

Pure Green Ltd

*Cheney Manor Biomass Plant,
Swindon – Non Technical Summary*

April 2013

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Authorisation Sheet

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Project: *Cheney Manor Biomass Plant – Non
Technical Summary*

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Swindon Borough Council

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1. Introduction

- 1.1.1 This is a Non-Technical Summary of the Environmental Assessment report submitted in support of the planning application for the Cheney Manor Biomass Plant to be built on the Cheney Manor Industrial Estate in Swindon. The application has been submitted to Swindon Borough Council by Pure Green Ltd.
- 1.1.2 The main purpose of the Cheney Manor Biomass Plant is the manufacture of animal bedding and wood pellets from virgin timber feedstocks. Particular applications include coal-fired power stations, as well as industrial, commercial and domestic heating systems.
- 1.1.3 Associated with the wood pellet manufacturing process is a biomass combined heat and power (CHP) plant that will provide all of the heat and power required to operate the facility. The biomass CHP plant have a combined generating capacity of about 31 MW_e, and surplus renewable electricity, sufficient to power about two thirds of the homes in Swindon, will be exported to the local distribution network.
- 1.1.4 The biomass CHP plant will burn recycled wood, and the resulting savings in emissions of carbon dioxide for the Cheney Manor Biomass Plant as a whole is estimated to be of the order of about 14,500 tpa, based upon the displacement of about 35,200 MWhr of electricity currently generated by the burning of fossil fuels.
- 1.1.5 The Non-Technical Summary presents an analysis of the implications of the proposal in non-technical language. It has been produced in accordance The Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 2011.
- 1.1.6 The Non-Technical Summary and the environmental assessment report have been produced following the screening opinion received during the consultation period from Swindon BC, which confirmed that the Cheney Manor Biomass Plant was not an EIA development. Accordingly, an environmental assessment was undertaken that was proportionate to the significance of the various environmental aspects associated with the proposed development.
- 1.1.7 Both this Non-Technical Summary and the full planning application documents are available from a number of sources:
- i. At the offices of Swindon Borough Council, where they may be examined by members of the public during usual opening times.
 - ii. By writing to:

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- 1.1.8 Unless otherwise stated, copyright to all diagrams, illustrations and photographs belong solely to Pure Green Ltd and must not be reproduced without written permission.

- 1.1.9 Some of the figures in the environmental assessment report are based upon Ordnance Survey maps which have been reproduced with the permission of the Controller of Her Majesty's Stationery Office.

2. Background to the Project and Need for the Development

2.1 Introduction

- 2.1.1 The Cheney Manor Biomass Plant involves the manufacture of ~50,000 tpa of animal bedding and pellets that will obviate the need to import this material from continental suppliers. The facility will also incorporate a biomass CHP plant that will burn locally-sourced recycled wood, generating ~4.4MW_e of renewable electricity and ~13MW_{th} of thermal energy for use within the process, with the surplus heat and power available for export to off-site third party users.
- 2.1.2 The most obvious alternative to the proposed Development is the continuation of the current procedure of importing the animal bedding and feed materials from European manufacturers on the continental mainland. This option would maintain the *status quo* and may be considered as the “do-nothing” option. However, this does not represent a sustainable situation due to issues associated with bulk transportation of materials over distances involving several hundreds of miles in round trips from continental Europe. Furthermore, it does not address key policy areas that require reductions in greenhouse gas emissions from fossil fuel burning (vehicular emissions from HGVs), and does not address the issue of renewable energy recovery from recycled wood that is currently consigned for disposal to landfill..
- 2.1.3 The Cheney Manor Biomass Plant has a significant requirement for process heat (approximately 8MW_{th}) to dry the incoming virgin timber to the level required for the manufacturing processes. This heat will be provided by a biomass CHP plant that will process recycled wood. Currently, the majority of the ~50,000 tpa of recycled wood that will be used as fuel by the biomass CHP plant is not of sufficiently high quality for use in board manufacture, and similar processes, and is consigned for disposal to landfill. This results in emissions of potent greenhouse gases such as methane due to the anaerobic decomposition processes that occur within landfills. The utilisation of recycled wood as a fuel for the biomass CHP plant, offers a significant environmental improvement in the way in which this material is currently managed.

Existing Nearby Operations

- 2.1.4 Justification for the need for a particular project is important, particularly if there are other similar or complementary activities already undertaken within the locality.
- 2.1.5 The main purpose of the Cheney Manor Biomass Plant is the production of animal bedding for sale into local markets in the south of England. This is an expanding market and there are very few similar manufacturing facilities currently operating in the south of England, with markets supplied predominantly by manufacturers from continental Europe.

- 2.1.6 A new generation of smaller-scale energy recovery facilities based upon waste biomass is emerging around the UK, and these facilities will be located strategically to service local markets in accordance with the Proximity Principle. In order to minimise the “carbon footprint” associated with the treatment of these biomass fuels, operators aim to source their fuel feedstocks from as close as is feasible within the area.
- 2.1.7 The Cheney Manor Biomass Plant incorporates a biomass CHP facility that will burn recycled wood sourced locally. It should be noted that the operation of the bedding manufacturing plant is reliant upon the heat and power supplied by the biomass CHP plant, and so it forms an integral part of the overall development.
- 2.1.8 Pure Green Ltd and its technical advisors have identified fuel supplies for the recycled wood that will be required for the biomass CHP plant, and there is no conflict with the wood fuel supply requirements for other biomass combustion developments nearby.

3. Summary of the Cheney Manor Biomass Plant

3.1 Project Summary

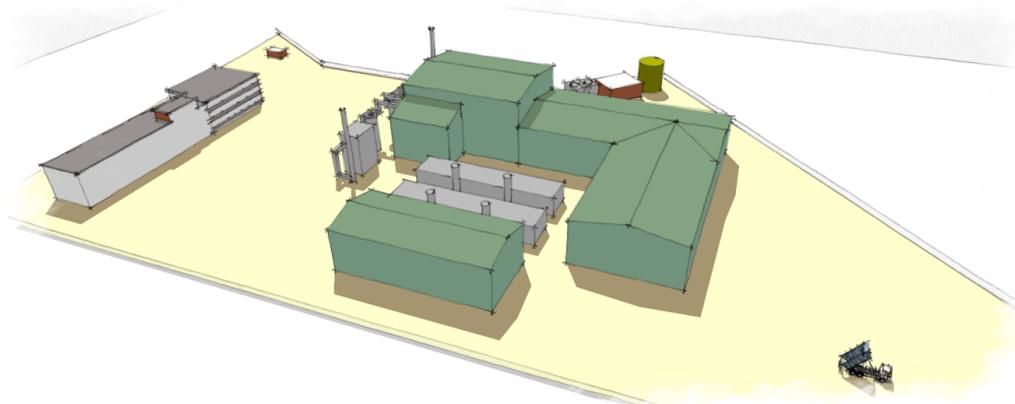
Proposed Activities

3.1.1 Pure Green Ltd proposes to build a Biomass Plant on the Cheney Manor Industrial Estate to the south-west of Swindon town centre. The Cheney Manor Biomass Plant incorporates two main process activities:

- i. 50,000 tpa animal bedding and wood pelleting manufacturing process incorporating debarking, shaving, drying, baling and pelleting facilities; and,
- ii. As part of Phase 1 of the development, a temporary 8MW_{th} input biomass boiler to provide process heat for the biomass drying process; and,
- iii. As part of Phase 2 of the development, a net calorific value input of 20 MW_{th} biomass CHP plant to provide process heat for the biomass drying process and to generate ~4.4 MW_e of renewable electricity, of which 3MW_e will be available for export to the local distribution network.

3.1.2 The Cheney Manor Biomass Plant will be installed in new purpose-designed buildings that will be erected on the site. Some of the existing buildings will be demolished as part of the redevelopment of the site to accommodate various components of the overall development. The proposed layout is shown in the three dimensional layout drawing below.

Figure 3-1 3D Layout Plan for the Proposed Cheney Manor Biomass Plant



3.1.3 The Cheney Manor Biomass Plant will manufacture ~50,000 tpa of animal bedding material and wood pellets from de-barked forest round wood and sawmill co-products. This material will be sourced predominantly from within an approximate 50 mile radius of the development site. The products from the manufacturing process are currently supplied by the developer from its manufacturing facilities in Belgium, so the development in Swindon will provide a sustainable supply of animal bedding material from local biomass sources.

3.1.4 As referred to earlier, the animal bedding manufacturing process will be serviced by a biomass CHP plant, with a temporary biomass boiler as part of the Phase 1 development of the site. The biomass CHP plant will process a mixture of recycled wood, composted wood and forest wood materials arising from the debarking of the animal bedding feedstocks. Based on 8,000 operational hours per year, the annual consumption of wood fuels by the biomass CHP plant is estimated to be about 50,000 tpa.

- 3.1.5 The biomass CHP plant will provide ~8MW_{th} of process heat to the biomass drying plant, with the potential to supply ~5MW_{th} of hot water to adjoining commercial or industrial premises wherever practicable. The biomass CHP plant will also generate about 4.4MW_e of renewable electricity, with a net output of ~3MW_e for distribution to the local distribution network. The electricity generated by the biomass CHP plant will be exported to the local distribution network via an underground connector.
- 3.1.6 The new buildings and associated land that will incorporate the manufacturing facility will occupy an area of ~2.0Ha. All major items of equipment will be housed internally to minimise the potential for fugitive noise and dust emissions from the various processes. The exception to this will be the cooling towers associated with the boiler of the biomass CHP plant, which will be located externally.
- 3.1.7 There will also be a requirement for a chimney to discharge emissions to atmosphere generated by the combustion of the biomass fuels within the Phase 1 temporary biomass boiler and the Phase 2 biomass CHP plant. The chimneys will be situated adjacent to the respective buildings and will be 30 metres tall in the case of the biomass CHP plant, and 24 metres tall for the temporary biomass boiler.
- 3.1.8 The construction phase of the development will be staged according to the delivery times on lead items for the biomass combustion plant. It is anticipated that, subject to a successful planning application, the animal bedding plant could be operational in late 2013 or early 2014 during Phase 1 when a temporary biomass boiler will be installed to supply the heat requirements of the process. The biomass CHP plant will probably be commissioned in 2015 during Phase 2 of the development.
- 3.1.9 An Environmental Permit will be required from the Environment Agency in order to operate the biomass CHP plant, and an application is being prepared concurrently with the planning application.

4. Location for the Cheney Manor Biomass Plant

4.1.1 The proposed animal bedding manufacturing facility is to be located on an existing site within the Cheney Manor Industrial Estate to the west of Swindon town centre. The existing warehouse building on the site will be demolished to make way for the new buildings that house the manufacturing process equipment, and the biomass CHP plant that will generate 4.4MW_e of renewable electricity and supply thermal energy to the animal bedding manufacturing facility to dry the incoming feedstocks.

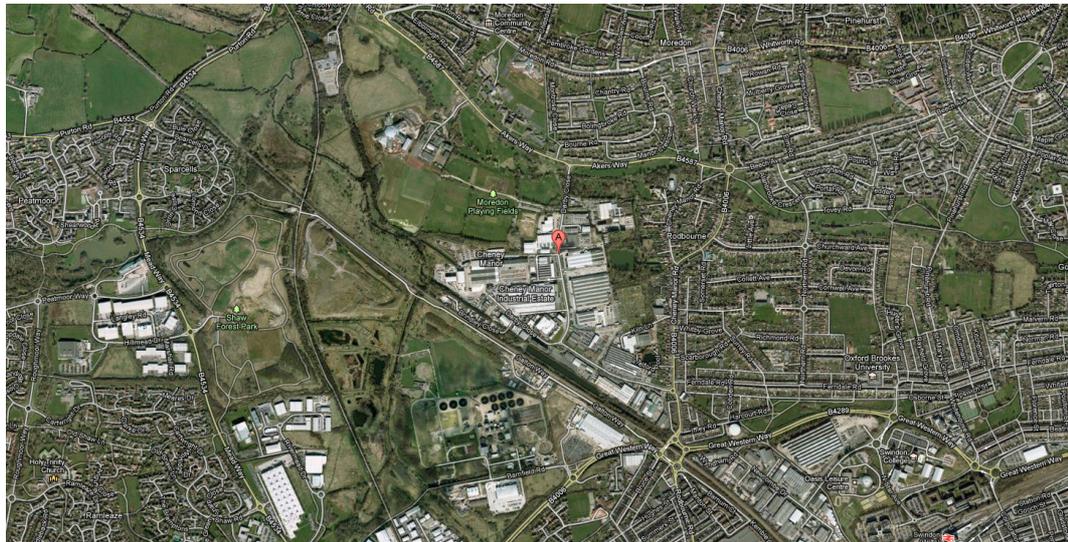
4.1.2 The development site is currently occupied and used as a warehouse and distribution centre for imported furniture. The animal bedding manufacturing facility will occupy a total area of ~2.0Ha within the overall site, which occupies about 3.6Ha in total. The remainder of the site will be laid to hardstanding, the majority of which is already in place.

4.1.3 The following provides a brief description of the environmental setting of the proposed Development.

4.2 Location and Surrounding Land Use

4.2.1 It is intended that the animal bedding manufacturing facility will be located at national grid reference 413230,186150. The existing main warehouse building will be demolished to make way for purpose-designed buildings to house the process equipment and the biomass combustion plant. The local setting is shown in the aerial photograph below.

Figure 4-1 Aerial Photograph Showing the Proposed Location of the Cheney Manor Biomass Plant and Nearby Land Use



4.2.2 The approximate location of the Cheney Manor Biomass Plant development site is indicated by the marker. Immediate neighbours include the following:

- iii. To the north
 - a. Industrial units; and
 - b. Residential properties farther afield.
- iv. To the west
 - a. Industrial units, including SCS;

- b. Scrubland; and,
- c. Residential properties farther afield.
- v. To the east
 - a. Industrial units;
 - b. Residential properties farther afield;
 - c. Swindon town centre.
- vi. To the south
 - a. Industrial units;
 - b. Main railway line;
 - c. Sewage treatment works; and,
 - d. Residential properties farther afield.

4.2.3 The nearest residential properties are approximately 500 metres to the south-east of the Biomass Plant development site.

4.2.4 The condition of the site at present is shown in the following aerial photograph.

Figure 4-2 Aerial Photograph Showing the Location of the Development Site and Nearby Land Use



4.2.5 The Cheney Manor Biomass Plant is to be located within the confines of land enclosed by the red line as indicated above. The office block to the east of the site is currently unused and will be retained by Pure Green Ltd as part of the redevelopment of the site. However, the main building will be demolished to make space available for the biomass CHP plant and other buildings associated with the animal bedding manufacturing processes.

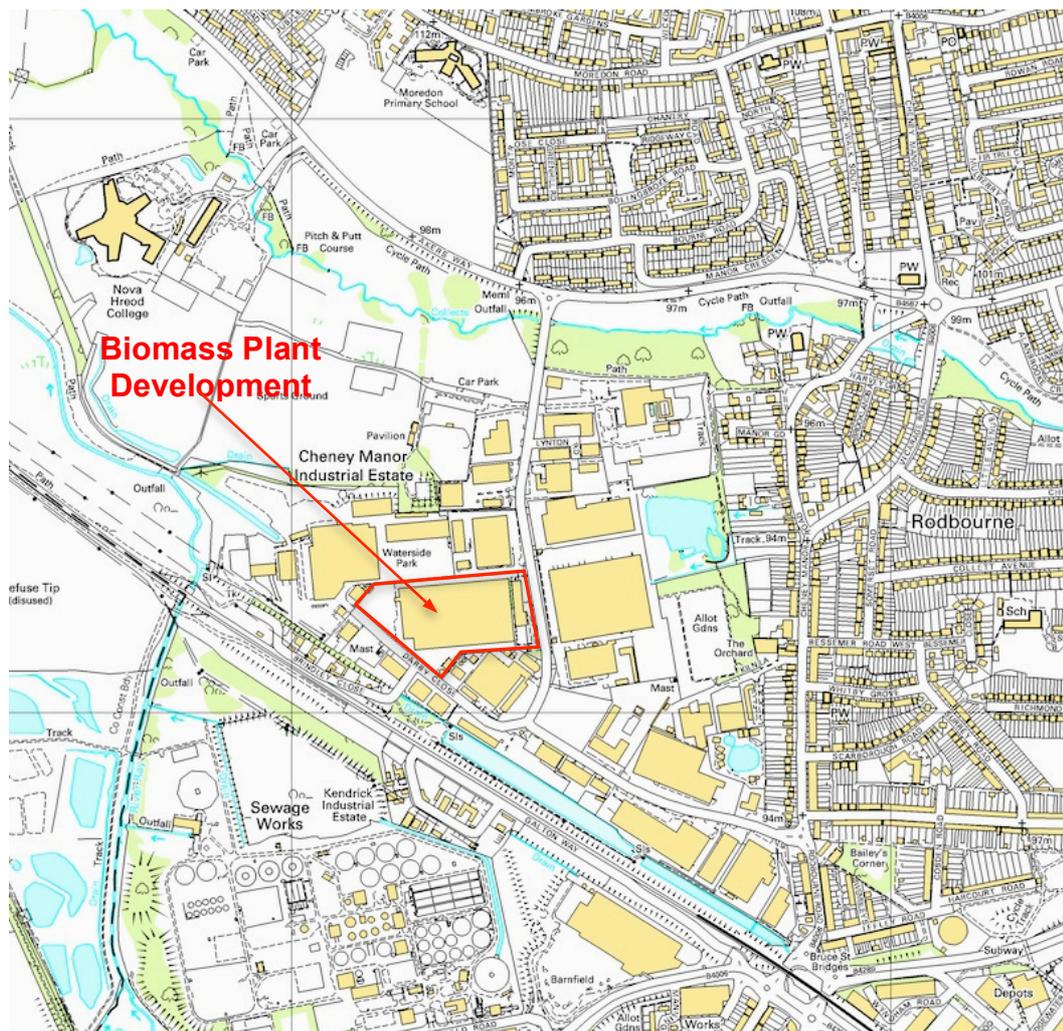
4.3 Site History

4.3.1 Cheney Manor Industrial Estate was originally developed after Swindon was named an expansion town during the 1952 Town Development Act. A variety of firms were attracted to the new industrial estate including Plessey, The Metal Box Company, Square D and several smaller companies, and by 1965 the industrial estate also contained factories for clothing manufacture, small engineering and proto-type casting firms, a GPO engineering depot and numerous distribution stores and warehouses. The Cheney Manor Biomass Plant development site was previously occupied by Square D, a company that manufactured industrial control products and systems.

4.4 Environmental Quality

4.4.1 The development site is to be located on the Cheney Manor Industrial Estate, approximately 2.5km to the west of Swindon town centre. The location of the development site is shown in Figure 1-2. The animal bedding manufacturing facility will occupy an area of approximately 2.0Ha, covering approximately 55% of the site as a whole. The development site boundary is shown below (**Figure 4-3**).

Figure 4-3 Location of the Biomass Plant – Relative to Nearby Residential Properties



4.4.2 The land surrounding the site is predominantly industrial/commercial in character, and historical mapping shows that prior to the 1950s, the area was undeveloped and was used for agricultural purposes or was undeveloped natural habitat. There is one ecologically sensitive site within 2km of the development site, the Seven Fields LNR, which is designated for conservation as it comprises a copse dating back to 1796, and an area of unimproved meadows that contains over 200 species of recorded flowers and grasses including yellow rattle, vetches and orchids.

- 4.4.3 There are also several County Wildlife Sites in the vicinity of the development site. Information provided by the Wiltshire and Swindon Biological Records Centre (WSBRC) identified seven designated areas that were included in the atmospheric dispersion model as specific receptors.
- 4.4.4 Within 10km of the development site there are fifteen SSSIs, although several are designated for their geological significance, and are unlikely to be affected by emissions from the Cheney Manor Biomass Plant and require no further assessment.

5. Key Environmental Issues

5.1 Introduction

5.1.1 This section of the Non Technical Summary considers the key environmental issues associated with the operation of the Cheney Manor Biomass Plant.

5.1.2 The matters considered therefore are:

- Air Quality
- Flood Risk
- Noise
- Transportation
- Ground contamination
- Ecology
- Landscape and Visual Impact
- Water quality and supply
- Archaeology and heritage
- Socio-economic impacts
- The Supply of Fuel
- Energy Efficiency

5.2 Air Quality Impacts

5.2.1 A detailed air quality assessment was undertaken as part of the environmental assessment undertaken to support the planning application. The assessment was based upon the use of a computer model that is used by Local Authorities and the Environment Agency for regulatory assessment. Emissions were based upon a series of worst case assumptions using the maximum emission limit values that will be applied to the operation of the biomass CHP plant associated with the Cheney Manor Biomass Plant by the licence that will be required prior to operation.

5.2.2 The conclusions from the air quality assessment were that emissions from the various processes associated with the Cheney Manor Biomass Plant were unlikely to cause an exceedence of an air quality standard, and in most cases were likely to have an insignificant impact on local air quality.

5.2.3 Issues associated with dust and odour generation were assessed and dismissed as insignificant due to controls that will be put in place during the construction and operation of the Cheney Manor Biomass Plant, and the low-odour potential of the materials to be processed.

5.2.4 The impact of emissions from vehicles travelling to and from the Cheney Manor Biomass Plant site were assessed and dismissed as insignificant due to the relatively low numbers, and the traffic management procedures that will be implemented by the developer.

5.3 Flood Risk

- 5.3.1 The development site is situated within an area designated as Flood Risk Zone 1 by the Environment Agency, but is liable to flooding in extreme rainfall due to surface water flowing onto the site from adjoining properties. A detailed flood risk assessment has been prepared and submitted as part of this application, and the Environment Agency has confirmed the conclusions to be acceptable, and that the Cheney Manor Biomass Plant is an appropriate development for the selected location.
- 5.3.2 The development of the Cheney Manor Biomass Plant incorporates improvements to surface water run off from the site that will benefit the local area by controlling the flow off-site of rainwater falling onto the ground on-site.

5.4 Noise

- 5.4.1 A detailed noise assessment has been undertaken which involved an environmental noise measurement programme at several locations in the vicinity of the Cheney Manor Biomass Plant site. Measurements were undertaken during daylight and at night time to determine the sensitivity of residential and commercial premises to potential noise levels associated with the operation of the Cheney Manor Biomass Plant.
- 5.4.2 The noise performance characteristics of major components within the Cheney Manor Biomass Plant were used to predict noise levels at the sensitive receptor locations when the facility becomes operational. The results from the modelling studies indicated that noise levels were likely to be of marginal significance at nearby residential and commercial premises, and unlikely to be a reasonable cause of nuisance complaints.
- 5.4.3 A detailed noise assessment report is included in the Environmental Assessment report that is provided to support the planning application.

5.5 Transportation

- 5.5.1 A detailed transport assessment was undertaken as part of the environmental assessment to support the planning application. The assessment demonstrated that the peak hour trips generated by the proposal, once it is operational, will be small in number particularly taking into account the shift system that will be in place. The timing of the shifts will be such that staff can avoid the peak traffic periods on the adjacent highway network, which will be beneficial both to them and the network itself.
- 5.5.2 HGV movements will be controlled by Pure Green Ltd to ensure that peak hour movements are mostly avoided. Twenty four hour operation of the Cheney Manor Biomass Plant and those of their Clients will allow movements to be made when flows on the local network are low which again will be beneficial both to them and the network itself.
- 5.5.3 The existing site entrance that will be used by the Cheney Manor Biomass Plant meets current standards and provides excellent visibility for emerging vehicles.

- 5.5.4 The Cheney Manor Biomass Plant site lies in a reasonably sustainable location with good access to public transport and is well situated to make use of pedestrian/cycle links to the town centre of Swindon. Secure cycle facilities will be provided for use by the operatives whilst on site parking will be limited.
- 5.5.5 The site lies in an industrial location and it therefore accords with local and national planning policy objectives of re-developing sites in appropriate locations, which provide access to sustainable travel alternatives thus reducing the dependency on private car use.
- 5.5.6 A detailed transport assessment report is included in the Environmental Statement that is provided to support the planning application.

5.6 Ground Contamination

- 5.6.1 A ground contamination desk study was undertaken to assess the possible existence and extent of any historical contamination that may be present beneath the ground at the development site.
- 5.6.2 The assessment concluded that previous industrial use of the development site was unlikely to have been the cause of ground contamination. The whole site is covered in either concrete or tarmac hardstanding, which will have reduced the potential infiltration into the ground of any polluting substances that may have been spilled accidentally. It is recognised, however, that there may have been historical spillages or leakage not apparent from the walkover.
- 5.6.3 Contamination as a result of the operation of the Cheney Manor Biomass Plant is unlikely due to controls that are proposed and which will be required as conditions of the Environmental Permit, regulated by the Environment Agency.

5.7 Visual Appearance

- 5.7.1 The Cheney Manor Biomass Plant development is situated in Darby Close, Swindon, in an area that is predominantly industrial in character, and the development of the animal bedding manufacturing facility on the site will be in keeping with land use in the surrounding area. Proposals to mitigate the visual impact of the new process buildings to be erected on the development site are primarily concerned with the selection of a variable colour scheme.
- 5.7.2 The Cheney Manor Biomass Plant development site is not overlooked by residential or similarly sensitive receptors, and it is considered that the proposed development can be installed at this location without detriment to the visual amenity of the area.

5.8 Ecology

- 5.8.1 There are no designated ecological habitats in close proximity to the development site that required detailed ecological assessment. The Wiltshire and Swindon Biological Records Centre was consulted on the matter and advised that there were several County Wildlife Sites in the vicinity of the development site that may be affected by emissions from the biomass CHP plant. A detailed assessment of the impact of emissions from the biomass CHP plant on these local habitat sites was undertaken in relation to Critical Levels and site-specific Critical Loads, which demonstrated that the impact would be insignificant.

5.9 Water Quality and Supply

- 5.9.1 Consideration has been given to the water to be discharged from the Cheney Manor Biomass Plant with reference to applicable regulations.

Surface Water Discharge

- 5.9.2 The Cheney Manor Biomass Plant will incorporate Sustainable Drainage Systems (SuDS) wherever practicable. This will include rainwater harvesting from the roofs of the Cheney Manor Biomass Plant buildings which will be used to supplement the feedwater requirements of the cooling towers.

- 5.9.3 Rainwater falling elsewhere on the site will be collected by a new surface water drainage system to be installed as part of the development of the site. The new drainage system will incorporate interceptors that will separate hydrocarbons and silts from the rainwater prior to discharge to the River Ray. This represents a significant improvement over the current situation as there are no interceptors evident in the existing surface water drains, with the risk of contaminants flowing unchecked into the river with the potential to cause damage to the aquatic environment.

Effluent Discharges

- 5.9.4 All process effluent, which will be predominantly blow down water from the boilers and the cooling towers, will be discharged to sewer following treatment to recover some of the water for re-use in the cooling system.

Water Usage

- 5.9.5 The majority of the water consumed by the Cheney Manor Biomass Plant will be supplied by the mains water supply, and will be used to replace process water discharged from the boilers and cooling towers as part of standard blow down procedures. The mains water supply will be supplemented by rainwater collected from the roofs of the buildings, for use in the cooling towers.

5.10 Archaeology and Cultural Heritage

- 5.10.1 The EIA screening and scoping opinion that was provided by Swindon BC confirmed that the development site is not located within a historical or archaeological site of significance. Accordingly, no further assessment was required.

5.11 Socio-Economic Factors

- 5.11.1 The Cheney Manor Biomass Plant will have a significant positive impact on the economy, at both the local and regional level, through the creation of a number of temporary and long-term jobs during its construction and operation. There will also be opportunities for local businesses to tender for contracts associated with the construction phase of the Cheney Manor Biomass Plant, as well as provision of the ongoing programme of preventative maintenance that will be required to ensure reliable and efficient operation.
- 5.11.2 Once operational it is expected that the Cheney Manor Biomass Plant will require 100 full-time staff. This will include a wide range of skills and expertise including senior management, electrical and mechanical engineering, process operation, maintenance engineers, clerical staff, etc., with salaries commensurate with what would be expected for such a high prestige environmental development.
- 5.11.3 Pure Green Ltd propose to recruit the principal members of the operational staff during the early part of the construction phase to enable personnel to participate in the construction and installation of the equipment associated with the Cheney Manor Biomass Plant. This will form part of the on-site training and induction that will be given to all staff to ensure that they are familiar with all aspects of the process prior to operation, which will minimise delays that might otherwise occur if personnel were not recruited until the construction phase was completed.
- 5.11.4 Pure Green Ltd is keen to develop an informed and committed workforce that will take pride in being part of the Cheney Manor Biomass Plant team. By involving people early on in the construction phase, Pure Green Ltd hope to develop a feeling of “ownership” and “belonging” amongst the workers, that will encourage them to develop a long term career within the company, and not to regard their employment as a transient phase in the development of their personal curriculum vitae.
- 5.11.5 The Cheney Manor Biomass Plant will also benefit rural communities in the wider Yorkshire and Humber region, in relation to forestry and woodland management that will be enhanced in order to increase the sustainability of the timber supplies required for the wood pellet manufacturing process. There is also likely to be a number of indirect jobs created in the provision of biomass feedstocks for the two biomass CHP plants.

5.12 Environmental Management

- 5.12.1 A formal Environmental Management Plan will be produced as part of the project to ensure that contractors adhere to high environmental standards and the work meets formal planning conditions and license requirements.

6. Summary and Conclusions

- 6.1.1 The Cheney Manor Biomass Plant will manufacture 50,000 tonne per year of animal bedding and wood pellets. The associated biomass combined heat and power (CHP) plant will provide all of the heat and power requirements of the manufacturing facility as well as exporting surplus power in the form of renewable electricity to the local distribution network.
- 6.1.2 The generating capacity of the biomass CHP plant is sufficient to provide the needs of approximately 9,000 homes, and the Cheney Manor Biomass Plant as a whole is expected to result in savings of at least 14,500 tonnes of carbon dioxide annually. The biomass CHP plant will utilise renewable recycled wood biomass fuels which would otherwise be sent to landfill, or incinerated.
- 6.1.3 The Environmental Assessment report that accompanies this application demonstrates that the potential environmental impact of the Cheney Manor Biomass Plant is acceptable and where potentially significant impacts have been identified, appropriate mitigation measures have been proposed. The development site is considered to be suitable for the proposed use by the Cheney Manor Biomass Plant.
- 6.1.4 Local, regional and national planning policy is supportive of the Cheney Manor Biomass Plant which will assist in addressing the important issues of climate change as well as assisting Swindon to increase the amount of renewable energy generated within the borough.
- 6.1.5 The Cheney Manor Biomass Plant will therefore realise numerous benefits, including:
- The provision of a sustainable source of animal bedding replacing the requirement to import the same material from continental Europe;
 - The generation of renewable energy, addressing local, regional and national objectives, capable of providing the power requirements of Swindon households from renewable sources of energy;
 - Diverting recycled wood from landfill and recovering its resource value in the form of renewable electricity and heat;
 - Enabling the re-development of a partially vacant, brownfield site in an important location for Swindon;
 - Creating a significant number of direct and indirect jobs for the local community, as well as in rural communities connected with woodland and forestry management; and,
 - Developing a quality, well designed building that will significantly enhance the visual amenity of the Cheney Manor Industrial Estate.
- 6.1.6 It is therefore considered that the planning application for the Cheney Manor Biomass Plant should be positively determined by Swindon BC, with appropriate conditions.