Wrexham CBC,
Rhosddu Road,
Wrexham, LL11 1AU

28 August 2024

Dear Sirs,

PRE-APPLICATION ADVICE REQUEST
PROPOSED DEVELOPMENT OF AN IN-VESSEL COMPOSTING (IVC) FACILITY, FORMER BEFESA SALT SLAGS SITE, FENNS BANK, Nr WHITCHURCH.

Veolia is currently considering the submission of a planning application in respect to the development of an In-Vessel Composting (IVC) facility at the former Befesa site at Fenns Bank. It is proposed that the bespoke IVC facility would process up to 50,000tpa of green and food waste and utilise the existing industrial building on site.

This pre-application advice request seeks to establish the LPA's advice in respect of the following:

- The Council's, without prejudice view, as to the general acceptability of the proposed development;
- Requirements and extent of pre-application consultation with stakeholders;
- Requirements for validation of an application and extent / scope of technical assessments likely to be required to accompany the application;
- The likelihood of the development being screened as EIA development;
- Site specific policy requirements and compliance;
- Delegated and Committee determination procedures and other matters which may influence the planning programme.

Site and Surroundings

The Site comprises the former Befesa Salt Slag facility, a hazardous waste management facility. Following closure of the facility, some elements were demolished, however, the main industrial building, several other external structures, the vehicle access, office/admin building, hard standing yard and car parking areas remain.

The Site is located to the south of Fenn's Bank Lane, approximately 3.5km to the south-west of Whitchurch. The Site lies circa. 500m to the west of the England / Wales border. The surrounding area is predominantly open countryside, largely utilised for agricultural purposes. The nearest residential property is some 100m to the south

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east of the Site. The Site is outside of the settlement boundaries, as defined by the Wrexham Local Development Plan and has no specific policy designation. It is also located within a Mineral Safeguarding Area. The Grade II Listed Barn at Fenns Old Hall, is some 350m from the site however, the heritage asset is not anticipated to be affected by the Proposed Development.

The Site is located within the Impact Risk Zone for Fenn's, Whixhall, Bettisfield, Wem & Cadney Mosses Site of Special Scientific Importance ('SSSI'), which is some 450m to the south-west. Parts of the area covered by the SSSI designation are also designated as a National Nature Reserve, Ramsar Site and Special Area of Conservation ('SAC'). The Site falls within Flood Zone A, meaning that there is considered to be at little or no risk of fluvial or coastal/tidal flooding.

Proposed Development

The building would contain the fully enclosed reception and feedstock preparation area, linked to the state of the art single stage in-vessel composting tunnels which provide full sanitisation and high temperature treatment of the waste. Externally, the proposal comprises an open air maturation area, biofilters, refining plant and ancillary minor development. The proposed site layout is shown on the enclosed drawing VES_TD_WREXIVC_100_001 RevB.

The reception, preparation area and tunnel building would be fully enclosed, operating under negative pressure with gas emissions captured and treated by the air extraction system consisting of wet scrubber and biofilters with wood media. Treated exhaust gases would be expelled via vent/stack. Fully sanitised feedstock complying with ABPR requirements would be offloaded from tunnels onto an open air maturation pad and treated for minimum 6 weeks with regular turning and moisture addition if necessary. Mature compost would be screened and supplied to local compost markets. Leachate from the IVC process would be recirculated in the composting process and any excess tankered off the site.

It is proposed that the facility would accept up to 50k tpa of green and food waste from across the Shropshire Council areas as part of long term contractual arrangements and 3rd party food and green waste will be accepted from the wider region. Veolia operates a fully integrated 32 year PFI contract with Shropshire Council which commenced in 2007, so controls all municipal collection operations and processing. Waste would be delivered in refuse collection vehicles or articulated lorries pre-bulked at existing transfer stations within the local area.

The proposed IVC facility would principally comprise:

- The main composting facility:
    - Reception and Pre-Treatment Bays - contained within the existing industrial building on site
    - Linked Composting Tunnels - contained within the existing industrial building on site

- Open-air Maturation Area.

- Ancillary equipment which is essential to the efficient operation of the composting plant consists of:
  - Refining Plant
  - Bio-scrubbers.
  - Bio-filters.
  - Process Water Tanks
  - Trommel screen.
  - Drainage

- General existing site infrastructure comprises:
  - Access Road
  - Separate administration / office building
  - Boundary fencing.
  - Lighting.
  - Weighbridge
  - Weighbridge Office
  - Landscape works
  - Staff Car Parking

The proposed development would use reliable and tested technology and the potential effects on the environment would be well known and limited in terms of their duration, magnitude and impact.

EIA Regulations

Whilst the Proposed Development is not strictly for the 'disposal' of waste, the most relevant category of the Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017 ('EIA Regulations') would be Schedule 2, Paragraph 11(b) '*other projects – installations for the disposal of waste*'. The area of the Site exceeds the set threshold of 0.5 hectares and is therefore captured by the EIA regulations.
It is not anticipated that the proposed development would result in any significant environmental effects, meaning that it would not be classified as an EIA development. However, it is proposed that this is confirmed in due course through a formal EIA Screening Opinion.

Proposed Submission Documents

In terms of the technical assessments, it is proposed to provide the following (below) and advice / agreement is sought of the scope of the required assessments-

Transport

Access to the site is via the A495 Long Lane and Fenn's Bank Lane. It is anticipated that the facility would be operational 6 days per week for 52 weeks per year. Given the anticipated volume of waste material which the facility would be designed to manage it is estimated that circa 18 vehicles per day would import material into the plant (dependent upon the season), and 10 vehicles per day would export the resultant compost product and byproducts. 2x Automatic Traffic Counts surveys would be undertaken to establish the nature of the vehicle movements along Fenn's Bank Lane to inform an assessment of the suitability of the existing junction. The application would be supported by a Transport Statement which confirms the number of vehicles arising from the development and mitigation measures, where appropriate, to minimise the effect of the development.

Noise

The noise emitted by the operating IVC would be relatively low, limited solely to that created by plant turning compost within the maturation area. All other operations would be undertaken inside the tipping hall and process tunnels. The greatest noise source is likely to be from vehicles off-loading material, turning maturing compost and moving material around the different constituent parts of the site. Given the remoteness of the site from sensitive receptors, it is considered that noise from the facility would not be significant. Nevertheless, the application would be supported by a noise assessment.

Air Quality (Odour, Dust and Bio-aerosol)

Waste material transported into the site would be off-loaded within the tipping / reception hall, where it would be shredded in preparation for transfer to the process tunnels. This would be undertaken under negative pressure to ensure that dust and odour potentially generated by tipped and shredded material is retained within the building and does not migrate onto adjoining land. The IVC operations would be undertaken within a building which would operate under negative pressure and air from within the IVC, including the enclosed composting process itself, would pass through a scrubber and bio-filters prior to release to the atmosphere. All operations would be industry standard and would be regulated by Natural Resources Wales through an Environmental Permit. The risk of public exposure to bio-aerosols from enclosed composting facilities is considered to be very low. The composting process itself is designed to destroy any pathogens. The air quality effects are well known and controllable through good practice design and management.

It is not anticipated that a detailed quantitative assessment would be necessary on this occasion and therefore it is proposed to provide a qualitative assessment of the potential impacts on air quality, considering construction dust, odours and bioaerosols and HGV emissions.

The Initial Qualitative Assessment would include:

- A review of development design and in-design mitigation;

• Liaison with the EHO and agreement of proposed scope of work;
• A review of Environmental Permit and regulatory requirements;
• The identification of potentially sensitive human and ecological receptors in vicinity of the site and haulage routes;
• A review of recent Wrexham & Shropshire Councils air quality reports and monitoring data and Defra background data;
• A review of baseline weather conditions;
• Liaison with transport consultants, review of proposed HGV routing and movements data;
• A qualitative construction dust assessment;
• A qualitative odour and bioaerosol assessment – considering orientation and distance to nearby receptors;
• A vehicle emissions assessment – review of HGV movements and routing; screening assessment;
• The provision of outline mitigation measures;
• The identification of further detailed assessment requirements;
• The provision of draft and final report.

Ecology / Landscape

The site is previously developed land and the proposed external infrastructure would be sited within the existing hardstanding that surrounds the building. A Phase 1 Habitat Survey will be undertaken and subject to no further surveys being required, the results of the Phase 1 Habitat Survey will be written up into an Ecological Appraisal Report. This would also provide details of the desk study and any outline mitigation design and net benefit opportunities. The report would also include a Green Infrastructure Statement ('GIS') in line with Planning Policy Wales, which would detail how proportionate biodiversity net gain could be incorporated.

Drainage / Flood Risk

As the area of construction exceeds 100sqm, it is understood that a drainage scheme would need to be submitted for SAB approval, in line with national legislation. It is proposed that in this case a drainage scheme is prepared and submitted as part of the planning application and for SAB approval, simultaneously.

In respect to the proposal above, following internal consultations, I would welcome the opportunity to discuss the proposals in greater detail and the form and content of a subsequent application. Should you need any further information / clarification in the meantime please contact me on the number or email below.

Yours sincerely,
for and on behalf of Veolia ES (UK) Ltd.

JT Woodhall

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