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Reference No. 14-05-1402.255

Ms Claire Tomalin
Essex County Council
Minerals & Waste Planning
Planning & Environment
E3 County Hall
Chelmsford
Essex
CM1 1QH

PLANNING APPLICATION FOR THE INSTALLATION OF AN ABSTRACTION MAIN FROM THE RIVER BLACKWATER TO THE INTEGRATED WASTE MANAGEMENT FACILITY, RIVENHALL AIRFIELD, ESSEX

Dear Ms Tomalin,

On Gent Fairhead & Co Limited's behalf we submit the following application and Environmental Supporting Statement for the installation of an abstraction main from the River Blackwater to the Integrated Waste Management Facility (IWMF) site (Essex County Council Planning Permission No 334/15/BTE). The application relates to the existing licence that is held by Gent Fairhead & Co Limited (GFC) Serial No. AN/037/0031/001/R01 to abstract 250,000 m³ of water per year from the River Blackwater during the months November to March inclusive.

Whilst abstraction and discharge licences are issued and regulated by the Environment Agency (EA), in the case of the River Blackwater at Bradwell, the largest abstractor is the Essex & Suffolk Water Company (E&SW) owned by Northumbrian Water Limited (NWL). This is because, in order to ensure there is sufficient potable water running into its reservoirs at Abberton and Hanningfield, E&SW operates, in conjunction with the EA, a scheme of transfer known as The Ely Ouse to Essex Transfer Scheme (EOETS) that transfers water from the Ouse by man-made channels and pipelines to the headwaters of the Rivers Stour and Blackwater.

In joint discussions with E&SW and the EA over recent years, it has been made clear to GFC that both parties would need to agree any scheme of abstraction for GFC because of the priority and scale and of the E&SW licence. However, it has been confirmed informally by both parties that GFC's abstraction requirements should be feasible in principle, subject to detailed assessment, application and approval.

The option to apply for a discharge licence always exists and is currently being considered and designed by GFC based on its discussions with the EA and the E&SW. In due course an abstraction and discharge licence application will be made to the EA, and will be subject to their detailed assessment and ultimate approval.

Following completion of the detailed design for the IWMF, GFC proposes to make a separate and formal application for the alternative abstraction and discharge system from/to the River Blackwater.



However, given the timescales for the determination and assessment of any future abstraction and discharge application, for operational purposes this application seeks solely to relate to the existing abstraction licence Serial No. AN/037/0031/001/R01.

For the avoidance of doubt, at any future point in time, GFC intends to own and operate only one abstraction and/or discharge licence.

Background

Water is required by the IWFMF to operate the Anaerobic Digestion (AD) plant and the Mechanical Biological Treatment (MBT) Plant, and as boiler water for the Combined Heat and Power (CHP) Plant, and the Pulp Plant. In addition, small quantities of water are required for operation of the Material Recycling Facility and for the welfare facilities at the IWFMF.

Mains water would be used to service the IWFMF's offices, workshops, welfare facilities and the boiler water for the CHP plant. A small 150 mm diameter mains water supply currently serves the Woodhouse Farm complex and the old World War II hanger and the mains line still passes through the IWFMF footprint area; however, this is currently programmed for diversion by minor local works. The remaining water requirement will be secured by abstraction from the River Blackwater, followed by storage in lagoons formed by the IWFMF construction and the mineral extraction restoration proposals, and finally by recirculation of water on site.

The requirement for water and the disposal of water at site was considered in detail, as part of the original IWFMF planning application and its current permission No ESS/34/15/BTE as part of the detailed site design.

The Environmental Impact Assessment (EIA), which accompanied the original IWFMF planning application and subsequent variation ESS/34/15/BTE, considered abstraction of water from the River Blackwater on the basis that the efficient operations at the proposed Wastewater Treatment Plant (WWTP) within the IWFMF would not require discharge of return effluent to the River. It continues to be the case that the River Blackwater will be used as the primary water source of non-potable water for industrial use at the IWFMF site. At present, there is no discharge licence or permission to pump treated effluent into the river.

Abstraction and discharge licences are issued and regulated by the EA. GFC holds an existing licence from the EA (Serial No. AN/037/0031/001/R01) to abstract 250,000 m³ of water per year from the River Blackwater during the months November to March inclusive. The licence was originally issued in 2009 and renewed in 2016; it states the following conditions:

- *“water abstraction at NGR TL 8343 2223 from a pumping sump with two pumps with a combined capacity of not more than 100l/sec (NOTE: this point is on the River Blackwater where the old access road to the former Blackwater Aggregates Coggeshal Pit quarry crosses the River Blackwater ie in GFC's land ownership/control);*
- *for the purpose of filling reservoirs for the subsequent purpose of process water for waste treatment, processing and recycling;*
- *the maximum quantity of water to be abstracted is not to exceed:*
 - *360 m³/hr;*
 - *8,640 m³/day; and*
 - *250,000 m³/yr.*
- *no abstraction is permitted when the flow in the River Blackwater (as gauged by the Agency) at Appleford Bridge gauging station (NGR TL 845 158) is equal or less than 1,309l/sec (1.309 m³s⁻¹); and*

- *no abstraction shall take place until the Licence holder has provided a storage facility, capable of storing at least 250,000 m³ of water which is constructed or lined so that it remains impermeable.”*

Planning and Environmental Assessment of the Abstraction Pipeline

GFC's abstraction licence (Serial No. AN/037/0031/001/R01) states that the Purpose of Abstraction is for “filling reservoirs for the subsequent purpose of process water for waste treatment, processing and recycling”. In the original planning application, water pipelines were indicated in service trenches in the cross-sectional detail of the proposed access road. The environmental assessment of the construction of the access road inherently considered the provision of the pipeline. Where the pipeline may not have been laid on the access road alignment, GFC has control over two mineral quarry workings between the IWMF and the River Blackwater (namely Bradwell Quarry and Coggeshall Pit) such that the abstraction pipeline could be laid within disturbed and restored mineral workings, thereby not leading to any increased environmental impact.

Abstraction Pipeline from the Existing Coggeshall Abstraction Point

Drawings 101 to 113 indicate the proposed line, location and details of the proposed water main and its associated infrastructure from the Coggeshall Bridge Abstraction point to the IWMF site. The existing river abstraction license location (there is currently no abstraction hardware at present) is at the footbridge over the River Blackwater on the old access road (Public Footpath No 72/33) to the former Coggeshall Sand & Gravel Pit. Through its shared ownership of Blackwater Aggregates, GFC would be able to route the pipeline from this abstraction point to the IWMF through land effectively under its control.

Initially, the pipeline would pass beneath the old concrete access road into Coggeshall Pit. It would then run south of the public footpath (No 22 - The Essex Way) along the northern edge to the northeast corner of Coggeshall Pit from where it will turn sharp left to head south and then southwest just inside the western edge of Coggeshall Pit. GFC's land control would permit the pipeline to be placed just within the restored workings of the quarry or, if practicalities do now allow, just outside in the edge of the virgin agricultural field to the west.

Passing under Cuthedge Lane, the pipeline would continue southwestwards inside the edge of the agricultural field that surrounds Herons Farm, and then straight across restored agricultural quarry in the old mineral extraction area Site R, avoiding areas of new planting, proposed landscaping and hedgerows by skirting around these features and the existing silt ponds, until it reaches the proposed access road to the IWMF, just to the southeast of Maxey's Spring. From this point, the pipeline would be laid within the construction of the new access road up to its connection into the IWMF. On this basis, 1.7 km of pipeline would be laid in restored agricultural fields prior to its inclusion within the new access road.

The water main will be installed within a trench 1 m in width to the existing licenced water abstraction point. During the excavation of the trenches, arisings will be stored adjacent to the working area(s) for reuse as backfill. Across areas of agricultural or restored land sub-soil will be carefully stored separately from the topsoil for reuse and reinstatement purposes. Particular attention will be paid to the preservation, maintenance and reinstatement of agricultural land drainage systems.

From the Coggeshall Bridge Abstraction point to the existing IWMF site boundary, 1.7 km of pipeline would be laid in restored agricultural fields prior to its inclusion within the IWMF access road. The total planning application area, including the temporary storage of the excavated arisings adjacent to the trench along the line of the water main will be 9,775 m² (<1 ha).

Policy Considerations

The IWMF is an implemented planning permission. The environmental impact of the IWMF and cumulative impacts associated with its development have been subject to locational and environmental review against policies of the Essex and Southend Waste Local Plan (WLP) adopted

2001, Mineral Local Plan (MLP) adopted 2014, the Braintree District Council Local Development Framework Core Strategy 2011 (BCS) and Braintree District Local Plan Review 2005 (BDLPR).

With reference to the installation of the abstraction main from the River Blackwater to the IWMF site, the proposed development has been considered against the following Policies:

National Planning Policy Framework

The National Planning Policy Framework (NPPF) was published on 27 March 2012 and sets out the Government's planning policies for England and how these are expected to be applied. The NPPF highlights that the purpose of the planning system is to contribute to the achievement of sustainable development. It goes on to state that there are three dimensions to sustainable development: economic, social and environmental. The NPPF places a presumption in favour of sustainable development.

The installation of an abstraction main from the River Blackwater to the Integrated Waste Management Facility will support in the recovery, recycling and treatment of waste, through the use of a closed loop water management system. The application uses the existing licence that is held by Gent Fairhead & Co Limited (GFC) Serial No. AN/037/0031/001/R01 to abstract 250,000 m³ of water per year from the River Blackwater during the months November to March inclusive.

Waste Local Plan

On the 10 June 2016, Essex and Southend-on Sea Councils submitted their Replacement Waste Local Plan (RWLP) to the Secretary of State for independent examination. Hearing sessions (or examination in public) for the emerging RWLP are programmed from Tuesday 27 September 2016 to Thursday 7 October 2016. The IWMF is a Site Allocated for Biological and Other Waste Management Capacity operations within the RWLP and is presented on Map 16 IWMF 2 – Rivenhall.

Whilst the current Waste Local Plan is not considered up to date, the overarching principles of the Waste Hierarchy and the Proximity Principle do form part of its core emphasis. The installation of an abstraction main from the River Blackwater to the Integrated Waste Management Facility site has been considered against existing Waste Policy:

Policy W4A – Flooding and surface water

Water will be abstracted from a licenced location (Serial No. AN/037/0031/001/R01). Given the transient nature of the water main installation works and the limited influence that they will have on surface water and flood risk potential, the works will have a negligible effect on surface water resources or the potential for flood risk.

Policy W4B – Surface and groundwater

The installation of the water main and its associated infrastructure would not result in an unacceptable risk to the quality of the surface or groundwater or the impediment of groundwater flow.

Whilst there is no existing evidence of ground contamination arising as a consequence of historical quarrying activities a 'watching brief' will be maintained during site clearance works to determine the presence of previously unidentified zones of soils or groundwater contamination.

As the construction process takes place in a shallow trench at the ground surface, due to the thickness of the Boulder Clay (either insitu or as restoration soils) overlying the sands and gravels, and the London Clay overlying the Chalk, the potential impact on groundwater in the Sands and Gravels or the Chalk is considered to be negligible.

Policy W4C – Highways

No road closures or traffic management measures are required to install the abstraction pipeline beneath Cuthedge Lane. The impacts associated with the works would be low.

Where the pipeline crosses under Cuthedge Lane it will be installed using trenchless technologies to pass under the road. As such, no road closures or traffic management measures should be required, and there would not be a significant increased impact on traffic.

Temporary access for construction plant to the proposed line of the water main would be made via the existing established accesses to Coggeshall Pit and/or Bradwell Quarry to and from the A120.

Policy W8A – Preferred locations for waste

The installation of an abstraction main from the River Blackwater to the IWMF site will support the integrated waste recycling, recovery and treatment operations at the Rivenhall Site. The water will be supplied by an existing licence that is held by Gent Fairhead & Co Limited Serial No. AN/037/0031/001/R01 to abstract 250,000 m³ of water per year from the River Blackwater during the months November to March inclusive.

The abstraction licence states that the Purpose of Abstraction is for *“filling reservoirs for the subsequent purpose of process water for waste treatment, processing and recycling”*. In the original planning application, water pipelines were indicated in service trenches in the cross-sectional detail of the proposed access road. The environmental assessment of the construction of the access road inherently considered the provision of the pipeline. Where the pipeline may not have been laid on the access road alignment, GFC has control over two mineral quarry workings between the IWMF and the River Blackwater (namely Bradwell Quarry and Coggeshall Pit) such that the abstraction pipeline can be laid within disturbed and restored mineral workings, thereby not leading to any increased environmental impact.

Policy W10E – Development control criteria

The installation of the water main from a licenced abstraction position on the River Blackwater to the Integrated Waste Management Facility will not affect the local environment, agricultural land holdings, amenity of local residents or Public Rights of Way.

Noise and nuisance impacts associated with the works will be low, will only apply during normal working hours and will be transient and short term in nature.

The water pipeline will be routed within the verge of the IWMF site access road, across areas of restored quarry workings, beneath the public highway (Cuthedge Lane) or along agricultural field boundaries. The land use impact associated with these works on agricultural or highway assets will be Low and short term in nature.

There will be no need to divert or alter the route of any public footpaths whilst the pipeline is being installed.

Policy W10F – Hours of working

Working hours will be in line with the existing IWMF planning permission and carried out between 07:00 and 19:00 hours Monday to Sunday.

Policy W10G – Safeguarding/improvements to Public Rights of Way

There will be no need to divert or alter the route of any public footpaths whilst the pipeline is being installed. In line with industry best practice, given the limited duration and transient nature of the works, a standard road plate crossing point will be established to maintain access at all times.

In carrying out the water main installation works a review will be made of the existing alignment of Coggeshall Pit's fence line adjacent to the River Blackwater and the Essex Way, with a view to adjusting the alignment of the fence line to improve access along the public right of way.

Braintree Development Plan

The New Braintree District Local Plan was approved for consultation by Council on the 20 June 2016. The New Local Plan will include all major planning policy for the District in a single document and will need to meet the requirements of the National Planning Policy Framework (NPPF). Once complete it will replace both the Core Strategy (2011) and the Local Plan Review (2005).

The current adopted Braintree district development plan is made up of a number of documents, including the Local Plan Review 2005 and the Core Strategy 2011.

Policy CS5 - The Countryside

The proposed water main works will comprise the excavation and installation of one 90 mm abstraction main within a 1 m wide and 1.275 m deep trench to an existing licenced abstraction position Serial No. AN/037/0031/001/R01 within the former Coggeshall Pit quarry. There will be no above ground structures or buildings. The transient nature of the works will minimise impacts associated with its development on the local landscape.

Low levels of visual impact would be experienced only during the construction phase of the water main. Once in operation and reinstatement works have become established, the connection would be barely perceptible.

Policy CS8 - Natural Environment and Biodiversity

Water will be abstracted from a licenced location (Serial No. AN/037/0031/001/R01) under an existing bailey bridge near Coggeshall Pit, and the water main will be installed within the footprint of the former Coggeshall Pit access road. Low levels of visual impact would be experienced only during the construction phase of the water main. Once in operation and reinstatement works have become established, the connection would be barely perceptible.

The water pipeline will be routed within the verge of the IWMF site access road, across areas of restored quarry workings, beneath the public highway (Cuthedge Lane) or along agricultural field boundaries. The land use impact associated with these works on agricultural or highway assets will be Low and short term in nature.

Policy RLP 36 - Industrial and Environmental Standards

The installation of the water main from a licenced abstraction position on the River Blackwater to the Integrated Waste Management Facility will not affect the local environment, agricultural land holdings, amenity of local residents or Public Rights of Way.

Policy RLP 54 - Transport Assessments

No road closures or traffic management measures are required to install the abstraction pipeline beneath Cuthedge Lane. Where the pipeline crosses under Cuthedge Lane it will be installed using trenchless technologies to pass under the road.

Temporary access for construction plant to the proposed line of the water main would be made via the existing established accesses to Coggeshall Pit and/or Bradwell Quarry to and from the A120.

Policy RLP 62 - Development Likely to Give Rise to Pollution, or the Risk of Pollution

The installation of the water main from a licenced abstraction position on the River Blackwater to the Integrated Waste Management Facility will not give rise to pollution or the risk of pollution.

Whilst there is no existing evidence of ground contamination arising as a consequence of historical quarrying activities a 'watching brief' will be maintained during site clearance works to determine the presence of previously unidentified zones of soils or groundwater contamination.

Policy RLP 71 - Water Supply, Sewerage and Land Drainage

Water will be abstracted from a licenced location (Serial No. AN/037/0031/001/R01).

Particular attention will be paid to the preservation of agricultural land drainage systems. Land drainage in each field will be carefully inspected and recorded. All drains severed by the trenching operations will be identified and an appropriate method of reinstatement discussed and agreed with the landowner. Furthermore, standard subsoil and topsoil management will apply to mitigate any impact on the field margins.

Policy RLP 72 - Water Quality

The installation of the water main and its associated infrastructure would not result in an unacceptable risk to the quality of the underlying groundwater or surface water.

Policy RLP 78 - Countryside

The proposed water main works will comprise the excavation and installation of one 90 mm abstraction main within a 1 m wide and 1.275 m deep trench to an existing licenced abstraction position Serial No. AN/037/0031/001/R01 within the former Coggeshall Pit quarry. There will be no above ground structures or buildings. The transient nature of the works will minimise impacts associated with its development on the local landscape.

Policy RLP 79 - Special Landscape Areas

Water will be abstracted from a licenced location (Serial No. AN/037/0031/001/R01) under an existing bailey bridge near Coggeshall Pit, and the water main will be installed within the footprint of the former Coggeshall Pit access road. Low levels of visual impact would be experienced only during the construction phase of the water main. Once in operation and reinstatement works have become established, the connection would be barely perceptible.

Policy RLP 80 - Landscape Features and Habitats

Low levels of visual impact would be experienced only during the construction phase of the water main. Once in operation and reinstatement works have become established, the connection would be barely perceptible.

By utilising existing poor ground such as quarry areas, the margins of agricultural land or within roads, few ecological impacts are expected. However, an ecological clerk of works will be on call and present when working in the most sensitive areas. The ecological impact associated with the installation of the water main will be Low and short term in nature.

Policy RLP 83 - Local Nature Reserves, Wildlife Sites and Regionally Important Geological/Geomorphological Sites

Water will be abstracted from a licenced location (Serial No. AN/037/0031/001/R01) under an existing bailey bridge near Coggeshall Pit, and the water main will be installed within the footprint of the former Coggeshall Pit access road. Low levels of visual impact would be experienced only during the construction phase of the water main. Once in operation and reinstatement works have become established, the connection would be barely perceptible.

Policy RLP 86 - River Corridors

Water will be abstracted from a licenced location (Serial No. AN/037/0031/001/R01) under an existing bailey bridge near Coggeshall Pit, and the water main will be installed within the footprint of the former Coggeshall Pit access road. Low levels of visual impact would be experienced only during the construction phase of the water main. Once in operation and reinstatement works have become established, the connection would be barely perceptible. The character, nature conservation importance or recreational importance of the River Blackwater will be largely unchanged.

Policy RLP 87 - Protected Lanes

Low levels of visual impact would be experienced from Cuthedge Lane during the construction phase of the water main. Once in operation and reinstatement works have become established, the connection would be barely perceptible.

Where the pipeline crosses under Cuthedge Lane it will be installed using trenchless technologies to pass under the road. As such, no road closures or traffic management measures should be required, and there would not be a significant increased impact on traffic.

Policy RLP 88 - Agricultural Land

The water pipeline will be routed within the verge of the IWMF site access road, across areas of restored quarry workings, beneath the public highway (Cuthedge Lane) or along agricultural field boundaries. The land use impact associated with these works on agricultural or highway assets will be Low and short term in nature.

Policy RLP 105 - Archaeological Evaluation

Based on all known archaeological information within the IWMF's site boundary, the adjacent quarry and along the proposed route for pipeline connection, the impact of the water main on historic resources is negligible.

Policy RLP 106 - Archaeological Excavation and Monitoring

The recording and reporting of any archaeological remains under a watching brief alongside the River Blackwater will continue to expand and improve the existing knowledge and understanding of the site's historic setting within the wider landscape.

Environmental Supporting Statement

To support the application for the installation of an abstraction main from the River Blackwater to the IWMF site boundary, an Environmental Supporting Statement has been prepared which assesses the impacts of the proposed works on the local environment.

Yours sincerely

HONACE LTD

Data Protection Act



Steven Smith
Director

SS/DB

CC: