



The Planning Inspectorate

Your ref: WS010005

By email:

ENRMFextension@planninginspectorate.gov.uk

Date: 11 May 2022

Dear Sir/Madam

East Northants Resource Management Facility Western Extension – Deadline 5 - Requests for Information (ExQ2)

We have reviewed the Requests for Information (ExQ2) document issued 27 April 2022 and have the following comments to make:

Environmental controls - Question 2.1

Treatment facility application

Scope

This is an application to add a new treatment process for the neutralisation of hazardous and non-hazardous waste. This involves the mixing of ashy wastes such as Air Pollution Control Residues with liquid acid or alkali to adjust the pH and then mix these outputs with granular materials (hazardous and non-hazardous soils and soil like materials) to produce a waste suitable for land recovery or disposal.

The operator also proposes to increase aggregated treatment capacity at the site to 250,000 tonnes per annum and increase the storage capacity of the dredging lagoon to 12,000m³.

Issues

Neutralisation could be used to change the waste pH but the addition of the granular materials could lead to dilution of other contaminants and create a larger volumes of hazardous waste. The applicant responded to a Schedule 5 request on these issues on 29 April 2022 which is currently in consideration. We don't anticipate further information requests will be necessary.

Control mechanisms

Site infrastructure and management plans have been recently updated. Control measures are currently being reviewed considering the treatment increase proposed.

Environment Agency

Nene House (Pychley Lodge Industrial Estate),
Pychley Lodge Road, Kettering, Northants, NN15 6JQ
Email: LNplanning@environment-agency.gov.uk
www.gov.uk/environment-agency

Customer services line: 03708 506 506

Calls to 03 numbers cost the same as calls to standard geographic numbers (i.e. numbers beginning with 01 or 02).

It is not anticipated that permit conditions or monitoring requirements will change as a result of the permit variation.

Timetable

The application is currently under consideration, but we cannot comment on the timetable as it is dependent on a number of variables. The permit variation will be determined as soon as we have sufficient information to do so.

Hazardous waste landfill application

Scope

- Extend the site running north to south on the west side of the current landfill (to include an area slightly smaller than the current landfill, in the form of 9 additional phases (12 to 21));
- To request an extension of time for the leachate level limit of 5m from 2025 to 2046 for phases 1 to 11 in the current landfill, the operator has requested a limit of 1m in the extension phases;
- The infilling will continue with the same waste types, same approach to engineering and design, but we need to consider pipelines, overhead cables, culvert/drains and the potential geological issues such as the swallow hole;
- Increase in the annual tonnage from 250,00 to 300,000 tonnes per annum;
- Extend monitoring infrastructure.

Issues

Risk assessments

We are requesting a number of revisions to the risk assessments (Hydrogeological Risk Assessment Review and the Stability Risk Assessment). We are due to have a meeting next week to discuss the additional information that we may need for the risk assessments. We are about to serve a notice requesting further information on the operator.

Monitoring infrastructure

We are asking for additional monitoring boreholes and will be requesting additional information regarding particulate and asbestos monitoring.

Surface Water management

The operator has proposed a management plan, and this is in the process of being assessed. Further information will be required, and a revised plan submitted.

Control mechanisms

Management plans and operating techniques have been or are being updated, however the permit conditions are anticipated to be largely the same as they are currently, however operating techniques (including management plans) and monitoring requirements for all media will be updated in the permit.

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Timetable

We are unable to commit to a timetable as this will depend on the additional information we receive, the amount of assessment required and discussions with the operator. We are uncertain on the time it will take for the operator to produce the additional information once requested.

Infrastructure - Question 8.6

We have read the Deadline 4 submissions from Anglian Water. We would only comment on the risk to controlled waters should further information be forthcoming in terms of where the water would go in the event of a breach to the mains pipeline.

The Environmental Permit will agree final location and detailed design of each phase of the landfill prior to its use, therefore any further comments on standoff distances are likely to be made through permitting.

Should you require any additional information, or wish to discuss these matters further, please do not hesitate to contact me using the details below.

Kind regards

Keri Monger AssocRTPI



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