

[REDACTED]

From: [REDACTED]
Sent: 24 March 2021 12:31
To: [REDACTED]
Subject: RE: Waste Knot Application

Categories: Egress Switch: OFFICIAL – not protectively marked
Switch-MessageId: 3059b076af5b49bd91404b27f938536f

Hi [REDACTED]

These have been made by local residents. We do not publish representations online for a number of reasons (hence me sending them through) The two gentlemen concerned have framed them as "queries" and request for clarification as they build up to a full blown reps. I have not bothered to send on some of the wilder queries - such as the argument that this should be EIA development under class 3(e) storage of fossil fuels because most of the SRF is plastics which are derived from fossil fuel.

In response to my query of one of these gentlemen as to whether that I had all of their questions, I received this:

"I expect to have more as I am only 1/3 through all of the papers submitted. I am trying to get any further questions/comments to you in good time but as you are no doubt aware, this development proposal could have a long lasting and possible detrimental effect on Rockcliffe, Cargo, Harker and the existing and new Cringledyke housing development; notwithstanding the possible environmental impact and the potential huge increase in HGV traffic along minor "C" classified roads. It needs careful scrutiny and warrants a detailed examination of the facts both included and/or missing for some reason, and an examination of facts/ detail that are needing further clarification."

I think as I have mentioned there are local sensitivities regarding waste development and I anticipate potentially time consuming FOI/ EIR requests in due course.

Feel free to give me a call.

Regards

[REDACTED]
Planning Officer | Planning Services
Economy & Environment | Cumbria County Council County Offices | Kendal | LA9 4RQ

m [REDACTED]
e [REDACTED]@cumbria.gov.uk

www.cumbria.gov.uk

Please note I only work 4 days a week and there may be a short delay before I get back to you.

-----Original Message-----

From: [REDACTED] <[REDACTED]@elgplanning.co.uk>
Sent: 24 March 2021 11:19
To: [REDACTED] <[REDACTED]@cumbria.gov.uk>
Subject: RE: Waste Knot Application

Hi [REDACTED]

I am due to sit down with the client shortly and go through all these. Where do these comments feature online as I can't see them when I had a look before?

Kind Regards

[REDACTED], MRTPI
Senior Planner

-----Original Message-----

From: [REDACTED] <[REDACTED]@cumbria.gov.uk>

Sent: 24 March 2021 11:14

To: [REDACTED] <[REDACTED]@elgplanning.co.uk>

Subject: FW: Waste Knot Application

Hi [REDACTED],

Please see slightly edited comments below... There is reasonable concerns about the number and size of stacks and their omission from them plans / elevations.

Please can you explicitly assure me that there are no combustion processes proposed as part of the development (and by extension confirm the energy source for the dryers.)

[REDACTED]
Planning Officer | Planning Services
Economy & Environment | Cumbria County Council County Offices | Kendal | LA9 4RQ

m [REDACTED]
e [REDACTED]@cumbria.gov.uk

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-----Original Message-----

Several extracts from the planning documents suggest there may be other emissions:

As part of the Environment Agency (EA) permit application, emissions from the stack will be modelled and demonstrated to have negligible impact;

Please can you ask the applicant what emissions will be modelled.

Odour emitted from dryer stacks during the drying process - Water vapour has no odour.

Waste Knot includes the Carlisle plant as second on a list of eight such pelleting plants in the UK (<https://wasteknotenergy.com/sites/>). I note that with regard to the Middlesbrough plant, the company submitted the following to the Environment Agency:

There are two proposed driers at the site which will be heated through use of gas burners which require 6,100 kW. Despite exceeding the 1 MWth trigger threshold of the Medium Combustion Plant (Directive 2015/2193/EU) ('MCPD') as set out in Schedule 25A of The Environmental Permitting (England and Wales) Regulations 2018 (as amended), due to the products of combustion being used for direct heating the driers are therefore not considered to need to meet the requirements of the MCPD.

If the proposed plant is similar to the Middlesbrough plant, it can be expected to burn a considerable quantity of natural gas resulting in significant emissions. The Middlesbrough plant burns as much natural gas as a Medium Combustion Plant. Since the Middlesbrough plant is not considered to meet the requirements of a Medium Combustion Plant, it is not subject to Medium Combustion Plant regulations - including any Medium Combustion Plant regulations relating to emissions. The emissions to air from such a plant can therefore be expected to be similar or greater than those of a Medium Combustion Plant.

It is of course possible that the Carlisle plant may be different from the Middlesbrough plant, but, as yet, I have seen no information verifying that the Carlisle plant will use a source of heat for the dryers with no emissions. The proposed stacks would suggest there are pollutants that need to be dispersed.

2nd set of comments:

I have attempted to scrutinise the Landscape and Visual Impact Assessment document submitted on behalf of WKE (Carlisle) Ltd by TGP Landscape Architects (North) Ltd in relation to the planning application ref; 1/21/9002.

I have found fundamental errors/omissions which materially affects almost all of the conclusions reached by this document.

Unless the document is corrected either by TGP or WKE (Carlisle) Ltd, the document fails to meet the required standard for technical and visual analysis.

The omission(s) concern the exhaust stack and the other stacks, together with the plumes from the said stacks that are largely water based (according to the various submissions including in this document). The stacks and the plume(s) need to be included as they will have a visual effect from a very large number of locations within the 5 km radius of the development.

It is not sufficient to limit this Landscape and Visual Assessment document to the roofline of the proposed development buildings. As it stands, the document gives a false indication of the impact that this development has within the 5km area, and even further possibly.

Therefore, could you ask WKE (Carlisle) Ltd and the producer of the report TGP Landscape Architects (North) Ltd the following questions;

1. What is the height of the exhaust stack?
2. What is the height of the other stacks mentioned and could the number be confirmed for each building?
3. What height will the water based plume from the exhaust stack reach and what height will any other plumes from the other stacks reach?
4. Will a new and revised Landscape and Visual Assessment document be submitted that includes the impact of the exhaust stack and water based plume and the other remaining stacks and any associated plume(s)?
5. Could it be confirmed that the existing Landscape and Visual Assessment submitted with the application is meaningless if it's findings and conclusions in all aspects are based solely on the proposed roof heights of the buildings as specified?

& similar comments previously sent through...

number of questions. Please request answers from the applicant and let me know their reply:

1. I notice that the odour management plan refers to "dryer stacks" and the Landscape and Visual Impact Appraisal refers to "emissions from the drier and exhausted via the stack". The Air Quality assessment refers to "nine stacks". Please explain and/or correct the apparent inconsistency of the reference to "stack" in the "Landscape and Visual Impact Appraisal".

(To ensure consistency between the documents and avoid ambiguity).

2. Where are the stack or stacks shown on the elevations diagram(s)?

(To ensure consistency between the diagrams and the documents and to avoid ambiguity)

3. How high are the stacks?

(Because visual impact of the facility is a material planning consideration)

4. The Air Quality Assessment says "It should be noted that the proposed facility will not include a Combined Heat and Power (CHP) unit. As such, emissions associated with combustion have not been considered within this assessment." Since the application documents refer to "dryer stacks", "emissions" and suggest combustion may be taking place, a number of questions arise:

i) What fuel is the plant combusting?

(Because air quality and greenhouse gas emissions are material planning considerations, and because, depending on the fuel type, transport of the fuel may impact the highways network)

ii) What is the maximum annual fuel throughput?

(Because air quality and greenhouse gas emissions are material planning considerations)

iii) How is this fuel to be transported?

(Because, if the fuel is transported by road, impact on the highways network is a material planning consideration)

iv) What are the expected emissions (including greenhouse gas emissions) from the combustion?

(Because air quality and greenhouse gas emissions are material planning considerations)

v) What is the expected impact on local air quality (inclusive of vehicle emissions and fugitive emissions)?

(Because air quality is a material planning consideration)

vi) What is the cumulative impact on local air quality of the facility in combination with other new and planned nearby sources of air pollution?

(Because air quality is a material planning consideration)

vii) How is the plant minimising greenhouse gas emissions and what alternatives have been considered?

(Because greenhouse gas emissions are a material planning consideration)

viii) What is the expected impact on the nearby River Eden SAC, e.g. from increased nitrogen deposition?

(Because the impact on the SAC/SSSI is a material planning consideration)

5. The "Landscape and Visual Impact Appraisal" refers to pelletized SRF as a "low carbon substitute fuel for energy". Since the facility appears to be burning a fuel in one or more dryers in order to make the pelletized SRF, and since the SRF can be expected to include a significant proportion of plastic derived from fossil fuel materials, and since plastics do not readily decompose and release methane and carbon in landfill sites, please provide the supporting evidence to show that the pelletized SRF can be considered a "low carbon substitute fuel for energy".

(Because greenhouse gas emissions and moving to a low carbon economy are material planning considerations)

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