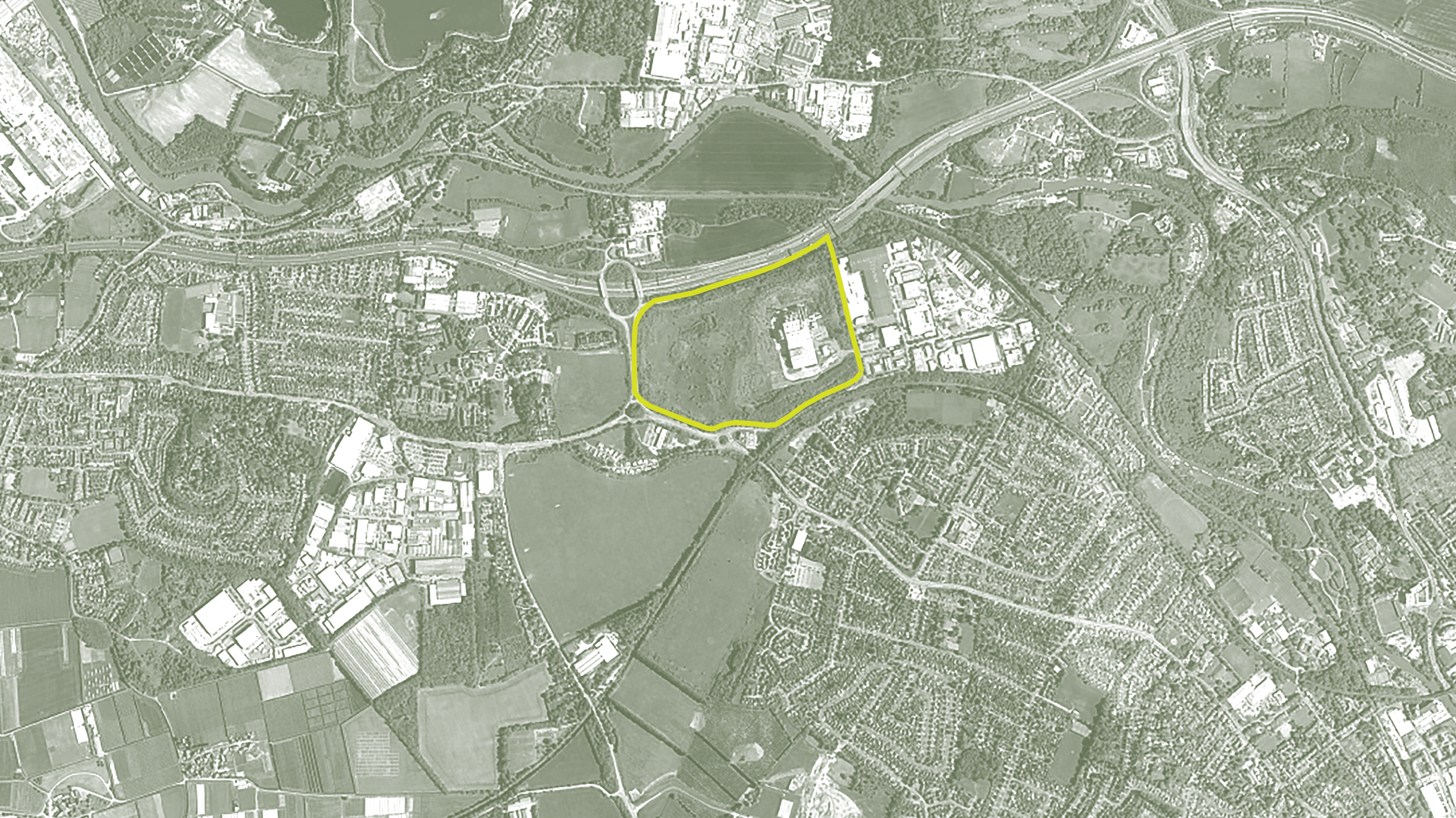


Allington

Proposed extension to the existing Allington Integrated Waste Management Facility

Statutory consultation
20 July 2020 – 14 September 2020





This booklet outlines our proposals to extend the existing Allington Integrated Waste Management Facility (IWMF).

We wrote to you in October last year to introduce our draft proposals, which are to add a new waste treatment line to the existing Energy from Waste (EfW) facility.

Since then, we have considered the feedback we received at that time, continued our environmental impact assessments, and updated our proposals taking all this into consideration.

We are now seeking your views on our detailed design proposals and the preliminary outcomes of our environmental impact assessments.

This is a statutory consultation process that we are required to carry out by the Planning Act 2008 because the project is classified as a Nationally Significant Infrastructure Project (NSIP). Following the consultation, we will take into consideration all the feedback received on time through this process as we develop a final scheme. We will then prepare and submit an application for a Development Consent Order (DCO). The planning process for the application will be managed by the Planning Inspectorate (PINS) on behalf of the relevant Secretary of State.

As a result of the current COVID-19 pandemic, we are consulting knowing the importance of protecting everyone's health and this means we can't hold face to face meetings. This means we're asking for your views in ways which may be different to our last consultation.

Taking this into account, we've thought carefully about ways to ensure that everyone across the community can respond to the information on the detailed scheme proposal we will make available through a revised approach to consultation during the COVID-19 pandemic. We explain how to find out more about the scheme and respond to the consultation later in this booklet.

Allington Site Boundary



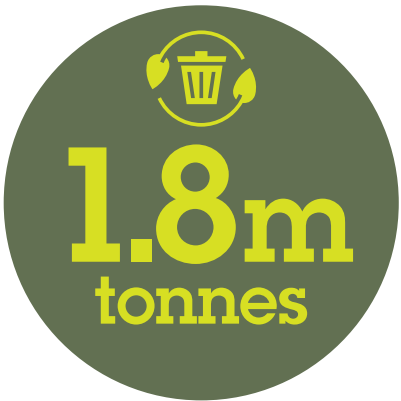
About us

The proposed extension to the Allington IWMF is being brought forward by FCC Environment (UK) Ltd.

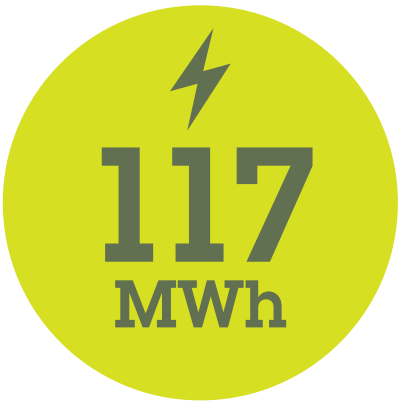
FCC is one of the UK’s leading resource and waste management companies. Our approach is to minimise the amount of waste that ends up in landfill by transforming it into valuable resources where possible.

We became FCC in 2012 and currently employ around 2,325 people across the UK. We operate a range of waste management facilities including Material Recycling Facilities, Household Waste Recycling Centres, Energy from Waste plants and landfill sites.

Each year, FCC recycles circa 1.8 million tonnes of waste and generates more than 117MWh of green energy – and we have ambitions to increase this by way of increasing recycling and providing additional residual waste treatment capacity.



of waste recycled
each year



of green energy
generated



The planning process

The application for the proposed extension will require a DCO. This is a process established by the Planning Act 2008. The proposed extension is classified as a NSIP because of its generating capacity (over 50MW electrical generation).

NSIPs are major developments which require development consent to be granted by the relevant Secretary of State – in this case, the Secretary of State for Business, Energy and Industrial Strategy (BEIS).

DCOs are governed by a fixed, statutory process which requires us to consult with the local community and to carry out environmental impact assessments to support the consultation process. It also provides a fixed role for local authorities and means we will be following a statutory, clear process to develop the scheme.

We carried out a non-statutory consultation on the proposals during October and November 2019. We are now carrying out this further, statutory, consultation to fulfil the requirements of the Planning Act 2008. Our next step following the close of the consultation will be to consider all the feedback we receive and, where appropriate, revise the scheme accordingly. We will then submit our DCO application to PINS.

We have set out full details of how we intend to meet the requirement to consult with the community in a document called a Statement of Community Consultation (SoCC). Details of how to view the SoCC are provided later in this booklet.

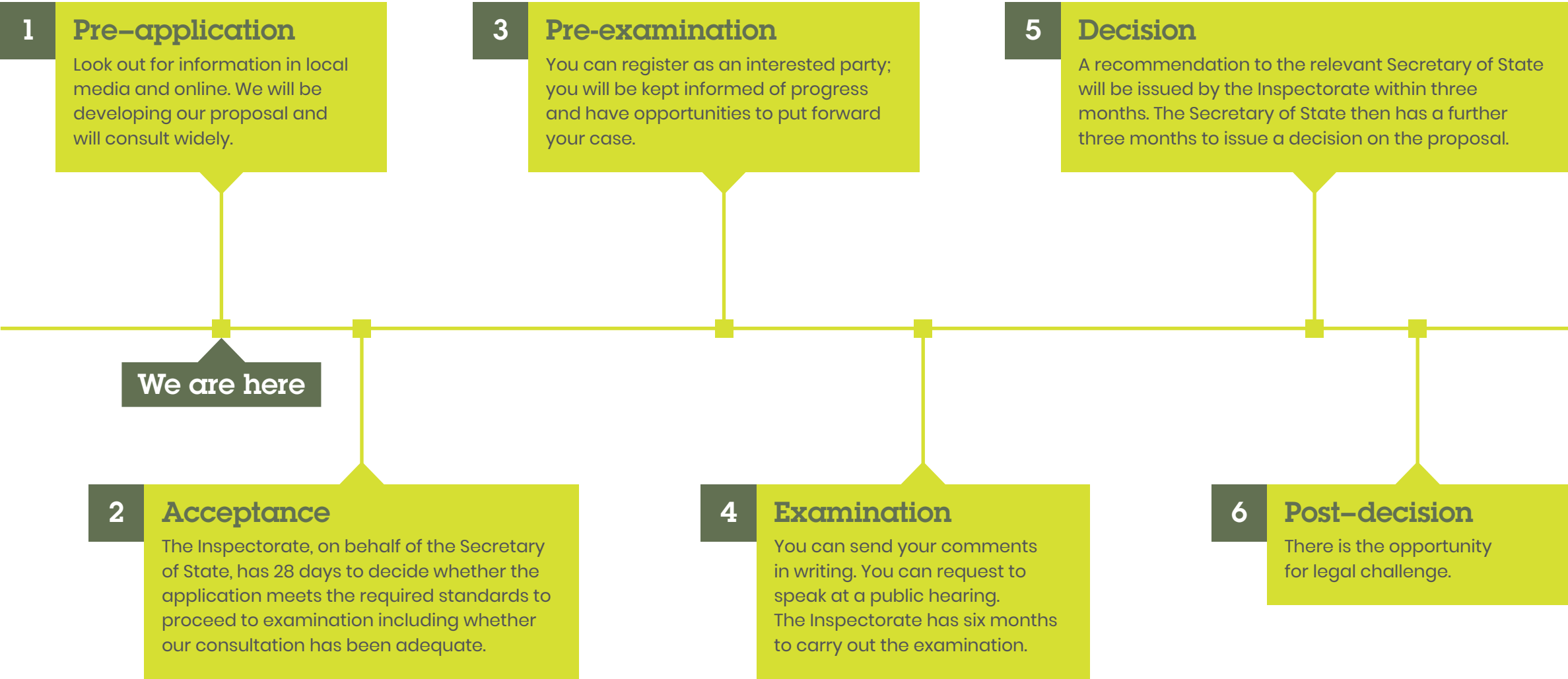
The Household Waste Recycling Centre

You may recall that we included information about a proposed Household Waste Recycling Centre (HWRC) in the last consultation. This will not form part of our DCO application, although we have included it in our environmental impact assessments. We have already submitted an application for planning permission for the HWRC to Kent County Council which will be determined separately to the DCO application.

You can find details of this application by going to Kent County Council's website: www.kentplanningapplications.co.uk and using the reference KCC/TM/0284/2019

The application is currently being determined by Kent County Council, with an expected decision on the application in July 2020.

The planning process



Environmental Impact Assessment

For the proposed Allington fourth line extension, we are required to carry out an Environmental Impact Assessment (EIA) of our proposals as part of the planning process.

The output from this process has informed the site design and content of the formal consultation process. We will submit an Environmental Statement (ES) which will report the findings of the EIA alongside the DCO application.

Since the last consultation, we have carried out formal EIA scoping with the Planning Inspectorate and, on the 24 December 2019, we received its formal Scoping Opinion confirming the scope of work that should be included in our EIA and reported in our ES. In addition to this we have also considered feedback we received and we have continued to engage with Kent County Council, Tonbridge and Malling Borough Council, Maidstone Borough Council and other regulatory bodies, such as Natural England and the Environment Agency, on our approach to the EIA. Feedback on these discussions has informed our EIA work to date.


We are now sharing the preliminary results of our assessments as part of this consultation. This booklet summarises our findings in areas such as air quality, transport and visual impacts that were raised during the last consultation. The results are presented in a document called the Preliminary Environmental Information Report (PEIR). Details of how to view the PEIR are included later in this booklet.

Following this statutory consultation, we will consider all feedback received and finalise our EIA. This will be submitted in support of our DCO application and will set out the outcomes of our assessments, as well as details of any proposed mitigation. During the formal consultation process, we will continue to engage with other regulatory bodies.


1. Scope
Consulting with statutory bodies on the type and method of assessments we need to carry out.




2. Conduct assessments
Including air quality, landscape and visual amenity, transport, noise, vibration, socioeconomics, cultural heritage, water, ecology and nature conservation, ground conditions, and any cumulative effects.




3. Consult
Publishing the preliminary results of our findings during the statutory consultation.



4. Consider
Considering all feedback received and finalising our Environmental Statement.



5. Submit
We must submit an Environmental Statement as part of our DCO application.



What are we proposing?

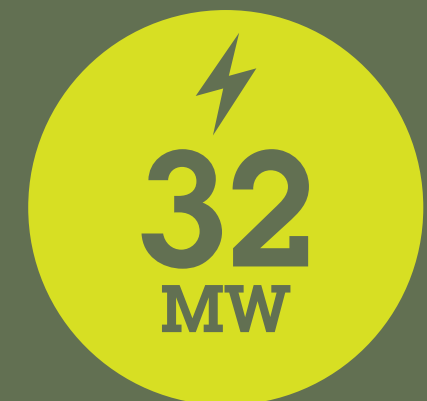
We are proposing to extend the existing EfW facility at the Allington IWMF with a fourth waste treatment line and associated infrastructure.

This will allow us to help meet waste management and energy needs at a local and national level by generating up to an additional 32MW of energy through the treatment of approximately 350,000 tonnes of residual waste each year.



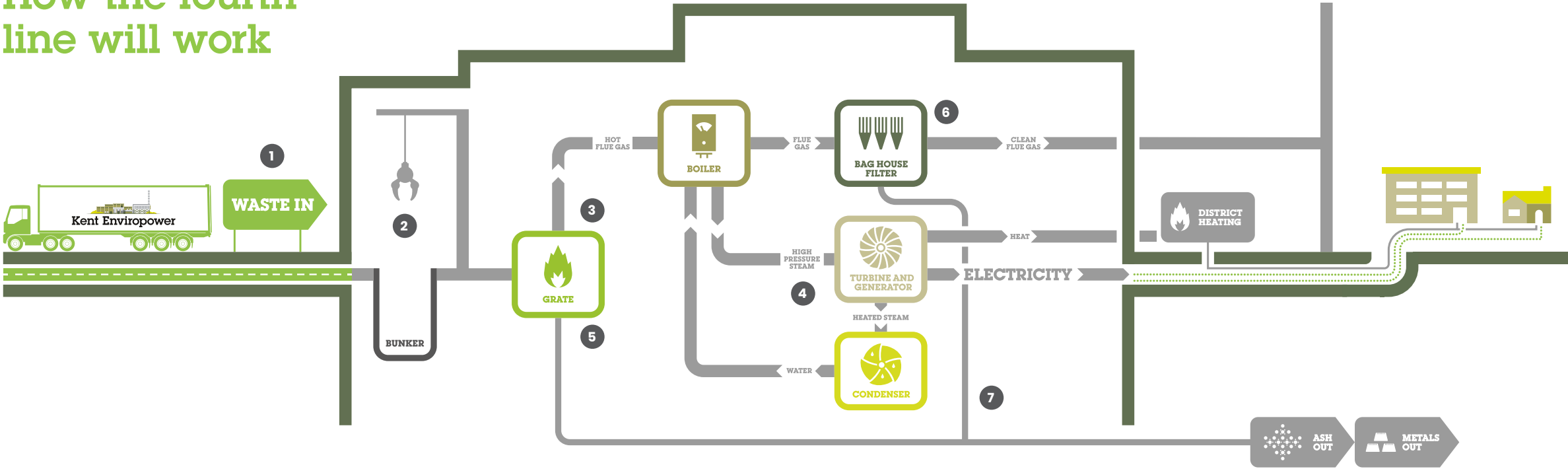
Indicative image showing the proposed extension alongside the existing IWMF from the north east

Since the last consultation, we have developed the design of the proposed extension in more detail. We can now show artists' impressions of how the proposed extension is likely to look. The images we are presenting are indicative at this stage – they are intended to give an impression of how the scheme will look. As we are seeking development consent for design parameters, this design will only be completely finalised once a DCO is granted.



of additional energy

How the fourth line will work



- 1: Residual Waste (waste that cannot be economically or practically re-used or recycled) is delivered to the fourth line extension. This will include capability to process bulky waste using a shredder.
- 2: From the waste bunker the waste is lifted and fed into a feed chute by overhead cranes.
- 3: Using proven Energy from Waste moving grate technology, the waste is combusted under controlled conditions at a high temperature to generate heat which is used to raise steam in a boiler.

- 4: The steam is then used to drive a steam turbine which generates electricity. At this point steam can be extracted to generate hot water to be exported to a district heating network or used for cooling in heat exchangers.
- 5: Bottom ash is produced from this process. This will be taken off-site for processing.
- 6: The gases produced by the combustion process are cleaned in the pollution control system using activated carbon and lime and are then filtered before being

released into the atmosphere via the single stack shared with the existing facility. The gases from both the proposed extension and the existing three lines are continually monitored as required by the Environment Agency under the Environmental Permit which will regulate the operation of the extension.

- 7: The residues filtered from the combustion gases are stored in dedicated silos. They are then transported in sealed tankers to a specialist treatment facility.

Responding to your feedback

In October and November 2019, we carried out an initial round of non-statutory consultation on our proposals. As part of the consultation, we wrote to more than 10,000 homes and businesses locally, held three public exhibitions and made information available online.

As part of the consultation we wrote to over

10,000

homes and businesses

We asked for views on our outline proposals for the scheme and our proposed approach to assessing its environmental impacts. We received 88 responses overall. Key issues raised included:

- Support for the principle of development (28% of responses).
- Concern about potential traffic impacts (24% of responses). These included impacts on Hermitage Lane, traffic leaving Quarry’s Wood and the risk of afternoon peaks in traffic.
- Lack of agreement with the principle of development (18% of responses).
- Support for the reduction of waste to landfill (10% of responses).
- Concern about potential air quality impacts (10% of responses), particularly the potential for dioxins or particulate matter to be released into the atmosphere and cumulative impacts with traffic on the M20.

The issues raised during the non-statutory consultation have informed the content we are presenting as part of this consultation and are addressed in this booklet.



Photo from previous round of consultation

Air Quality

Gases are produced as by-products of the EfW process. Managing them safely is a key part of the design of the proposed extension.

As with the existing Allington facility, these gases will be treated within the facility to remove contaminants, before being released safely into the atmosphere through the stack.

The proposed extension will share a stack with the existing facility. It will use a continuous, automatic monitoring system, which operates 24 hours a day, all year round. The monitoring results are automatically recorded by the site and reported to the Environment Agency.

Assessments

We have modelled the impacts of the extension on air quality. As part of our environmental impact assessment, we have considered the impacts of the following during construction/decommissioning and operations:

- › Generation of dust from construction/decommissioning activities on site.
- › Generation of odour from construction/decommissioning activities on site.

- › Generation of exhaust pollutants from construction/decommissioning phase traffic.
- › Operational phase process emissions.
- › Generation of pollutants from operational phase traffic.
- › Operational phase dust and odour emissions.
- › Effects from the proposed HWRC.
- › Cumulative effects.

The assessment considers potential impacts on both human health and ecology. They also take into account Air Quality Management Areas.

Mitigation

Our assessments have informed the design of the proposed extension, as well as the way we will build and operate the extension. As set out in the ‘How it will work’ section on page 10, we will treat gases produced by the energy from waste process within the facility. We need to ensure that the stack which we use to release what is left after treatment is high enough to meet strict environmental limits.



The proposed height of 90 metres for the new, combined, stack for the existing IWMF and the proposed extension takes into account the results of our assessments. As this is 10 metres taller than the existing stack, it will also reduce emissions from the three processing lines currently operating at the site by increasing the buoyancy of the exhaust gases.

We have also considered potential impacts on air quality during construction. We will use best practice measures to reduce impacts from construction such as dust. These will be set out in the Construction Environmental Management Plan (CEMP) that will be submitted in support of our DCO application. The CEMP is available to view as part of the PEIR.

Conclusions

Our assessments show that whilst there would be some increases in emissions as a result of the proposed extension, the overall impact on air quality would be negligible for all of the scenarios we have assessed. This includes the cumulative effects of other planned development in the local area and the proposed HWRC.

Ecology

As part of our EIA, we have assessed the potential impact of the scheme on habitats and species.

Assessments

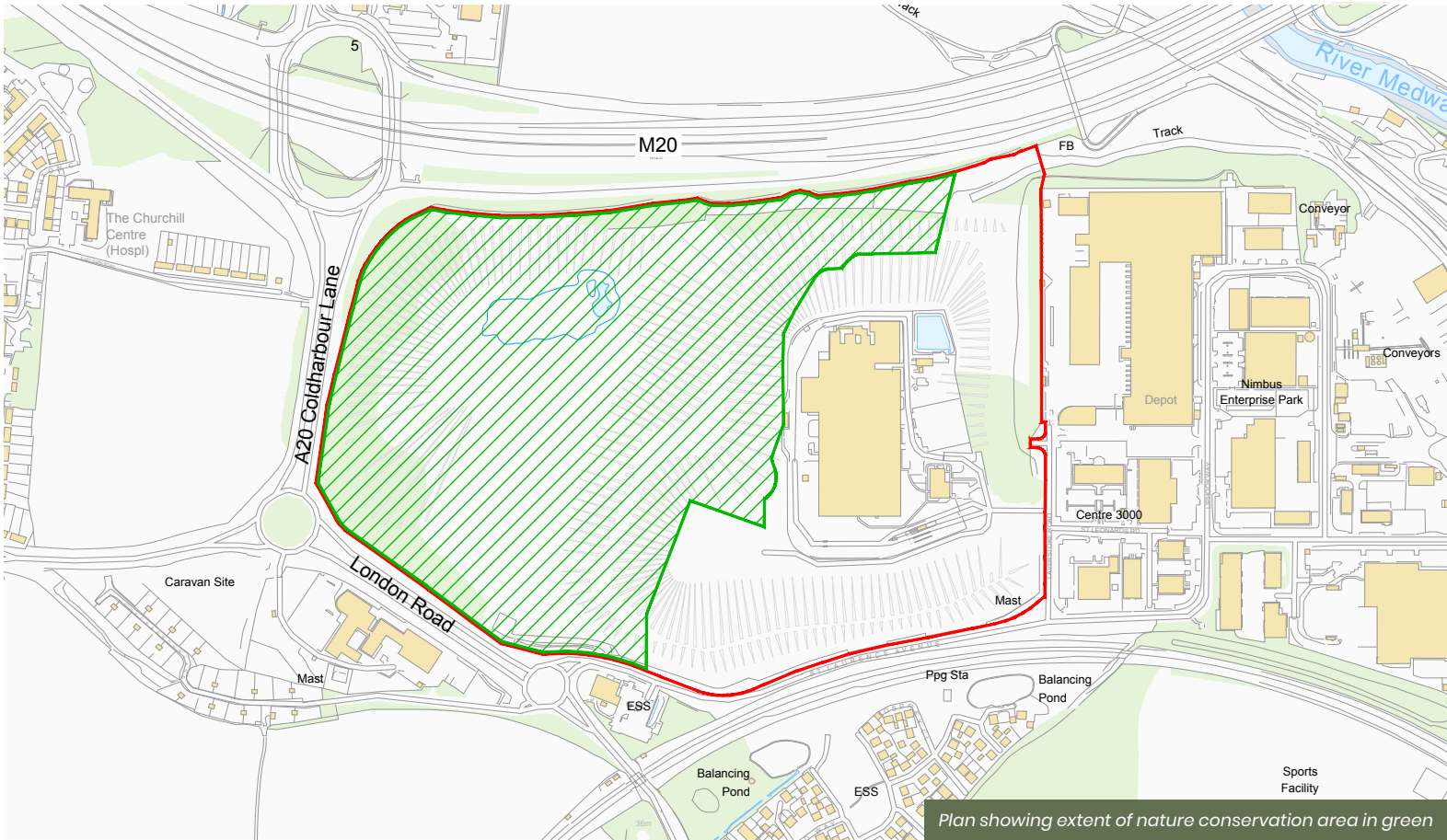
Our assessment has been informed by a series of habitat assessments and ecological surveys which have been carried out on the site and on other ecological sites in the surrounding area. This process has helped us understand the potential impact of development and any mitigation that might be needed. Our assessments have enabled us to produce a scoring matrix, based on requirements from Natural England, which calculates the ecological value of the site at present.

In addition, the assessment has also considered the impact of emissions from the shared stack and traffic movements on ecological sites within the area surrounding the site.

A key factor for us to consider is that the proposed extension will use land on the western half of the site. Most of this land has been set aside as a nature conservation area, although it does not have any formal designation as such.

Site Boundary

Nature Conservation Area



Ecology

Mitigation

We are proposing a comprehensive landscape and ecological enhancement scheme in connection with the proposed extension. This will improve on the part of the site that was originally included within the nature conservation area that will remain once the proposed extension is built. It will also allow public access to this part of the site for the first time.

Whilst the remaining enhanced area will be smaller than the current nature conservation area, our assessments show that this loss in terms of space would not be significant in assessment terms and would not require us to take any further action. However, we recognise the importance of the nature conservation area both locally and in the site's history. As such, we are pursuing proposals for compensatory ecological enhancement measures at another site owned by FCC at Stangate, near Borough Green. These measures will include improvements to the restoration of the site through increased biodiversity and landscaping.

The aim is for FCC to submit separate applications to Kent County Council to secure the improvements at the Stangate site and deliver them in accordance with a new legal agreement with the Council.

The proposed ecological and enhancement scheme for Stangate requires planning permission because it includes minor elements of engineering to alleviate historical differential settlement. If Kent County Council was minded to refuse planning permission for whatever reason, FCC is committing to implement an alternative improvement scheme that does not require planning permission but would still bring forward biodiversity improvements at the site.

The measures proposed at Stangate will more than compensate for the loss of the nature conservation area in ecological terms. Consultation on the scheme has been undertaken so the principles of the improvements at Stangate can be prepared for inclusion in an application to be submitted by October 2020 to Kent County Council.

Other mitigation measures are also proposed for the construction phase of the project; these include measures to protect orchids on the site and to avoid bird breeding season and will be set out in the CEMP.

Conclusions

The proposals will have no significant adverse effects on ecology following mitigation and would achieve biodiversity net gain of 10% of baseline values.

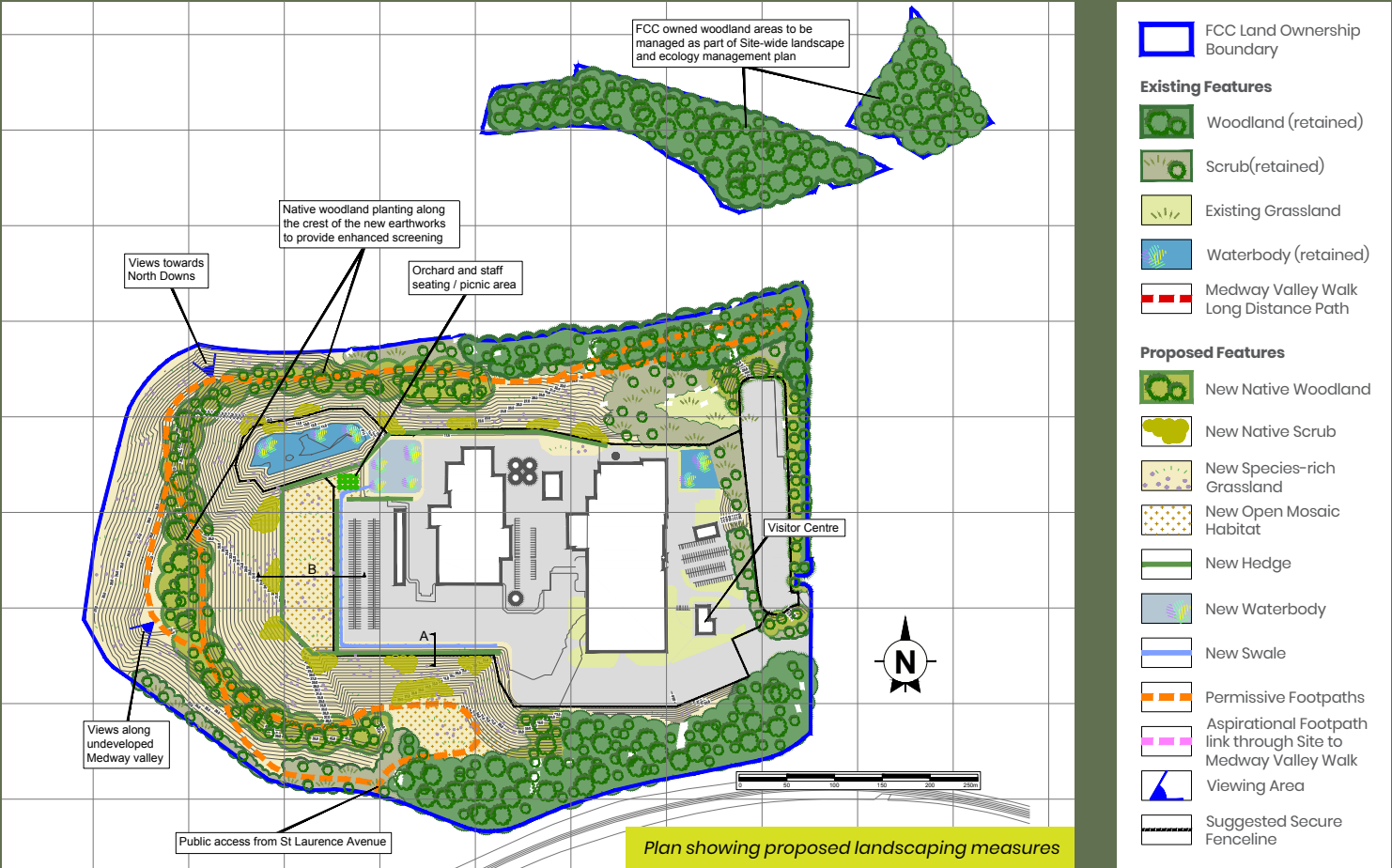
Landscape and visual impact

We have assessed the potential impacts of the proposed extension on the surrounding local landscape, views into the site and visual amenity. This process has involved looking at the impact of our design proposals from a number of different viewpoints.

The existing IWMF and the proposed extension are located within the base of a former quarry and will be surrounded by the carefully designed and relocated perimeter screen bund and associated planting works. This means that the majority of the existing IWMF and the proposed extension will not be visible from beyond the site boundary. As with the current facility, the most visible part of the proposed extension from most locations outside the site will be the stack.

Following feedback from the informal consultation, FCC has worked on achieving a single, combined stack for the proposed extension. This means that the visual impact of the proposed extension will be similar to the existing IWMF, although at 90 metres above ground level the new stack will be 10 metres taller than the existing stack. In practice, both stacks are set approximately 10 metres below surrounding ground level so the height of the new shared stack viewed externally would be 80 metres.

The main new impact on views will therefore be during construction. There will be a period of around 22 months while we are building the combined stack when we will need to continue using the existing stack. This will be dismantled as soon as possible once the new stack is operational.



Noise

We have assessed potential noise impacts as part of our EIA. We have agreed the methodology we would use for the assessment with PINS and local authority environmental health teams (EHO).

Assessments

This has involved comparing the noise which may be generated by the construction/decommissioning and operation of the proposed extension to baseline noise information.

To develop our baseline for noise information, we took readings of noise levels at five locations which taken together represent the typical background noise environment – these are known as ‘noise sensitive receptor areas’. We also carried out additional noise measurements at other, more distant, receptors. This was carried out in agreement with the EHOs over a weekend period to establish the lowest likely representative background levels.



Noise

Mitigation

We will put in place measures to manage potential noise during the construction of the proposed extension. During this phase of the development, we will consider carefully the hours we work on site as well as the routes construction vehicles use. We will also seek to be considerate in the equipment we use on site and how we use it to minimise noise.

For the operational phase we are proposing a series of noise limits at the nearest residential properties to the site. The noise limits would be set at a level that is close to the existing baseline noise levels that are currently experienced at those properties.

FCC would then need to design the proposed extension to ensure that it meets those levels. We have modelled this based upon likely design and are confident that we can comply with these limits. Compliance with the operational noise limits would be secured through a requirement (condition) in the DCO.

We took readings of noise levels at

5 Locations

which taken together represent the typical background noise environment

Conclusions

Our assessments show that, with the implementation of mitigation and the imposition of the noise limits, there would be no significant impact during construction/ decommissioning or operation of the proposed extension.

Transport and access

The proposed extension will be accessed using the existing access to the Allington IWMF from Laverstoke Road. This will be served by a new gatehouse and weighbridge arrangement serving the whole site.

We have assessed potential transport impacts thoroughly and we have prepared a comprehensive Transport Assessment in support of the PEIR.

Assessments

Based on the scope of assessments agreed with the local highway authority, Kent County Council, and Highways England, we have assessed potential transport impacts as part of our EIA. The site benefits from good access to junction 5 of the M20 and movements associated with EfWs tend to be outside of peak travel hours.

To support our assessments, we gathered information on the operation of the existing highway network. This has included traffic counts, accident data, sustainable transport measures and information on any highways improvement works, such as those proposed for the Coldharbour Roundabout. We combine this baseline information with estimated traffic from the proposed extension during construction and operations. The assessment has also taken into account other planned developments in the local area including the proposed HWRC development.

Our assessment of traffic during peak times during construction and on a typical weekday is shown in the tables on this page. The full results of our traffic assessments to date are included in the PEIR.

Mitigation

The new gatehouse and weighbridge will be key to managing traffic arriving at and leaving the site. The weighbridge infrastructure will be moved further into the site with additional queuing capacity for HGVs both before and after the weighbridges to prevent traffic impacts on the local road network.

Additionally, we will put in place plans to manage traffic appropriately at each stage of development. During construction, we will put in place a Construction Traffic Management Plan and Abnormal Load Plan to manage vehicles going to and from site. We will also adopt a Travel Plan to encourage sustainable staff travel for the extended facility once operational.

Transport – Traffic Generation

Operational Phase Traffic Generation (Weekday)

	Arrivals	Departures	Total
HGV	94	94	188
Staff/Light Goods	20	20	40

Construction Phase Traffic Generation (Peak Daily)

	Arrivals	Departures	Total
HGV	94	94	188
Construction Worker	266	266	532

Conclusions

Our assessments show that, given review of anticipated future operational highway conditions and with reference to appropriate guidance, the proposed extension would not give rise to any significant transport-related environmental effects during either the construction/ decommissioning or operational phases.

Construction

Should we receive development consent, we expect construction to take place over a period of 44 months. This includes the work required to make the new extension operational once it is built. Key dates for the construction phase include:

June 2022 – Commencement on site.

June 2022 – Start of earthworks.

April 2023 – Completion of earthworks.

April 2023 – Fourth Line build start.

February 2025 – Fourth line build completion (Construction completion certificate previous to commissioning).

June 2026 – Full operational commencement – There will be a 22 month period where we transfer the existing three processing lines to the new combined stack when two stacks will be visible.

We recognise the potential impact of construction on our neighbours and will put in place a plan designed to ensure potential impacts are managed and properly communicated. Continuing to work with the Community Liaison Committee established at the facility will be an important part of this process.

The plan will include a draft Construction Environmental Management Plan (CEMP) with our DCO application. This will set out the principles, controls and measures we will use to manage potential environmental impacts during construction.

Prior to the main construction works an initial site compound will be established to manage construction activities for the earthworks on site. Following this a more established construction compound will be constructed for the duration of the main extension construction activities. Following completion of construction activities, some of this area would be converted to form a compound that would be used during planned maintenance activities. The remainder would form part of the landscape area.



Indicative image including construction laydown area

Community

The existing Allington IWMF is an established part of the local community. The site donates annually from a designated £1,000 charity fund to the Community Liaison Committee (CLC) which is distributed to local charities in the surrounding area.

The CLC was established in the 2000s and includes residents, elected representatives and representatives from regulatory bodies. The CLC group is invited every quarter to a meeting at Allington IWMF. The management team from the site join the group and provide answers to any questions and issues raised by the CLC, as well as providing an update on site performance and maintenance. This is an important relationship with the local community, and FCC is committed to maintaining and working alongside the committee.

This will include working proactively with the committee during the planning and construction process. This will be a key part of ensuring that our proposals and any construction work is communicated locally.

Allington IWMF currently employs around 100 people, many of whom live in the local area. We estimate that the extension will create a further 30 jobs.



Photograph from community site tour

Consultation

It is important to FCC that we engage, listen and take on board your views on our proposals and invite you to respond to this formal stage of the DCO consultation process.

We are consulting at a time when it is not possible to meet in person, due to the COVID-19 pandemic. We are putting in place a detailed package of measures to ensure we can continue with the consultation.

We remain very aware of how important it is to make sure that anyone in the community who wants to find out more or share their views on the proposals, is able to do so. We're providing a range of ways to do this.

Find out more

1. Viewing a virtual exhibition and consultation documents on our website:
<https://kentenviropower.fccenvironment.co.uk>
2. Viewing a series of available webinars we will give about the proposals online. This will offer the opportunity to ask questions about the proposals. You can register your interest for the webinar on our website or using the contact details on the following page. Recordings of the webinars will also be made available on our website.
3. Booking an appointment to talk to us individually about the proposals by Freephone using the contact details on the following page. This will offer the opportunity to speak with members of our technical team if you have questions about specific aspects of our proposals or would like us to talk you through the development proposals.
4. Contacting us directly using the contact details on the following page.

Viewing documents

All consultation documents, including the PEIR and the SoCC, are available to view on our website:

<https://kentenviropower.fccenvironment.co.uk>.

If you are unable to view documents online, please contact us using the details below and we will make arrangements to ensure you are able to access the information you require.

We are also required as part of the planning process for NSIPs to place a physical copy of consultation documents on deposit. A physical copy of the consultation documents will therefore be kept on deposit at the existing Allington IWMF. To allow us to ensure compliance with social distancing rules, these can be viewed by appointment using the contact details in this booklet.

Any consultee should follow the Government's latest advice on social distancing when accessing consultation information: **www.gov.uk/coronavirus**

Consultation

Responding to the consultation

The consultation will take place between 20 July and 14 September 2020. There are a few ways to respond:

- › Complete a questionnaire online at our website:
<https://kentenviropower.fccenvironment.co.uk/>
- › Complete a questionnaire and return it to
FREEPOST Allington IWMF consultation,
c/o Newgate Communications, Elizabeth House,
Greywell Road, Up Nately, RG27 9PR
- › Complete a questionnaire and send by
email to **allington@fccenvironment.co.uk**
- › Write to us directly using the email address
or Freepost address set out above

We will consider all responses received by the closing date of the consultation, 14 September 2020.

Contact us

For further information, please contact us:

- › Phone: 0800 130 3353
- › Email: **allington@fccenvironment.co.uk**
- › Post: FREEPOST Allington IWMF consultation,
c/o Newgate Communications, Elizabeth House,
Greywell Road, Up Nately, RG27 9PR

You can also view our website:

<https://kentenviropower.fccenvironment.co.uk/>



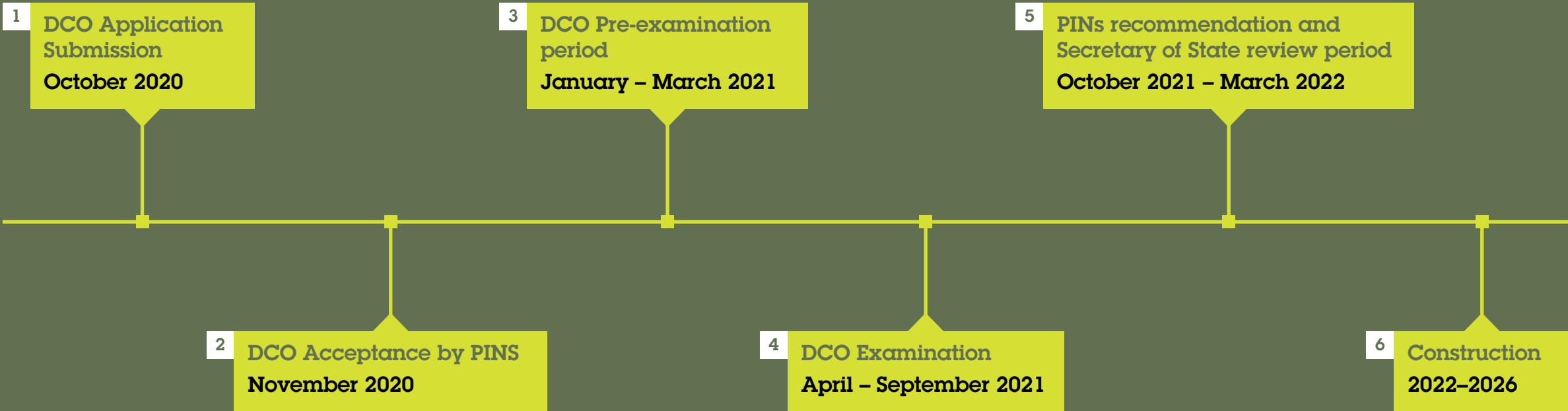
Next Steps

Thank you for your interest in our proposal to extend the Allington IWMF.

Following this statutory consultation, we will consider all the views we receive and finalise our DCO application. This will include a Consultation Report setting out how we have considered responses to the consultation.

We expect to submit our DCO application in autumn 2020.

If our application is accepted by PINs on behalf of the Secretary of State for Business, Energy and Industrial Strategy, there will be a further opportunity for you to make representations as part of the process for determining the application.





Ground Floor West, 900 Pavilion Drive
Northampton Business Park
Northampton NN4 7RG
fccenvironment.co.uk