

2.0 INTRODUCTION

2.1 Regulation 22 Requirements

This Regulation 22 Addendum Environmental Statement (ES) is submitted by Honace Limited on behalf of Gent Fairhead & Co Limited (GFC) to both the Planning Inspectorate (PINS) and Essex County Council (ECC) in response to requests for further information regarding Environmental Statements accompanying planning applications for the integrated waste management facility (IWMF) at the former Rivenhall Airfield near Kelvedon in Essex. This Addendum ES addresses the following specific requests:

- The letter from the PINS dated 13 November 2015 (presented in Appendix 2A immediately following) regarding GFC's Appeal No APP/Z1585/W/15/3053088, in respect of an extension of time to implement its planning permission (ESS/41/14/BTE) for the IWMF at Rivenhall Airfield: and
- The letter from ECC dated 1 December 2015 (presented in Appendix 2B immediately following) referring to the above letter from the PINS and requesting that "the same information" should be submitted in support of the current application currently being considered by the Authority (namely "Section 73 and Submission of `Details" application dated August 2015 Ref No ESS/34/15/BTE).

The request by PINS dated 13 November 2015 requires an updated ES incorporating a revised Cumulative Impact Assessment (CIA) and an associated Non-Technical Summary (NTS). As will be explained, due to the passage of time following the appeal submission, this Addendum ES is relevant to both the previous planning permission Ref ESS/14/BTE and the current permission Ref ESS/55/14/BTE, which was granted on 26 March 2015 following certain modifications to some conditions.

The PINS request was received after GFC had submitted full and final details for the construction and operation of the IWMF to ECC in August 2015, the approval of which would allow GFC to commence construction. As some details of the scheme had been modified and updated in the S73 application to the ECC, this Addendum ES incorporates appropriate environmental information obtained and assessed for this latest submission (August 2015) that has yet to be determined by the ECC.

The August 2015 S73 application is essentially the project that GFC is seeking to construct, and at the time of preparing this Addendum ES, GFC is currently awaiting ECC's determination (December 2015). Nevertheless, the environmental baseline, potential impacts and mitigation measures, and CIA are relevant and appropriate for the further information required by the PINS for the Secretary of State to review the Extension of Time appeal.

In other words, this Addendum ES, CIA and NTS (as at December 2015) are essentially documents that draw upon information gathered and assessed for the fully detailed scheme. They can therefore be read in parallel with those proposals that are currently with ECC for determination in due course, in addition to providing the updated information required by PINS in relation to permission Ref No ESS/41/14/ECC.

In conclusion, on the basis that this Addendum ES is considered to be relevant to the requests made by the Planning Inspectorate dated 13 November 2015 and by Essex County Council dated 1 December 2015, exactly the same report is hereby submitted in response to both.

2.2 Current Planning Situation

GFC originally received planning permission (ESS/37/08/BTE) for the development of the IWMF at Rivenhall Airfield on 2 March 2010 from the Secretary of State following a Public Inquiry (APP/Z1585/V/2104804).

Subsequent amendments have been approved by ECC which relate to:

- Additional wording to Condition 2 as permitted by ESS/37/08/BTE/NMA dated 25 October 2012;
- An extension of time of one year to the commencement of development under Condition 1 (ESS/41/14/BTE); and
- The removal a Conditions 28 and 30 that restricted the sourcing of the IWMF's solid recovered fuel and waste paper (ESS/55/14/BTE).

The Environmental Impact Assessment that accompanied the original planning application was prepared by Golder Associates (UK) Ltd; the adequacy and robustness of which was tested through public consultation (by statutory and non-statutory consultees) throughout the planning application process and at Public Inquiry.

On 11 August 2015, GFC submitted in parallel a Section 73 (S73) application (Ref No ESS/34/15/BTE) for certain layout modifications to the IWMF and Submission of Details against all 'pre-commencement' conditions listed in the current planning permission Ref ESS/34/15/BTE, the approval of which would allow the commencement of construction. This application remains outstanding at the date of this Regulation 22 (Reg 22) Addendum ES submission. However, to support that S73 application, in July 2015 the original Environmental Assessment was reviewed by GFC's specialist consultants who reconfirmed and, where appropriate, updated their assessments to incorporate any changes proposed and resulting cumulative impacts.

The July 2015 Environmental Impact Assessment update is included in full with this submission as Appendices A2 to A9. Whilst this information post-dates the planning permission for the extension of time appeal, GFC relies upon it to provide the PINS with the confidence it seeks that the environmental effects as assessed within the ES (as updated) remain applicable to the appeal proposals. As the proposals relate essentially to the same project, the S73 application and submission of details for all pre-commencement conditions provide the most up to date assessment based on the updated environmental baseline and cumulative impacts.

2.3 Description of Development

The description of the development has been consistent since the original permission by the Secretary of State in 2010. None of the changes in planning permissions described above have required a change and neither will it be necessary in order to accommodate any future permission if granted subsequent to GFC's Section 73 application and submissions of details.

The description of development is as follows:

"An Integrated Waste Management Facility comprising: Anaerobic Digestion Plant treating mixed organic waste, producing biogas converted to electricity through biogas generators; Materials Recovery Facility for mixed dry recyclable waste to recover materials e.g. paper, plastic, metals; Mechanical Biological Treatment facility for the treatment of residual municipal and residual commercial and industrial wastes to produce a solid recovered fuel; De-Inking and Pulping Paper Recycling Facility to reclaim paper; Combined Heat and Power Plant (CHP) utilising solid recovered fuel to produce electricity, heat and steam; extraction of minerals to enable buildings to be partially sunken below ground level within the resulting void; visitor/education centre; extension to existing access road; provision of offices and vehicle parking; and associated engineering works and storage tanks, at Rivenhall Airfield, Coggeshall Road (A120) Braintree"