Authority for surface water drainage and flooding.

Another climate change concern is water supply in the region. East Anglia is an area of water stress which is likely to be affected by climate change. However, we note that the proposed development does not increase water demand above that for the Consented scheme and so no additional burden on regional water resources.

Question

-the identification of other consents, permits or licenses required before the development can become operational, their scope, progress to date, comfort/impediments and timescales for issue.

Environment Agency answer:

In respect of the Environmental Permitting Regulations, the proposal has the necessary permit required for the development to operate.

We trust that this response is of assistance.

Yours faithfully


Barbara Moss-Taylor
Planning Specialist

Direct dial 

Direct e-mail environment-agency.gov.uk

End