



## The Millbrook Power (Gas Fired Power Station) Order

### 5.2 Consultation Report Appendices – Volume 5 Appendices 5.A – 5.G

Planning Act 2008  
The Infrastructure Planning  
(Applications: Prescribed Forms and Procedure) Regulations 2009

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## Consultation Report Appendices Volume 5 index

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5.A	Non-statutory local community consultation: Table showing exhibition feedback form responses and how MPL has taken response into account		
5.B	Phase 1 Section 42: Consultation responses as received		<b>Section 42(a) consultees</b>
			1. Anglian Water
			2. Bedfordshire Fire and Rescue Service
			3. Canal and River Trust
			4. Chilterns Conservation Board
			5. Civil Aviation Authority
			6. Energetics
			7. English Heritage
			8. Environment Agency
			9. Fisher German on behalf of GPSS
			10. Fulcrum
			11. GTC Pipelines Limited
			12. Health and Safety Executive
			13. Highways Agency
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			15. Independent Pipelines Limited
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			18. McNicholas (TATA and KPN)
			19. Millbrook Parish Meeting
			20. Ministry of Defence
			21. National Grid (joint response from NGET and NGG)
			22. NATs Safeguarding
			23. Natural England
			24. Public Health England
			25. Quadrant Pipelines Limited
			26. Southern Gas Network
			27. The Coal Authority
			28. The Electricity Network Company Limited
			29. Public Health England
			<b>Section 42(b) consultees</b>

		1. Bedford Borough Council
		2. Central Bedfordshire Council
		3. North Hertfordshire Council
		4. Wellingborough Council
		<b>Section 42(d) consultees</b>
		1. Covanta Energy Limited
		2. O-MIL-s42-ST-PBA-L-96
		3. O-MIL-s42-ST-PBA-L-133
		4 .O-MIL-s42-ST-PBA-L-100
		5. Joanne Gray
<b>5.C</b>	Phase 2 Section 42: Consultation responses as received as of 22nd September 2017	Anglian Water Services Limited
		Bedford Borough Council
		Buckinghamshire County Council
		Central Bedfordshire Council
		Chilterns Conservation Board
		CLH Pipelines Limited
		East of England Ambulance Service
		ESP Connections Ltd
		Historic England - East of England Brooklands
		Houghton Conquest Parish Council
		Marston Moreteyne Parish Council
		McNicholas [KPN Networks]
		McNicholas [TATA Networks]
		Milton Keynes Council
		National Grid Electricity Transmission plc and National Grid Gas plc
		Natural England
		Network Rail Infrastructure Ltd
		Public Health England
		Royal Mail Group
		s42-112
		s42-162
		Secretary of State for Defence
		South Cambridgeshire District Council
		Southern Gas Networks plc
		St Albans City & District Council
		The Canal and River Trust PSSC
		The Coal Authority
		The Environment Agency
		The Health and Safety Executive
		Wales and West Utilities Ltd



			Wellingborough Borough Council
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**Appendix 5.A: Non-statutory local community consultation: Table showing exhibition feedback from responses and how MPL has taken responses into account**

Question	Responses	How MPL has taken the response into account
Is there anything you would like to see done differently at the next round of exhibitions?	Better Advertising	<p>The non-statutory exhibitions were publicised as follows:</p> <ul style="list-style-type: none"> <li>■ Letters delivered to the local community representatives</li> <li>■ Letters were also delivered to circa 10,500 residents addresses in the local community approximately within a 5km radius of the Site as defined in the Core Consultation Zone (CCZ).</li> <li>■ The exhibitions were advertised in the local media via a press release that was issued on 30th May 2014.</li> <li>■ A direct advert for the exhibition was also published in the Bedfordshire on Sunday and posters were also put up within close vicinity to the site and exhibition locations.</li> </ul> <p>MPL considered this to be a robust approach. A similar approach was followed for the section 48 publicity, pursuant to section 48 of PA 2008.</p>
	Relationship with Covanta and creep of subsequent growth	As stated in the Planning Statement (Doc Ref. 10.1) Covanta's DCO came into force on 28 <sup>th</sup> February 2013. The DCO was formally issued on 25 <sup>th</sup> March 2013 (Appendix 3) with a signed s106 agreement. Schedule 1 Part 2 (1) of the

Question	Responses	How MPL has taken the response into account
		<p>DCO ('Time limits') sets out a requirement that, "The authorised development may commence no later than the expiration of 5 years beginning with the date that this Order comes into force."</p> <p>Following the issue of the DCO, Covanta's parent company withdrew from operations in the UK (Minerals and Waste Local Plan: Strategic Sites and Policies (MWLP:SSP) (2014), Paragraph 7.18) and the development has not proceeded.</p> <p>Covanta is a separate company, unrelated to MPL.</p>
	A model of the site	MPL did not provide a model of the site however additional visual materials including maps, visualisations, wireframes and photomontages of the proposals at the section 47 public exhibitions.
	More detail and information regarding the proposals	<p>The preliminary findings of environmental assessment were presented in the PEIR, which was available at the section 47 public exhibitions.</p> <p>The final findings are contained within the ES</p>

Question	Responses	How MPL has taken the response into account
		that accompanies the Application.
	Knowledge of the area and local issues	<p>MPL undertook a non-statutory and statutory phase of consultation to give local people the opportunity to review the proposals, ask the project team questions, and provide feedback. This includes any feedback on local issues and knowledge of the area.</p> <p>In addition, technical specialists, on behalf of MPL, as part of the Environmental Impact Assessment have undertaken baseline studies on the local area in respect of each technical area to understand the existing local context. MPL also engaged with the local authorities (Central Bedfordshire Council and Bedford Borough Council) to enhance local knowledge and ensure local issues were captured in the EIA.</p>
	No. Well presented, all questions answered, explanations given when information was not available.	MPL notes this.
	Better idea of visual impact, including landscaping	MPL provided additional information on visual impacts at the statutory s47 local community exhibitions through the inclusion of wireframe drawings as shown in Appendix 3.V.ii which shows the figures on display at the exhibition.

Question	Responses	How MPL has taken the response into account
	Additional exhibition (Houghton Conquest)	<p>Non-statutory exhibitions were held between 5<sup>th</sup> and 7<sup>th</sup> June at:</p> <ul style="list-style-type: none"> <li>■ Lidlington Village Hall</li> <li>■ Stewartby Village Hall</li> <li>■ Marston Moreteyne Village Hall</li> </ul> <p>For the section 47 statutory consultation, as publicised in the section 48 notices, exhibitions were held at the following locations:</p> <ul style="list-style-type: none"> <li>■ Marston Moretaine Village Hall</li> <li>■ Stewartby Village Hall</li> <li>■ Ampthill Masonic Centre</li> <li>■ Lidlington Village Hall</li> </ul> <p>Ampthill Masonic Centre was added as an action from a non-statutory meeting with CBC on 19<sup>th</sup> May (Appendix 3.F). These locations are considered to capture the main population areas within the Parish Councils that are within close proximity to the site. Both exhibitions at Stewartby and Ampthill are within close proximity to Houghton Conquest. MPL obtained input and agreement on the exhibition locations</p>

Question	Responses	How MPL has taken the response into account
		from the local authorities.
	Speakers with a Q&A session	Members of the project team were on hand at both the non-statutory consultation events and the statutory section 47 events to assist members of the public with the interpretation of material that was made available. The materials that were made available include an overview of the project, the Applicant, the need for the project, community benefits, environment and planning/consultation.
	Access to maps	Maps were provided at the Non-Statutory exhibitions. Furthermore MPL provided additional information on visual impacts at the statutory s47 local community exhibitions through the inclusion of wireframe drawings as shown in Appendix 3.V.ii which shows the figures on display at the exhibition.
	Detail regarding stack height, noise and emissions	<p>The preliminary findings of environmental assessment were presented in the PEIR, which were available at the section 47 public exhibitions. This included a detailed description of the project.</p> <p>The detailed project description and final findings are contained within the ES that</p>

Question	Responses	How MPL has taken the response into account
	Find somewhere else	<p>accompanies the Application. The draft Development Consent Order (document reference 3.1) in Schedule 2 (Requirement 2) confirms the maximum stack height at 35m. The likely significant effects on noise and air quality are addressed in the ES (Doc. Ref 6.1).</p> <p>MPL has undertaken an extensive site selection prior to selecting Rookery South Pit. This process identified that the Rookery site had the following key advantages:</p> <ul style="list-style-type: none"> <li>■ Close proximity to the national gas and electricity distribution networks;</li> <li>■ Within an area identified as being potentially suitable for energy infrastructure;</li> <li>■ the Generating Equipment Site is within previously developed land, lying below ground level;</li> <li>■ it has a well-developed road network for access to the Project Site;</li> <li>■ the Project Site is outside of areas at risk of flooding; and</li> </ul>



Question	Responses	How MPL has taken the response into account
		<ul style="list-style-type: none"> <li>■ there is adequate space to develop the Power Generation Plant and integral infrastructure.</li> </ul> <p>These details were provided in the PEIR which was available at the section 47 public exhibitions.</p>
	Environmental impact	<p>The preliminary findings of environmental assessment were presented in the PEIR, which was available at the section 47 public exhibitions.</p> <p>The final findings are contained within the ES that accompanies the Application.</p>
	Electrical connection, underground cables	<p>MPL held an outreach meeting with PINS on 26<sup>th</sup> November 2014 in order to discuss the project and specific issues including taking into account the comments expressed during the statutory consultation phase, and as a result of feedback received at the outreach meeting and during parallel discussions with National Grid, MPL confirmed its intention to disregard both overhead line options and pursue an underground cable option.</p>

Question	Responses	How MPL has taken the response into account
	Tea, coffee and biscuits	MPL have noted this comment.
	Provide engagement for children	Table 3.5 of the Consultation Report (Document Ref. 5.1) sets out the additional effort made to contact hard to reach groups that includes schools and the youth parliament.
Based on the information at today's event, what comments would you like to make about our proposal?	Reduce visual impact of stacks	<p>A number of technology options have been considered for the Power Generation Plant: Single Cycle Gas Turbine (SCGT) plant, Combined Cycle Gas Turbine (CCGT) plant and Reciprocating Gas Engines (RGE) plant. One consideration influencing the choice for using SCGT is because these plants require shorter stack(s) compared to CCGT, and therefore are less visually intrusive in views from the surrounding environment.</p> <p>A stack height sensitivity study has been undertaken for the Project to determine the minimum stack height for the Gas Turbine Generators, required for adequate dispersion of emissions and to meet legislative air quality targets. The DCO Application has a height range for the stacks of between 30m and 35m.</p> <p>The plant will be sited in the Rookery pit, which will have a finished ground level of</p>

Question	Responses	How MPL has taken the response into account
		<p>approximately 15m below ground level (bgl). Therefore the stacks will be visible approximately 20m above ground level.</p> <p>The landscape and visual impacts of the Project have been assessed by undertaking field visits and producing photomontages of the plant from key viewpoints which have been agreed with statutory consultees including CBC.</p>
	<p>Understanding the country's need for power in the future the site seems ideal</p>	<p>The Need for new energy infrastructure, and fossil fuel infrastructure, is established in NPS EN-1 and NPS EN-2.</p> <p>MPL has undertaken an extensive site selection process. This process identified that the Rookery site had a number of key advantages.</p>
	<p>Proposal seems to take account of local concerns, at present, and in general is in keeping with the locality and size is not a concern compared to Covanta.</p>	<p>MPL has noted this comment.</p>
	<p>Stewartby does not need any more industrial units at all. No Covanta, no power station or anything else.</p>	<p>MPL has undertaken an extensive site selection process, investigating around 600 sites in total over the past three years. This process identified that the Rookery site had the following key advantages:</p>

Question	Responses	How MPL has taken the response into account
		<ul style="list-style-type: none"> <li>■ Close proximity to the national gas and electricity distribution networks;</li> <li>■ Within an area identified as being potentially suitable for energy infrastructure;</li> <li>■ the Generating Equipment Site is within previously developed land, lying below ground level;</li> <li>■ it has a well-developed road network for access to the Project Site;</li> <li>■ the Project Site is outside of areas at risk of flooding; and</li> <li>■ there is adequate space to develop the Power Generation Plant and integral infrastructure.</li> </ul>
	<p>The lower the stacks the better. Could they be made to look like the existing brick chimneys?</p>	<p>A number of technology options have been considered for the Power Generation Plant: SCGT plant: Combined Cycle Gas Turbine (CCGT) plant and Reciprocating Gas Engines (RGE) plant. A key consideration in the choice for using SCGT is because these plants require shorter stack(s) compared to CCGT and</p>

Question	Responses	How MPL has taken the response into account
		<p>therefore are less visually intrusive in views from the surrounding environment.</p> <p>A stack height sensitivity study has been undertaken for the Project to determine the minimum stack height for the Gas Turbine Generators, required for adequate dispersion of emissions and to meet legislative air quality targets. The height range for the stacks would be between 30m and 35m.</p> <p>The design of any structures would be informed by MPL's design principles; these are set out in the Design and Access Statement (Document 10.2). These principles seek to minimise the impacts of the project on the environment and visual amenity.</p>
	<p>Better than Covanta but unsure about suitability in light of housing development plans for Marston and Houghton Conquest/ Stewartby/ The Wixams</p>	<p>New housing developments have been listed within the Planning Statement (Document Reference 10.1) and considered within the cumulative impacts within section 4 of the ES (Document Ref 6.1)</p>
	<p>It needs to directly benefit Marston and Stewartby. It needs not be an advertisement for other 'dirty' industry.</p>	<p>The proposed Heads of Terms agreement (Document Ref 10.3) proposes an Education and Employment Scheme as well as a Local</p>

Question	Responses	How MPL has taken the response into account
		<p>Services scheme. Assuming Project related employment generated average levels of GVA, the Project's operation would provide approximately £1.4m GVA (section 14 of the Environmental Statement (Document Reference 6.1))</p>
	<p>The proposal seems to be more acceptable than the earlier Covanta waste incinerator proposal.</p>	<p>MPL notes this comment.</p>
	<p>Would like the stacks to be minimum height if possible</p>	<p>A number of technology options have been considered for the Power Generation Plant: Single Cycle Gas Turbine (SCGT) plant, Combined Cycle Gas Turbine (CCGT) plant and Reciprocating Gas Engines (RGE) plant. A key consideration in the choice for using SCGT is because these plants require shorter stack(s) compared to CCGT, and therefore are less visually intrusive in views from the surrounding environment.</p> <p>A stack height sensitivity study has been undertaken for the Project to determine the minimum stack height for the Gas Turbine Generators, required for adequate dispersion of emissions and to meet legislative air quality targets. The height range for the stacks would be between 30m and 35m.</p>

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	<p>Once the site has been completed, a screening project should be implemented. An effort should be made to only build one plant on this site (which should not be Covanta!)</p>	<p>The findings of an environmental impact assessment are contained within the ES that accompanies the Application. This includes an assessment of landscape and visual effects.</p> <p>The iterative EIA process has informed the final design, including the landscape and visual assessment, along with consultee comments. Furthermore, an outline Landscape and Ecology Mitigation Strategy (Document 6.2) and Outline Landscaping Plans (Document 6.2) have been developed for the Project.</p> <p>MPL are continuing a level of engagement with Covanta and have taken this project into consideration in assessing the likely significant cumulative effects of the Project, however, Covanta are responsible for any future proposals for their site.</p>
	<p>This is an excellent use of a brownfield site</p>	<p>MPL notes this comment.</p>
	<p>None of the information took any account of the effect on local people.</p>	<p>The preliminary findings of environmental assessment were presented in the PEIR, which was available at the section 47 public exhibitions.</p>

Question	Responses	How MPL has taken the response into account
		<p>The findings of an environmental impact assessment are contained within the ES that accompanies the Application. This includes the residual likely significant effects on any local receptors identified.</p>
	<p>How will we utilise any unused capacity? (output)</p>	<p>The Generating Equipment would operate as a peaking plant, with maximum operational hours not exceeding 1500 hours per year. It would operate at times of peak demand and system stress events when generation from renewable sources is reduced, and would be called upon by the National Grid to maintain capacity on the system.</p>
	<p>We are a rural village and don't want a huge power station/ incinerator close to our village. We've been blighted by rubbish tips and brickworks and perhaps it is someone else's turn to have this sort of development.</p>	<p>An EIA has been undertaken assessing both the project's impact and the cumulative impact of the Project and other projects in the area – see section 4 of the ES (Document Reference 6.1). Watt Power are developing 3 other similar projects at Eye in Suffolk, at Hirwaun in South Wales, and at Abergelli near Swansea.</p>
	<p>I see the need nationally but not yet again at the proposed location. Marston Moretaine is being swamped by various projects. This was a small compact village but is now becoming a dormitory for Bedford/ MK</p>	<p>The Planning Statement (Document Reference 10.1) states that, on balance, the likely benefits of the Project significantly outweigh any potential adverse impacts of the Project. These benefits include (amongst others) the improvements to the appearance and condition</p>



Question	Responses	How MPL has taken the response into account
		of the Power Generation Plant site, the local and regional economic benefits, and the considerable public benefit to meeting the national need for flexible gas generation.
	Seems appropriate for what is, after all, a brownfield site.	MPL notes this comment.
	Keep the chimneys as low as possible	<p>A number of technology options have been considered for the Power Generation Plant: Single Cycle Gas Turbine (SCGT) plant, Combined Cycle Gas Turbine (CCGT) plant and Reciprocating Gas Engines (RGE) plant. One consideration in the choice for using SCGT is because these plants require shorter stack(s) compared to CCGT, and therefore are less visually intrusive in views from the surrounding environment.</p> <p>A stack height sensitivity study has been undertaken for the Project to determine the minimum stack height for the Gas Turbine Generators, required for adequate dispersion of emissions and to meet legislative air quality targets. The height range for the stacks would be between 30m and 35m.</p>
	I'm ok with it.	MPL notes this comment.

Question	Responses	How MPL has taken the response into account
	<p>The proposal to site building in the pit is fine. The impact of the stacks is the problem.</p>	<p>In terms of air quality section 6 of the ES (Document Ref. 6.1). The assessment presented above has shown that the Project will not result in any likely significant environmental effects in relation to air quality either as a standalone project or cumulatively with other projects. The stack height will be between 30 – 35 m from the base of the height. The Pit within which the stacks are located is 15 m below the surrounding ground area meaning that the stacks are ~ 20 m above the surrounding ground level.</p>
	<p>My concern is that this development might bring other worse industrial developments, such as Covanta, or something more detrimental to the environment.</p>	<p>MPL isn't responsible for and can't control other developments. Any new project would require its own planning permission which would also be subject to public consultation. The area surrounding the proposal is allocated within the subject to their own assessments and controls.</p>
	<p>It sounds a very good idea (on paper)</p>	<p>MPL notes this comment. Further details are provided within the Application submitted to the examination.</p>
	<p>Good use of land, especially if landscaped.</p>	<p>MPL has sought to follow the guidance in NPS EN-1 and NPS EN-2 and embed good design within the proposals. More information can be found in the Design and Access Statement (Document 10.2). Furthermore, an outline</p>

Question	Responses	How MPL has taken the response into account
		Landscape and Ecology Mitigation Strategy (Document 6.2) and Outline Landscaping Plans (Document 6.2) have been developed for the Project.
	What happens in the years to come if gas supplies become restricted? It is sad that the beauty of the local woodlands will possibly be spoiled by more chimneys	Section 11 of the ES (Document Reference 6.1) concludes that the resulting significance of cumulative landscape effects would be either minor significant or not significant.
	Screening with trees/ vegetation essential	An outline Landscape and Ecology Mitigation Strategy (Document Ref 6.2) and Outline Landscaping Plans (Document 6.2) have been developed for the Project.
	As a neighbour and as part of the forest of Marston Vale I would welcome a further conversation	Pursuant to section 47 of the PA 2008, statutory consultation for the Project provided further opportunity for the community to review and discuss the Project. Statutory 48 notices were published from 2 October 2014, and exhibitions were held at Marston Moretaine Village Hall (31 October 2014), Stewartby Village Hall (1 November 2014), Ampthill Masonic Centre (3 November 2014) and Lidlington Village Hall (4 November 2014).
	I find it difficult to believe a power station with 200m investment will only run 65 days a year. I think it is a sprat to catch a mackerel	Need for new energy infrastructure, and fossil fuel infrastructure, is established in NPS EN-1 and NPS EN-2.

Question	Responses	How MPL has taken the response into account
		<p>There is growing acknowledgement within Government policy and industry that established renewable technologies cannot provide the security of supply that consumers require. DECC currently forecast a need for ~42 GW of new Gas and Nuclear generation between 2012-2030. The type of gas generation required post 2020 must be more flexible to support intermittent wind.</p> <p>The plant will operate as a ‘peaking plant’ operating for a maximum 1500 hours per year. This number of hours will be secured in the DCO.</p>
	As a peak time (clean) source of electricity I am in favour but await detailed proposals.	MPL notes this comment. Further details are provided within the Application submitted to the examination.
	Concerned about where gas will come from- I am very opposed to fracking and concerned about supplies from Russia- they may be cut off without notice.	The Project would obtain gas from the National Gas Transmission System: this gas may be derived from a variety of sources. The UK has a diverse and wide ranging supply of gas sources including Norway, the north Sea, LNG ships from Qatar etc
	Commercially viable. Questionable location	MPL commercial proposals are based on a Funding Statement (Document Reference 4.2)

Question	Responses	How MPL has taken the response into account
		<p>which supports the application.</p> <p>MPL has undertaken an extensive site selection process, investigating around 600 sites in total over the past three years. This process identified that the Rookery site had the following key advantages:</p> <ul style="list-style-type: none"> <li>■ Close proximity to the national gas and electricity distribution networks;</li> <li>■ Within an area identified as being potentially suitable for energy infrastructure;</li> <li>■ the Generating Equipment Site is within previously developed land, lying below ground level;</li> <li>■ it has a well-developed road network for access to the Project Site;</li> <li>■ the Project Site is outside of areas at risk of flooding; and</li> <li>■ there is adequate space to develop the Power Generation Plant and integral infrastructure.</li> </ul>

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	<p>It is completely the wrong location, adjacent to the Millennium country park. Marston Vale is being re-generated from its former industrial use. A power station goes completely against that. This could encourage other unsuitable development.</p>	<p>The site is designated for energy use</p>
	<p>Currently opposed as too many unanswered issues. Stack height, size and number need to be minimised. No details of how or to extent of screening.</p>	<p>A stack height sensitivity study has been undertaken for the Project to determine the minimum stack height for the Gas Turbine Generators, required for adequate dispersion of emissions and to meet legislative air quality targets. The height range for the stacks would be between 30m and 35m.</p> <p>The findings of an environmental impact assessment are contained within the ES that accompanies the Application. This includes an assessment of landscape and visual effects.</p> <p>The iterative EIA process has informed the final design, including the landscape and visual assessment, along with consultee comments. Furthermore, an outline Landscape and Ecology Mitigation Strategy (Document 6.2) and Outline Landscaping Plans (Document 6.2) have been developed for the Project.</p>
	<p>A good use of the land and the country needs the</p>	<p>Need for new energy infrastructure, and fossil</p>

Question	Responses	How MPL has taken the response into account
	extra power	<p>fuel infrastructure, is established in NPS EN-1 and NPS EN-2.</p> <p>There is growing acknowledgement within Government policy and industry that established renewable technologies cannot provide the security of supply that consumers require. DECC currently forecast a need for ~42 GW of new Gas and Nuclear generation between 2012-2030. The type of gas generation required post 2020 must be more flexible to support intermittent wind.</p>
	I am worried about the height of the stack however I feel they could be coloured to effectively blend in.	<p>MPL has sought to follow the guidance in NPS EN-1 and NPS EN-2 and embed good design within the proposals. More information can be found in the Design and Access Statement (Document 10.2). Furthermore, an outline Landscape and Ecology Mitigation Strategy (Document 6.2) and Outline Landscaping Plans (Document 6.2) have been developed for the Project.</p>
	There is, as far as I can see, very little benefit to the community from the project. Very few jobs and it's next to a country park. I feel it would be a catalyst for other (possibly larger) projects.	<p>The proposed Heads of Terms agreement (Document Ref 10.3) proposes an Education and Employment Scheme as well as a Local Services scheme. Assuming Project related employment generated average levels of GVA,</p>

Question	Responses	How MPL has taken the response into account
	<p>Positive- low vehicle movement, smaller than Covanta, less emissions. Negative- Up to 60 foot stacks that break the skyline still not wanted.</p>	<p>the Project's operation would provide approximately £1.4m GVA (section 14 of the Environmental Statement (Document Reference 6.1))</p> <p>A number of technology options have been considered for the Power Generation Plant: Single Cycle Gas Turbine (SCGT) plant, Combined Cycle Gas Turbine (CCGT) plant and Reciprocating Gas Engines (RGE) plant. A key consideration in the choice for using SCGT is because these plants require shorter stack(s) compared to CCGT, and therefore are less visually intrusive in views from the surrounding environment.</p> <p>A stack height sensitivity study has been undertaken for the Project to determine the minimum stack height for the Gas Turbine Generators, required for adequate dispersion of emissions and to meet legislative air quality targets. The height range for the stacks would be between 30m and 35m.</p> <p>Section 11 of the ES (Document Reference 6.1) concludes that the resulting significance of cumulative landscape effects would be either minor significant or not significant.</p>



Question	Responses	How MPL has taken the response into account
		<p>MPL has sought to follow the guidance in NPS EN-1 and NPS EN-2 and embed good design within the proposals. More information can be found in the Design and Access Statement (Document 10.2). Furthermore, an outline Landscape and Ecology Mitigation Strategy (Document 6.2) and Outline Landscaping Plans (Document 6.2) have been developed for the Project.</p>
	<p>I am supportive of this proposal- local power generation, low environmental impact, low visual impact from the local viewpoints.</p>	<p>MPL notes this comment.</p>
	<p>Better than Covanta but need more details</p>	<p>MPL notes this comment. Further details are provided within the Application submitted to the examination.</p>
<p>What further information would you like to be made available about this project?</p>	<p>None</p>	<p>MPL notes this comment.</p>
	<p>Noise levels, emissions, what will it look like from our village</p>	<p>Section 7 of the ES (Document Reference 6.2) deals with Noise and concludes that the results of the assessment have shown that the Project will result in a likely significant adverse impact at South Pillinge Farmhouse however at the other worst affected NSRs, the Project will not generally result in any likely significant adverse impacts. This has been concluded for the Project as a standalone project or cumulatively</p>

Question	Responses	How MPL has taken the response into account
		<p>with other projects.</p> <p>Section 6 of the ES (Document Reference 6.2) deals with Air Quality and concludes that the Project will not result in any likely significant environmental effects in relation to air quality either as a standalone project or cumulatively with other projects, having regard to the design and proposed operation of the project and embedded mitigation.</p>
	<p>Better info on running hours expected, especially night time. Noise emission data, based not only on estimates but on actual data from equivalent sites.</p>	<p>The Generating Equipment is being promoted to meet peak demand and system stress events. Peak demand typically occurs between 0700 and 2300 hrs. It is therefore very unlikely that the plant would run overnight with the exception of emergencies. The noise assessment is contained within section 7 of the ES (Doc Reference 6.1). The noise assessment is predicting no significant effects on residential receptors.</p>
	<p>The future growth and expansion of the other plans for the pit</p>	<p>MPL isn't responsible for and can't control other developments. Any new project would require its own planning permission which would also be subject to public consultation. The area surrounding the proposal is allocated within the</p>

Question	Responses	How MPL has taken the response into account
		subject to their own assessments and controls.
	The likely effects on existing flora and fauna.	No likely significant effects have been identified as a result of construction, operation or decommissioning of the Project. See section 8 of the ES (Document Reference 6.1)
	More details as and when available and to be kept informed of progress	<p>The Statement of Community Consultation (SoCC) is a statement describing how MPL proposed to consult the local community about the Project. In accordance with section 48 of the PA, MPL published notices in national and local press, and on site explaining where the SoCC can be viewed, and a summary of the process moving forwards.</p> <p>MPL has sought to make available further information on the project as and when it's available. MPL issued information updates to people in the local and surrounding area including those parties that registered to receive those information updates.</p>
	Any changes in size or output. Any extra builds i.e. pylons etc.	The Project has evolved technical studies and consultation. MPL has kept the local people informed through information updates / exhibitions and meetings with local and parish councils.

Question	Responses	How MPL has taken the response into account
	True proposals. How it will benefit the people of Marston Vale and not the bank accounts of people in Edinburgh.	The proposed Heads of Terms agreement (Document Ref 10.3) proposes an Education and Employment Scheme as well as a Local Services scheme. Assuming Project related employment generated average levels of GVA, the Project's operation would provide approximately £1.4m GVA (section 14 of the Environmental Statement (Document Reference 6.1))
	I don't need any	MPL note this comment
	Ongoing, as plans develop and design crystallised.	MPL note this comment
	An absolute guarantee that the power source will not be changed ie it remains gas powered	The Application is to construct, operate and maintain a gas fired power plant and connections on land in Rookery South Pit. Therefore if awarded, the DCO will require a gas fired power plant to be constructed.
	Keep us informed about future proposals on the old Covanta project	MPL will continue to liaise with Covanta to ensure there are discussions on the two Projects. Covanta is however, responsible for providing any updates on this Project.
	More information on environmental impacts-wildlife and emissions	The preliminary findings of environmental assessment were presented in the PEIR, which was available at the section 47 public exhibitions.

Question	Responses	How MPL has taken the response into account
		<p>The final findings are contained within the ES that accompanies the Application. The findings of an environmental impact assessment are contained within the ES that accompanies the Application. This includes assessments of ecology and air quality.</p> <p>No likely significant effects have been identified as a result of construction, operation or decommissioning of the Project. See Chapter 8 of the ES (Document Reference 6.1)</p> <p>The air quality assessment has shown that the Project will not result in any likely significant environmental effects in relation to air quality either as a standalone project or cumulatively with other projects. See Chapter 6 of the ES (Document Reference 6.1)</p>
	<p>Height of stack from top of pit. Position of alignment of stacks in relation to Marston Park. Confirmation of electricity connection from plant to NG. Confirmation as to whether NG proposes to extend existing assets to plant will they be buried?</p>	<p>The max height of the stack(s) from the top of the Pit will be 20 m (this is 35 m from the base of the Pit). The Electrical Connection will be undergrounded from the existing 400 kV line to the substation which will be located adjacent to the Generating Equipment inside the Pit. The electrical cables connecting the substation to</p>

Question	Responses	How MPL has taken the response into account
		<p>the existing 400 kV line will be buried.</p> <p>The Gas Connection would be in the form of a new underground gas pipeline connection (the Pipeline) between a purpose built above ground installation (AGI) (to be installed at the connection point with the NTS) and the Generating Equipment.</p>
	<p>More details and progress reports in time</p>	<p>The Statement of Community Consultation (SoCC) is statement describing how MPL proposed to consult the local community about the Project. In accordance with section 48 of the PA, MPL published notices in national and local press, and on site explaining where the SoCC can be viewed, and a summary of the process moving forwards.</p> <p>MPL has sought to make available further information on the project as and when it's available. MPL issued information updates to people in the local and surrounding area including those parties that registered to receive those information updates.</p>
	<p>Traffic. Local employment opportunities.</p>	<p>The proposed Heads of Terms agreement</p>

Question	Responses	How MPL has taken the response into account
		<p>(Document Ref 10.3) proposes an Education and Employment Scheme as well as a Local Services Scheme. Information on the traffic assessment can be found in Chapter 12 of the ES (Document Reference 6.1)</p>
	<p>It is a bit vague at the moment</p>	<p>The preliminary findings of environmental assessment were presented in the PEIR, which was available at the section 47 public exhibitions. Full details of the proposals are included in the ES (document reference 6.1).</p>
	<p>Full detail on stack heights, pollution levels and noise levels.</p>	<p>The preliminary findings of the environmental assessment were presented in the PEIR, which was available at the section 47 public exhibitions. Full details of the proposals are included in the ES.</p> <p>The findings of an environmental impact assessment are contained within the ES that accompanies the Application. This includes an assessment of air quality and noise. Stack heights are confirmed to be between 30 and 35 m from the bottom of the Pit.</p> <p>The air quality assessment has shown that the Project will not result in any likely significant environmental effects in relation to air quality</p>

Question	Responses	How MPL has taken the response into account
		<p>either as a standalone project or cumulatively with other projects. See Chapter 6 of the ES (Document Reference 6.1)</p> <p>The noise assessment is contained within section 7 of the ES (Doc Reference 6.1). The noise assessment is predicting no significant effects on residential receptors.</p>
	<p>Comments from professional impartial bodies regarding this and existing familiar projects.</p>	<p>The s42 consultees are listed within the Consultation Report Appendix 3.O (Document Reference 5.2).</p>



## **Appendix 5.B: Phase 1 Section 42 Consultation responses as received**



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Huntingdon, Cambridgeshire, PE29 6YJ  
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TOWN & COUNTRY PLANNING ACT 2008 AND THE INFRASTRUCTURE PLANNING  
(EXAMINATION PROCEDURE) RULES 2010

STATEMENT BY ANGLIAN WATER SERVICES LIMITED

Millbrook Power Ltd: Proposed gas fired power plant at Rookery South Pit, Nr Mill  
Brook, Bedfordshire

Anglian Water Reference: LDF/SP15

14 November 2014

## 1. Introduction

Anglian Water Services Limited ("Anglian Water") is appointed as the water and sewerage undertaker for the Anglian region, by virtue of an appointment made under the Water Industry Act ("WIA") 1991. Anglian Water is a wholly owned subsidiary of AWG plc. The principal duties of a water and sewerage undertaker are set out in the WIA.

Anglian Water is the statutory water supply provider and sewerage undertaker in part of the location of the proposed gas fired power plant at Rookery South Pit, Nr Mill Brook, Bedfordshire.

Anglian Water is considered a statutory consultee for the proposed gas fired power plant at Rookery South Pit, Nr Mill Brook, Bedfordshire under section 42 of the Planning Act (2008) and Regulation 3 of the Infrastructure Planning (Applications: Prescribed Forms and Procedures) Regulations 2009.

## 2. Anglian Water's Interests

### **Assets Affected**

Our records show that there are water mains or other assets owned by this company within the proposed Power Plant and temporary construction areas. In relation to these assets, having laid the asset under statutory notice, Anglian Water would require the standard protected easement widths for these assets and for any requests for alteration or removal to be conducted in accordance with the Water Industry Act 1991 and Protective Provisions will be sought by Anglian Water.

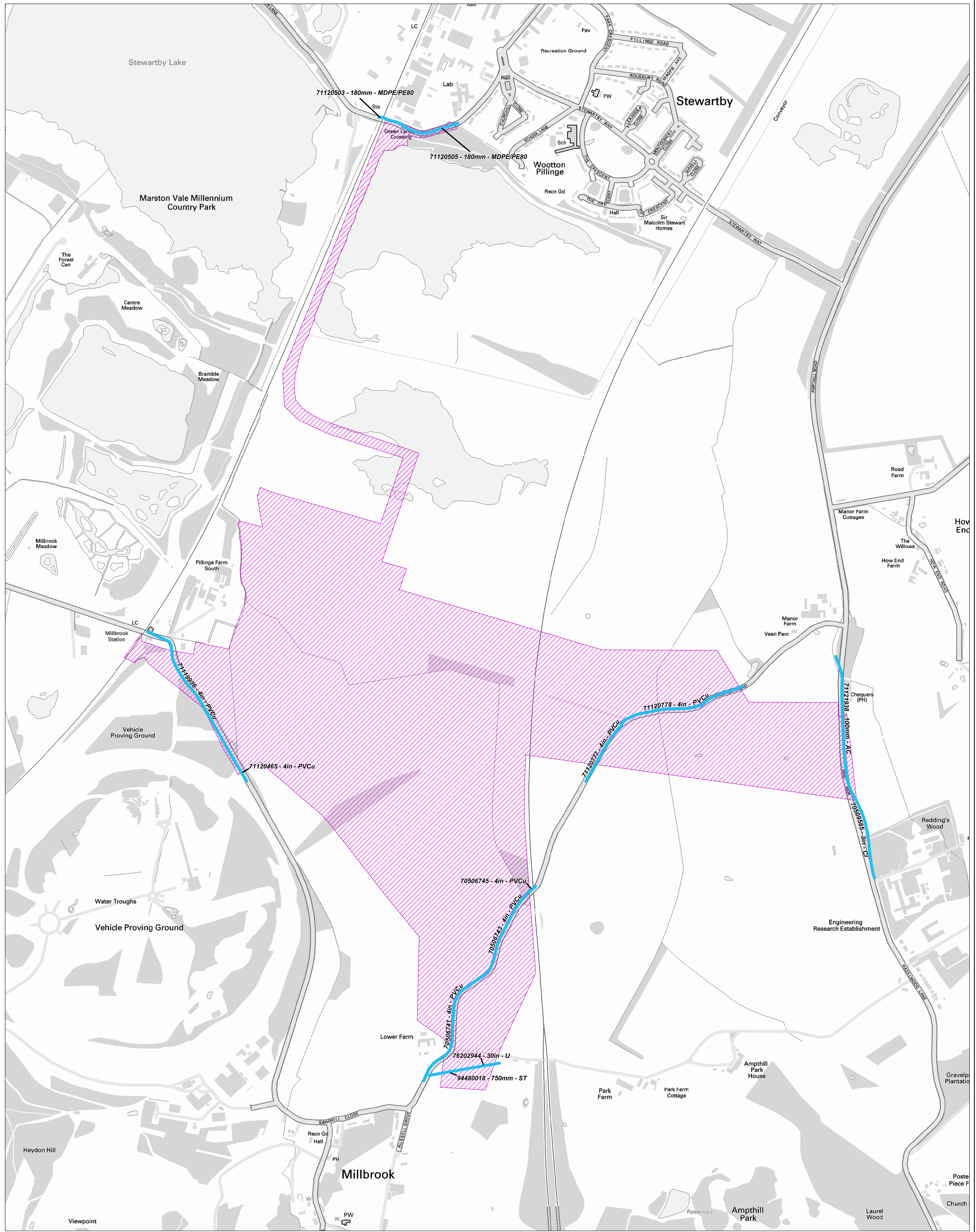
Plans indicating the assets affected by the Power Plant are attached together with a schedule indicating the assets affected.

## **Summary**

Anglian Water reserves the right to make further representations on development proposals in the future.

ASSET_NU	ASSET_TY	QUOTED_	DIAM_UN	INTERNAL_	ROUGH_COE	RELINING	ACTUAL_L						
MBER	MATERIAL	PE	DIAM	IT	DIAMETER	FFICIENT	CLASS	_TYPE	ENGTH	FEATURE_STATE_DESC	OWNERSHIP_DESC	LIQUID_TYPE_DESC	NGR
76202944	U	WMN	30 in		762		U	U	105.893	In Service	Anglian Water Services	Potable	TL0182439050
71120777	PVCu	WMN	4 in				U	U	239.407	In Service	Anglian Water Services	Potable	TL0222440104
70506741	PVCu	WMN	4 in				U	U	496.288	In Service	Anglian Water Services	Potable	TL0172239211
70506743	PVCu	WMN	4 in				U	U	254.845	In Service	Anglian Water Services	Potable	TL0190139521
71121938	AC	WMN	100 mm		100		U	U	420.69	In Service	Anglian Water Services	Potable	TL0302240210
	MDPE/PE												
71120503	80	WMN	180 mm		146	NA	U		38.795	In Service	Anglian Water Services	Potable	TL0149242214
71119936	PVCu	WMN	4 in				U	U	553.044	In Service	Anglian Water Services	Potable	TL0086040294
70509585	CI	WMN	3 in		76		U	U	338.016	In Service	Anglian Water Services	Potable	TL0310239844
71120778	PVCu	WMN	4 in				U	U	423.749	In Service	Anglian Water Services	Potable	TL0249440242
70506745	PVCu	WMN	4 in				U	U	33.725	In Service	Anglian Water Services	Potable	TL0198539638
71120465	PVCu	WMN	4 in				U	U	64.927	In Service	Anglian Water Services	Potable	TL0101640027
	MDPE/PE												
71120505	80	WMN	180 mm		146	NA	U		247.261	In Service	Anglian Water Services	Potable	TL0162042163
94480018	ST	WMN	750 mm		750	NA	U		131.208	In Service	Anglian Water Services	Potable	TL0170739029





**Legend**

Development Sites	Water Towers	Raw Mains Between 150 and 300mm
Water Abstraction	Borehole Site	Raw Mains Above 300mm
Water Treatment Works	Water Pumping Station	Potable Mains Under 150mm
Treated Water Reservoir	Water Mains Unknown	Potable Mains Between 150 and 300mm
Raw Water Reservoir	Raw Mains Under 150mm	Potable Mains Above 300mm
		Contours

This plan is provided by Anglian Water pursuant to its obligations under the Water Industry Act 1991 sections 198 or 199. It must be used in conjunction with any search results attached. The information on this plan is based on data currently recorded but the position must be regarded as approximate. Service pipes, private sewers and drains are generally not shown.

Users of this map are strongly advised to commission their own survey of the area shown on the plan before carrying out any works. The actual position of all apparatus MUST be established by trial holes. No liability whatsoever, including liability for negligence, is accepted by Anglian Water for any error or inaccuracy or omission, including the failure to accurately record, or record at all, the location of any water mains, discharge pipe, sewer or drain or disposal main or any item of apparatus.

This information is valid for the date printed. The plan is produced by Anglian Water Services Limited, from Ordnance Survey © Crown Copyright, 1988/1997. This map is to be used for the purposes of viewing the location of Anglian Water plant only. Any other use of the map data or further copies are not permitted. This notice is not intended to exclude or restrict liability for death or personal injury resulting from negligence.

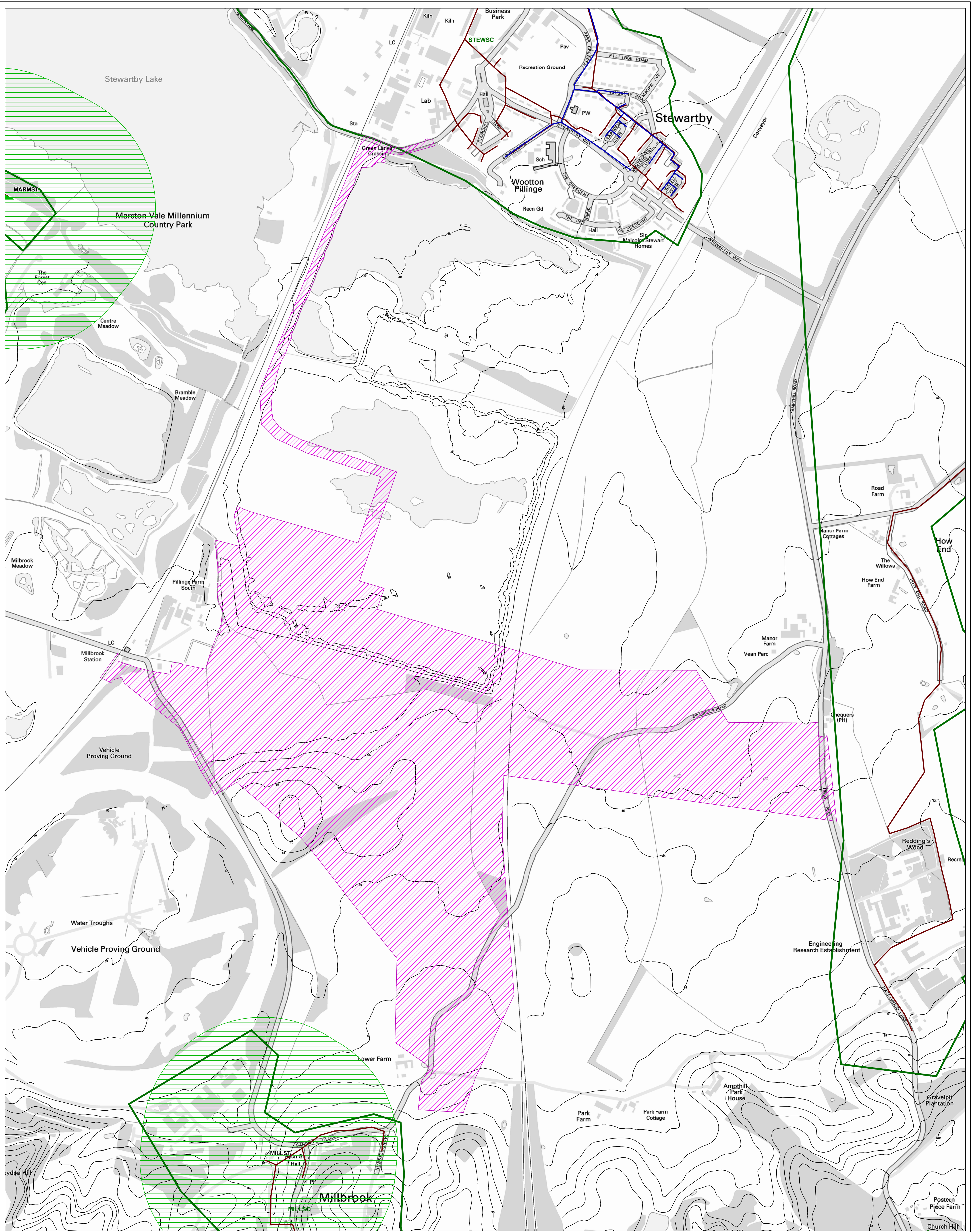
Asset Data Management Centre  
 Anglian Water Services Ltd.  
 Henderson House, 4 Lancaster Way  
 Ermine Business Park, Huntingdon  
 PE29 7DU  
 Tel : 01480 325849  
 Email: AID\_Team@Geodesys.Com

Drawing No: A2177	Sheet No.: 1 OF 1	Scale: 1 : 5,500
Workspace Name: Water.gws		
File Location: S:\SSPS\Requests and Services\AID Requests\2177		
Drawn: RS	Checked: RS	Approved: RS
		Date: 03/11/14

ISSUE NO.	COMMENTS	DATE	AUTH.
REVISION DETAILS			
Drawing Title:			
<b>Millbrook Power Station Proposed Redline Boundaries with Affected Water Assets</b>			







Legend			
	Development Sites		Terminal Pumping Station
	Sewer Catchments		Inline Pumping Station
	DG5 Overloaded		Sewage Treatment Works
	Overflow		15m Buffer for Pumping Stations
	Contours		400m Buffer for Cordon Sanitaire
	Combined Sewers		Surface Sewers
	Foul Sewers		

This plan is provided by Anglian Water pursuant to its obligations under the Water Industry Act 1991 sections 196 or 199. It must be used in conjunction with any search results attached. The information on this plan is based on data currently recorded but the position must be regarded as approximate. Service pipes, private sewers and drains are generally not shown.

Users of this map are strongly advised to commission their own survey of the area shown on the plan before carrying out any works. The actual position of all apparatus MUST be established by trial holes. No liability whatsoever, including liability for negligence, is accepted by Anglian Water for any error or inaccuracy or omission, including the failure to accurately record, or record at all, the location of any water main, discharge pipe, sewer or drain or disposal main or any item of apparatus.

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Asset Data Management Centre Anglian Water Services Ltd. Henderson House, 4 Lancaster Way Ermine Business Park, Huntingdon PE29 7DU Tel : 01480 325849 Email: AID_Team@Geodesys.Com			
Drawing No: A2177	Sheet No: 1 OF 1	Scale: 1 : 5,500	
Workpace Name: WW_gws			
File Location: S:\SSPS\Requests and Services\AID Requests\2177			
Drawn: RS	Checked: RS	Approved: RS	Date: 03/11/14

ISSUE NO.	COMMENTS	DATE	AUTH.
REVISION DETAILS			
Drawing Title: <b>Millbrook Power Station Proposed Redline Boundaries with Water Recycling Assets</b>			





# Bedfordshire Fire and Rescue Service

Date: 14.10.14

Name:  
Telephone:  
Email:

Please respond to:  
GC A Peckham

Mr Paul Wormald  
Director of Planning for Waste and Energy  
Peter Brett Assoc LLP  
16 Brewhouse Yard  
Clerkenwell  
London  
EC1V 4LJ

Dear Mr Wormald

## Millbrook Power Station, Rockery South Pit, Millbrook – Regulation 11

I am in receipt of your letter to CFO Fuller ref PGW/MPL (received 30 September) in relation to the Environmental Impact Assessment for the proposed Millbrook Power Station for Bedfordshire.

This letter acknowledges receipt of your correspondence and BFRS will now consider the information provided through your website [www.millbrookpower.co.uk](http://www.millbrookpower.co.uk) and discuss the implications with colleagues within the Local Resilience Forum.

A further response will follow if we consider there to be any additional questions or concerns that are raised specific to us.

In the meantime, I thank you on behalf of CFO Fuller for your communication.

Yours sincerely,



**GC Andy Peckham**  
Response Support Manager

CC FSM  
ERPO  
SC Am/Wo/Sh  
BLLRF secretarial

Peter Brett Associates LLP	
Client	
Project	
File No	
Date	
15 OCT 2014	
Authorised	
Distribution	
605	

**Chief Fire Officer: Paul M Fuller QFSM MSc BSc FIFireE MInstLM**

Southfields Road, Kempston, Bedford, MK42 7NR Tel. 01234 845000 Fax. 01234 845035



**From:** [Jane Hennell](mailto:Jane.Hennell@millbrookpower.co.uk)  
**To:** [millbrookpower.co.uk](http://millbrookpower.co.uk)  
**Subject:** PEIR resposne  
**Date:** 10 November 2014 15:49:42

---

Thank you for your letter dated 7 October 2014 in respect of the above.

The Canal & River Trust (the Trust) is a company limited by guarantee and registered as a charity. The Trust has a range of charitable objectives including:

- To hold in trust or own and to operate and manage inland waterways for public benefit, use and enjoyment;
- To protect and conserve objects and buildings of heritage interest;
- To further the conservation, protection and improvement of the natural environment of inland waterways; and
- To promote sustainable development in the vicinity of any inland waterways for the benefit of the public.

The following comments are provided in our capacity as a consultee identified in Section 42 of the Planning Act 2008.

The Canal & River Trust own and manage the Grand Union Canal and supports the creation of a new waterway link between Bedford & Milton Keynes in this area. The proposed Millbrook Power Station is not near any canal owned or managed by the Canal & River Trust, and as such we have no comments to make in relation to this project. However In due course we may wish to comment on haul routes or power lines if they affect the rand Union canal or route of the new Bedford & Milton Keynes waterway.

Kind regards

Jane Hennell  
Area Planner South

The Canal & River Trust  
The Dock Office  
Commercial Road  
Gloucester  
GL1 2EB

Tel. [REDACTED]

---

The Canal & River Trust is a new charity entrusted with the care of 2,000 miles of waterways in England and Wales. Get involved, join us - Visit / Donate / Volunteer at [www.canalrivertrust.org.uk](http://www.canalrivertrust.org.uk) - Sign up for our newsletter at [www.canalrivertrust.org.uk/newsletter](http://www.canalrivertrust.org.uk/newsletter)

Canal & River Trust is a charitable company limited by guarantee registered in England & Wales with company number 7807276 and charity number 1146792. Registered office address First Floor North, Station House, 500 Elder Gate, Milton Keynes MK9 1BB.

Elusen newydd yw Glandwr Cymru sy'n gofalu am 2,000 o filltiroedd o ddyfrffyrdd yng Nghymru a Lloegr. Cymerwch ran, ymunwch â ni - Ewch i Rhoddion a Gwirfoddoli yn [www.glandwrcymru.org.uk](http://www.glandwrcymru.org.uk)

Mae Glandwr Cymru yn gwmni cyfyngedig drwy warant a gofrestrwyd yng Nghymru a Lloegr gyda rhif cwmni 7807276 a rhif elusen gofrestredig 1146792. Swyddfa gofrestredig: First Floor North, Station House, 500 Elder Gate, Milton Keynes MK9 1BB.

**From:** [Colin White](#)  
**To:** [millbrookpower.co.uk](mailto:millbrookpower.co.uk)  
**Subject:** Gas fired power plant at Rookery South Pit, Millbrook, Bedfordshire  
**Date:** 14 October 2014 12:01:50  
**Attachments:** [image001.jpg](#)

---

Dear Sir,

Thank you for consulting the Chilterns Conservation Board in connection with the proposed gas fired power plant at Rookery South Pit near Millbrook.

I am writing to let you know that the Chilterns Conservation Board has no comments to make on the proposal.

Best wishes,

Colin White

## **Colin White MRTPI**

Planning Officer  
Chilterns Conservation Board  
The Lodge  
90 Station Road  
Chinnor  
Oxon OX39 4HA

Tel: [REDACTED]

[office@chilternsaonb.org](mailto:office@chilternsaonb.org)

[www.chilternsaonb.org](http://www.chilternsaonb.org)

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**From:** [Smailes Baggy](mailto:Smailes.Baggy@millbrookpower.co.uk)  
**To:** [millbrookpower.co.uk](mailto:millbrookpower.co.uk)  
**Cc:** [REDACTED]  
**Subject:** Proposed Millbrook Power Project – Preliminary Environmental Impact Report (PEIR) Comment  
**Date:** 16 October 2014 12:19:33

---

Dear Sirs,

## **Proposed Millbrook Power Project – Preliminary Environmental Impact Report (PEIR) Comment**

Thank you for your recent correspondence that sought Civil Aviation Authority comment associated with the proposed Millbrook Power Project. I trust the following, which draws from information contained within the PEIR Non-Technical Summary (NTS) and is fundamentally in line with related comment provided for the Planning Inspectorate at the scoping stage, is useful.

We note from the PEIR NTS that the tallest related structures are expected to be between a maximum of 5x40m high stacks each associated with a gas turbine generator and, in addition to existing electricity transmission towers, 6 new transmission towers (pylons) which would each be a maximum of 45m high. It is assumed that these heights are measured above ground level. On that basis we believe the following (potential) issues are worthy of consideration:

- **Aerodromes.** In respect of any potential aerodrome related issue, we note the close proximity of Cranfield Airport to the development site. Given that aerodrome safeguarding responsibility rests in all cases with the relevant aerodrome operator / licensee, not the CAA, we believe it important that Cranfield Airport's related viewpoints is established and any concerns expressed appropriately taken into account. You will see that we have copied this correspondence to the Cranfield Airport Manager.
- **Aviation Warning Lighting:**
  - In the UK, the need for aviation obstruction lighting on 'tall' structures depends in the first instance upon any particular structure's location in relationship to an aerodrome. If the structure constitutes an 'aerodrome obstruction' it is the aerodrome operator that with review the lighting requirement. For civil aerodromes, they will, in general terms, follow the requirements of CAP 168 - Licensing of Aerodromes. This document can be downloaded from the Civil Aviation CAA website at [www.caa.co.uk/docs/33/CAP168.PDF](http://www.caa.co.uk/docs/33/CAP168.PDF) - Chapter 4 (12.8) refers to obstacle lighting.
  - Away from aerodromes Article 219 of the UK Air Navigation Order applies. This Article requires that for en-route obstructions (ie away from aerodromes) lighting only becomes legally mandated for structures of a height of 150m or more. However, structures of lesser high might need aviation obstruction lighting if, by virtue of their location and nature, they are considered a significant navigational hazard.
  - Cranes, whether in situ temporarily or long term are captured by the points heighted above. Note that if a crane is located on top of another

structure, it is the overall height (structure + crane) than is relevant.

- In this case, given the assumed maximum height of 45m, Article 219 would not apply. In the event that there is no aerodrome issue, in this case related to Cranfield Airport, we can advise that the CAA would not in isolation make any case for lighting.
- Gas Venting and/or Flaring. It is assumed that the facility is not intended to vent or flare gas either routinely or as an emergency procedure such as to cause a danger to overlying aircraft. If that is not the case parties are invited to use myself as an appropriate point of contact for any further related discussion.
- Aviation Promulgation. There is a civil aviation requirement in the UK for all structures over 300ft (91.4m) high to be charted on aviation maps. It follows that, at a maximum of 45m, aside of any Cranfield Airport requirement, there is no en-route (ie non-aerodrome specific) civil aviation charting requirement. However, if crane usage in the construction phase involves heights of 300ft or more, the temporary structure will need to be appropriately notified. For temporary structures this notification can be achieved through the publication of a **Notice to Airmen** (NOTAM). If needed by virtue of temporary use of cranes such that the 300ft threshold is breached a NOTAM can be arranged through the developer providing related details to the CAA's Airspace Utilisation Section ([ausops@caa.co.uk](mailto:ausops@caa.co.uk) / 0207 453 6599).
- Military Aviation. For completeness, the Ministry of Defence position in regards to the proposed development and military aviation activity should be established.
- I should also add that that due to the unique nature of associated operations in respect of operating altitudes and potentially unusual landing sites, it would also be sensible to establish the related viewpoint of local emergency services air support units.

I believe that any associated Development Consent Order (or equivalent / similar) would be expected to acknowledge and where applicable address the issues highlighted above.

Whilst none of the above negates any aforementioned need to consult in line with Government requirements associated with the safeguarding of aerodromes and other technical sites (Government Circular 1/2003 refers), we hope this information matches your requirements. Please do not hesitate to get in touch if you require any further comment or needs clarification of any point.

**Mark Smailes**

Airspace Regulator  
Safety and Airspace Regulation Group  
Civil Aviation Authority  
CAA House  
45-59 Kingsway  
London WC2B 6TE

Tel: [REDACTED]

\*\*\*\*\*

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## Rhiannon Parrett

---

**Subject:** FW: PGW/MPL

---

**From:** Louise O'raw [mailto: [REDACTED] ]  
**Sent:** 08 October 2014 12:00  
**To:** Paul Wormald  
**Subject:** PGW/MPL

Dear Sir/Madam,

Thank you for submitting your recent plant enquiry.

Based on the information provided, I can confirm that Energetics **does not** have any plant within the area(s) specified in your request.

Please be advised that it may take around 10 working days to process enquiries. In the unlikely event that you have been waiting longer than 10 working days, or require further assistance with outstanding enquiries, please call 01698 404945.

Please ensure all plant enquiries are sent to [plantenquiries@energetics-uk.com](mailto:plantenquiries@energetics-uk.com)

Regards

**Louise O'Raw**  
Technical Clerical Team

Energetics Design & Build  
International House  
Stanley Boulevard  
Hamilton International Technology Park  
Glasgow  
G72 0BN

t: [REDACTED]  
f: [REDACTED]

e: [REDACTED]  
w: [www.energetics-uk.com](http://www.energetics-uk.com)

---

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because we were impressed by the usability and clarity of the delivery system, particularly in comparison to the paper-based montages we normally contend with.

Mike Spence of MSENIRONMENTAL, and his website is [www.msenvironmental.co.uk](http://www.msenvironmental.co.uk)

Finally I understand that this may not be possible but it would be very useful to have clarity about the status of the Covanta scheme. As discussed at the meeting yesterday the power plant is relatively modest in comparison to the Covanta building, however the accumulation of impact is potentially significant.

Yours Sincerely

Will Fletcher

---

Dr Will Fletcher | Inspector of Ancient Monuments (Beds, Norfolk and Suffolk)

Tel: [REDACTED]

Mob: [REDACTED]

English Heritage | Brooklands | 24 Brooklands Avenue | Cambridge | CB2 8BU.

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Millbrook Power Limited  
49 York Place  
Edinburgh  
EH1 3JD

**Our ref:** AC/2014/121264/02-L01  
**Your ref:** EN010068  
**Date:** 04 November 2014

Dear Sir/Madam

**PLANNING ACT 2008 (AS AMENDED) AND THE INFRASTRUCTURE PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2009 (AS AMENDED) – STAUTORY CONSULTATION UNDER SECTION 42 OF THE PLANNING ACT BY MILLBROOK POWER LTD FOR AN ORDER GRANTING DEVELOPMENT CONSENT FOR THE MILLBROOK POWER PROJECT MILLBROOK, BEDFORDSHIRE**

Thank you for your letter regarding the above mentioned site, which was received on 7 October 2014. We have reviewed the MPL PEIR and Scoping documents and wish to make the following comments:

**Flood Risk**

The requirement for a Flood Risk Assessment (FRA) and Surface Water Drainage Plan is understood.

The current proposals are to utilise the existing drainage system (associated with the Low Level Restoration Scheme) to discharge surface water from the new development. It must be clearly demonstrated that the system has sufficient capacity to cope with run-off from the new development for all events up to and including the 1 in 100 year storm, both now and in the future, and that the project does not increase risk to the site or third parties.

**Groundwater Protection**

A Foundation Works Risk Assessment (FWRA) will need to be produced to determine the risks to the underlying aquifers from proposed possible piled foundations, as much of the site is understood to be underlain by a shallow depth of clay above the Kellaways Sand (Secondary A Aquifer). A better understanding should be made to the sensitivity of the Blisworth Limestone Formation (Principal Aquifer), which we understand to be uplifted due to faulting to the north of the site. This highly sensitive aquifer may be adjacent to the proposed piles.

**Pollution Prevention**

We require further information regarding pollution prevention, such as arrangements during construction, operation and decommissioning of the proposal. Information on waste management is also recommended.

## Water Resources

It is the responsibility of the applicant to ensure that the development will not affect any water features (ie. wells, boreholes, springs, streams or ponds) in the area, including licensed and unlicensed abstractions. There are no licensed abstractions within 3km of this proposal.

The responsibility for the provision of a mains water supply lies with the water undertaker, Anglian Water Services. If the proposal will require the abstraction of water the applicant should be made aware that under the terms of the Water Resources Act 1991, an Abstraction Licence may be required from the Environment Agency for the abstraction of water from any inland water or underground strata. This is dependent on water resource availability and may not be granted.

If you require to de-water the site then you should be aware that this activity is currently exempt from requiring an abstraction licence but this activity is due to become licensable in the future. For further information the applicant should contact the Environment Agency National Permitting Service.

## Permitting

This proposal meets the thresholds of requiring an Environmental Permit. Due to the proposed size it will need to meet the requirements of Large Combustion Plant as defined by the Industrial Emissions Directive. A permit will only be issued where there is no significant impact to the environment.

As has been recommended previously, we encourage you commence pre-application discussions on your permit with us as soon as possible, so that your permit application can be parallel tracked with planning considerations.

Should you wish to discuss this matter further please do not hesitate to contact me.

Yours faithfully

**Neville Benn**  
**Senior Planning Advisor**  
**Sustainable Places**

Direct dial [REDACTED]

Direct e-mail [REDACTED]



Our Ref: AS/BE/MB/1990/AFF/RC/MC  
Unique Number: 142433  
Your Ref: PGW/MPL  
Date: 16.10.2014



FISHER GERMAN LLP  
GPSS  
PO BOX 7273  
ASHBY DE LA ZOUCH  
LEICESTERSHIRE  
LE65 2BY

**Telephone 0845 0701245**

Fax 0845 0701250

Email: [gpss@gpss.info](mailto:gpss@gpss.info)

For the attention of Mill Brook Power  
Peter Brett Associates LLP  
16 Brewhouse Yard  
Clerkenwell  
London  
EC1V 4LJ

Dear Sirs/Madam

### **GPSS – Government Pipeline and Storage System**

Thank you for your enquiry dated 7 October 2014. We can confirm that our client's apparatus, the Government Pipelines and Storage System (GPSS), may be affected by your proposals as indicated on the attached plan(s). The plan(s) supplied are intended for general guidance only and should not be relied upon for excavation or construction purposes. No guarantee is given regarding the accuracy of the information provided and in order to verify the accurate location of the pipeline in conjunction with your proposals you should contact OPA Central Services, to arrange a site visit. Their contact details are given below.

**OPA Central Services**  
**Ashdon Road**  
**Saffron Walden**  
**Essex, CB10 2NF**

**email:** [REDACTED]  
**Tel:** [REDACTED]

When contacting OPA Central Services, please quote the File Ref/Unique Number given at the top of this letter, which is specific to this enquiry. Please note that you should contact OPA Central Services within 28 days of the date of this letter in order to validate this enquiry otherwise it will become void.

You should note that the interests of the GPSS are conserved by means of the Land Powers (Defence) Act 1958, in particular Section 16 of the Act, and other legislation such as the Pipeline Safety Regulations 1996. It is, however, the Land Powers (Defence) Act 1958 that specifically prohibits any development and most intrusive activities within a GPSS Wayleave without specific consent from the Secretary of State for Defence. GPSS Wayleaves are generally 6 metres wide and bstride the pipeline 3 metres on either side and can incorporate other associated GPSS facilities.

OPA Central Services will be able to provide guidance on the required procedures for entering into a Section 16 Consent and provide confirmation on permitted development and intrusive activities. The whole process of obtaining Section 16 Consent can take between four and six weeks depending on circumstances at the time of application.

To reiterate, you should not undertake any work or activity without first contacting the GPSS Operator for advice and, if required, Section 16 Consent. For your additional information please visit <http://www.linesearchbeforeudig.co.uk/index.php/useful-info>, standard requirements for working/crossing Government pipelines.

You should also be aware that landowners and third parties have a duty of care not to carry out any works that have the potential to damage GPSS apparatus. This duty of care applies even if the works themselves are situated more than 3 metres from the pipeline. Examples of such works are mineral extraction, mining, explosives, piling and windfarms.



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A list of members' names is available for inspection at the Market Harborough office.  
Regulated by RICS.



Please note that implementation of any unapproved work that affects a GPSS Wayleave may result in serious consequences in terms of health and safety, expense and other attendant liabilities. In such cases it is the perpetrator of the act, together with any other promoting organisation, that shall be held fully accountable for any resulting damage.

Should you require any further assistance regarding this letter please contact the undersigned or alternatively, you can contact the OPA Central Services using the details provided above.

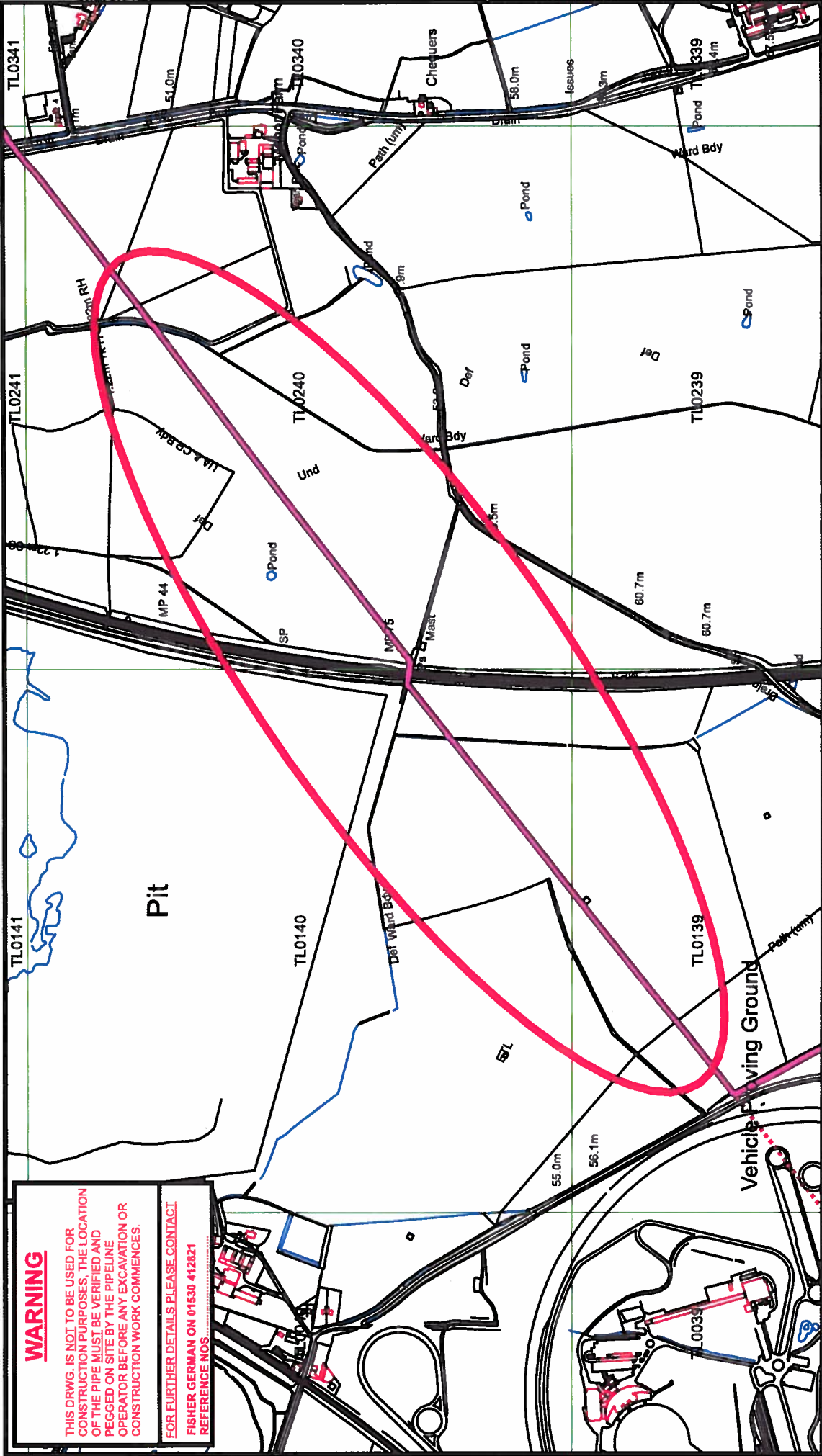
Yours faithfully

**For and on behalf of FISHER GERMAN LLP (GPSS LAND AGENT)**

Enc Location Plan

CC OPA Central Services  
Information for OPA Central Services  
Third Party Contact Details:





**WARNING**  
 THIS DRAWG. IS NOT TO BE USED FOR CONSTRUCTION PURPOSES. THE LOCATION OF THE PIPE MUST BE VERIFIED AND PEGGED ON SITE BY THE PIPELINE OPERATOR BEFORE ANY EXCAVATION OR CONSTRUCTION WORK COMMENCES.  
 FOR FURTHER DETAILS PLEASE CONTACT FISHER GERMAN ON 01530 412821 REFERENCE NOS

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Approximate position only  
 Contact Pipeline Operator  
 prior to works

"This plan must not be  
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 prior consent from  
 the office of origin."

**GPSS LOCATION PLAN EXTRACT  
 OF PIPELINE A/S(N)**

**Legend**  
 — GPSS PIPELINE

**DATE: OCT 2014**  
**NOT TO SCALE**

**FISHER GERMAN**  
 Fisher German LLP, The Grange  
 80 Tamworth Road, Ashby de la Zouch,  
 Leicestershire, LE65 2BW  
 Fax: 0845 0701250 and Telephone 0845 0701245  
 Email: gres@gpsa.info

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## Rhiannon Parrett

---

**Subject:** FW: Millbrook Power

**From:** &box\_FPLplantprotection\_conx, [<mailto:FPLplantprotection@fulcrum.co.uk>]  
**Sent:** 09 October 2014 10:57  
**To:** Paul Wormald  
**Cc:** 'info@millbrookpower.co.uk'  
**Subject:** Millbrook Power

Hi,

We can confirm that Fulcrum Pipelines Limited have no comments to make on the document received. Please note that we are constantly adding to our underground assets and would strongly advise that you consult us again prior to undertaking any excavations.

Other gas transporters may have plant in this locality which could be affected.

We will always make every effort to help you where we can, but Fulcrum Pipelines Limited will not be held responsible for any incident or accident arising from the use of the information associated with this search. The details provided are given in good faith, but no liability whatsoever can be accepted in respect thereof.

If you need any help or information simply contact Fulcrum on 03330 146 455

Yours sincerely,

DEBBIE TURNER  
Technical Administrator



Tel: 03330 146 455  
Direct Dial: [REDACTED]  
Email: [REDACTED]  
Web: [www.fulcrum.co.uk](http://www.fulcrum.co.uk)



## FULCRUM NEWS

### UTILITY SECTOR FIRST AS NEW UTILITY BUSINESS ALLIANCE IS LAUNCHED

We have officially launched a groundbreaking new 'alliance organisation' operating under the Fulcrum brand. [Learn more.](#)

### MAJOR WEBSITE REVAMP

We've unveiled a major website overhaul for [www.fulcrum.co.uk](http://www.fulcrum.co.uk). [Take a look.](#)

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**Rhiannon Parrett**

---

**Subject:** FW: PGW/MPL

**From:** [REDACTED] [[mailto:\[REDACTED\]](mailto:[REDACTED])]

**Sent:** 20 February 2015 09:16

**To:** Paul Wormald

**Subject:** PGW/MPL

Dear Sirs

With reference to the above I can confirm that the following have no comment to make at this moment in time.

Independent Pipelines Limited  
GTC Pipelines Limited  
Independent Power Networks Limited  
The Electricity Network Company Limited

Kind Regards

Maggie

Maggie Ketteridge  
*Engineering Support Officer*  
GTC  
Energy House  
Woolpit Business Park  
Woolpit  
Bury St Edmunds  
Suffolk, IP30 9UP  
Tel: [REDACTED]  
Fax: [REDACTED]  
E-mail: [REDACTED]  
Web: [www.gtc-uk.co.uk](http://www.gtc-uk.co.uk)

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HID Policy - Land Use Planning  
NSIP Consultations  
Building 5.S.2  
Redgrave Court  
Merton Road  
Bootle  
Merseyside  
L20 7HS

HSE email: [NSIP.applications@hse.gsi.gov.uk](mailto:NSIP.applications@hse.gsi.gov.uk)

Millbrook Power Ltd  
49 York Place  
Edinburgh  
EH1 3JD

Dear Sir / Madam,

13 November 2014

**Section 42 Planning Act 2008: Statutory Consultation**  
**- Millbrook Power Limited: Proposed Gas Fired Power Plant at Rookery South Pit, Nr. Millbrook, Bedfordshire**

Thank you for your letter of 7 October 2014 regarding the proposed Gas Fired Power Plant at Rookery South Pit, Nr. Millbrook, Bedfordshire

**HSE's land use planning advice**

Will the proposed project fall within any of HSE's consultation distances?

There is no intersection of the proposed site of the power generation plant on the consultation zones (CZs) of hazardous installations or major accident hazard pipelines (MAHPs).

The proposed draft development consent order (DCO) site boundary will fall within the CZs of the following MAHPs:

- The inner, middle and outer CZs of the 7 Feeder Old Warden/Slapton MAHP operated by National Grid Gas PLC (HSE Ref: 7592 / TRANSCO Ref: 1846),
- The inner, middle and outer CZs of the 9 Feeder Huntingdon/Whitwell MAHP operated by National Grid Gas PLC (HSE Ref: 7594 / TRANSCO Ref: 1848),
- The inner, middle and outer CZs of the 26 Feeder Willington/Steppingley MAHP operated by National Grid Gas PLC (HSE Ref: 9945 / TRANSCO Ref: 2722),

The DCO site boundary contains the electrical and gas connection opportunity areas. Depending on the route chosen, the intersection with CZs may be necessary in making the grid electrical connection. Intersection with CZs will be necessary when making the gas connection to either the 7 Feeder Old Warden/Slapton, the 9 Feeder Huntingdon/Whitwell or the 26 Feeder Willington/Steppingley MAHPs. With reference to HSE's LUP policy and the intersection with the existing MAHP CZs, we would not expect to be consulted on the grid electrical connection or the gas pipe laying and above ground installation (AGI) construction activities because they would not be relevant development types.

The proposed high pressure gas supply pipeline to the power generation plant may be a MAHP requiring notification under the Pipelines Safety Regulations 1996 (see <http://www.hse.gov.uk/pipelines/notification.htm>). On receipt of a notification, HSE would set LUP consultation zones around the pipeline that may affect future development that introduces new



populations along the pipeline route. HSE would be a statutory consultee on planning applications that fall within the CZs set for the new pipeline, and we would give our advice on such developments (either advise against or don't advise against) using the *Planning Advice for Developments Near Hazardous Installations Information Package (PADHI+)* methodology. Further information is available on the HSE website: <http://www.hse.gov.uk/landuseplanning/methodology.htm>

### **Explosives**

The proposed Gas Fired Power Plant at Rookery South Pit, Nr Millbrook, Bedfordshire development does not impinge on the separation distances of any explosives licensed site in the vicinity of the application.

### **Electrical Safety**

The project involves connections to electrical power distribution systems and has an impact on the existing generation, transmission and distribution assets on the UK mainland. In the light of that, HSE offers the following comments:

As well as satisfying general health and safety legislation (ie the Health and Safety at Work etc Act 1974 and supporting regulations), the proposed design and future operations must comply with the Electricity at Work Regulations 1989 and the Electricity, Safety, Continuity and Quality Regulations 2002 as amended. Generators, distributors, their contractors and others have defined duties in order to protect members of the public from the dangers posed by the electrical equipment used. HSE enforces the safety aspects of these regulations. If you have any doubts about the particular application of these regulations in terms of either the operation or construction of generators, substations, overhead lines or underground cables please contact Mr J C Steed, Principle Specialist Electrical Inspector, either at [REDACTED] or Rose Court GSW, 2 Southwark Bridge Road, London, SE1 9HS.

Please note that any further electronic communication on this project can be sent directly to the HSE designated e-mail account for NSIP applications the details of which can be found at the top of this letter.

Alternatively, hard copy correspondence should be sent to:

Miss Laura Evans  
NSIP Consultations  
5S.2 Redgrave Court  
Merton Road, Bootle  
Merseyside, L20 7HS

Yours faithfully,

[REDACTED]  
Laura Evans  
HID Policy - Land Use Planning

Our ref:  
Your ref: PGW/MPL

Jenny Volp  
Asset Manager - Area 8

Mr Paul Wormald  
Director of Planning for Waste and Energy

Woodlands  
Manton Lane  
Bedford MK41 7LW

Direct Line: [REDACTED]

sent via email to: info@millbrookpower.co.uk

19 November 2014

**For the attention of John Hopkins**

Dear Mr Wormald

**MILLBROOK POWER STATION, ROOKERY SOUTH PIT, MILLBROOK,  
BEDFORDSHIRE**

Thank you for your letter regarding the above proposal. I apologise for missing your deadline of 16 November for responses, however having already provided a copy of the technical note which the Highways Agency's consultants developed in response to your PEIR and also attending a meeting on 6 November to discuss any concerns we have, I trust that you have already received enough information from us so as not to hold up your processes. This letter now formalises our comments and they are listed below. Please feel free to contact me if you require further clarification.

**Trip generation:**

- The trips are split into vehicles per day and then peak hour trips. This is then split between those trips associated with the electrical connection and those associated with the power plant and gas connection. It seems that the vehicles per day trips are total two-way trips and peak hour trips are one way trips, but it is unclear from the table. Further clarity is needed on this in the Transport Assessment.
- I recommend that details of the anticipated number of trips are expanded upon within the Transport Assessment, listing both the number of arrivals and departures for the peak hours considered. This information should be presented for the worse case scenario reported, likely to be casting concrete foundation.
- I recommend that further evidence is provided in the Transport assessment to substantiate the figures for the Millbrook proposal, including when the peak hours occur, the number of construction workers likely to be on site and the assumed car occupancy.

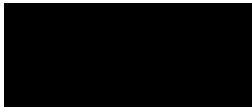
- I would like to see the impact on the affected Strategic Road Network junctions in order to confirm whether or not capacity assessments are required. I suggest that this is based on the worse-case scenario.


### **Routing of traffic:**

- Following the meeting on 6 November where the potential trip routing options were discussed, it was agreed that these are confirmed and details of all the routes made available in the Transport Assessment. The preferred routing options should also be clarified in the Transport Assessment. Preparation of an acceptable Route Management Strategy may remove the need for capacity assessments to be undertaken.

I trust these comments can be taken on board in the further work that you currently doing, please feel free to contact me if you need further clarification.

Yours sincerely



Jenny Volp  
ADT - Area 8  
Email: 

## Rhiannon Parrett

---

**Subject:** FW: Millbrook Power Ltd

---

**From:** Smith, Fiona [mailto: ]  
**Sent:** 17 October 2014 10:12  
**To:** Paul Wormald  
**Subject:** Millbrook Power Ltd

Please note confirmation of receipt of your consultation letter dated 7/10/2014.

Regards,  
Fiona

Fiona Smith  
Historical Railways Estate Team  
Highways Agency  
Hudson House | Toft Green | YORK | YO1 6HP  
Web: <http://www.highways.gov.uk>  
Tel: [REDACTED]  
Safe roads, reliable journeys, informed travellers  
Highways Agency, an executive agency of the Department for Transport

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**Rhiannon Parrett**

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**Subject:** FW: PGW/MPL

**From:** [redacted] [mailto:[redacted]]

**Sent:** 20 February 2015 09:16

**To:** Paul Wormald

**Subject:** PGW/MPL

Dear Sirs

With reference to the above I can confirm that the following have no comment to make at this moment in time.

Independent Pipelines Limited  
GTC Pipelines Limited  
Independent Power Networks Limited  
The Electricity Network Company Limited

Kind Regards

Maggie

Maggie Ketteridge  
*Engineering Support Officer*  
GTC  
Energy House  
Woolpit Business Park  
Woolpit  
Bury St Edmunds  
Suffolk, IP30 9UP  
Tel: [redacted]  
Fax: [redacted]  
E-mail: [redacted]  
Web: [www.gtc-uk.co.uk](http://www.gtc-uk.co.uk)

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**Rhiannon Parrett**

---

**Subject:** FW: PGW/MPL

**From:** [REDACTED] [[mailto:\[REDACTED\]](mailto:[REDACTED])]

**Sent:** 20 February 2015 09:16

**To:** Paul Wormald

**Subject:** PGW/MPL

Dear Sirs

With reference to the above I can confirm that the following have no comment to make at this moment in time.

Independent Pipelines Limited  
GTC Pipelines Limited  
Independent Power Networks Limited  
The Electricity Network Company Limited

Kind Regards

Maggie

Maggie Ketteridge  
*Engineering Support Officer*  
GTC  
Energy House  
Woolpit Business Park  
Woolpit  
Bury St Edmunds  
Suffolk, IP30 9UP  
Tel: [REDACTED]  
Fax: [REDACTED]  
E-mail: [REDACTED]  
Web: [www.gtc-uk.co.uk](http://www.gtc-uk.co.uk)

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**From:** [Hazel Trustam](#)  
**To:** [millbrookpower.co.uk](mailto:millbrookpower.co.uk)  
**Subject:** PEIR Response  
**Date:** 14 November 2014 10:41:13  
**Attachments:** [Preliminary Environmental Information Report response - 13.11.14.doc](#)

---

Please find attached response from Marston Moreteyne Parish Council. I would be grateful if you could acknowledge receipt.

Kind regards  
Hazel Trustam

*Mrs H. Trustam*  
*Clerk to Marston Moreteyne Parish Council.*

██████████

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# MARSTON MORETEYNE PARISH COUNCIL

**Clerk to the Council**

Mrs. HTrustam  
30 Armstrong Close  
Wilstead  
Bedford  
MK45 3EJ

Tel: [REDACTED]

Email: [REDACTED]

13<sup>th</sup> November 2014

Millbrook Power Limited  
49 York Place  
Edinburgh  
EH1 3JD

Dear Sir/Madam

Marston Moreteyne Parish Council wishes to formally submit its comments regarding the Preliminary Environmental Information Report for proposed Gas Fired Power Station project at Rookery South as follows:

1. The Parish Council acknowledges the fact that the chimney height has been reduced to 40m which will be an improvement visually. There is a need to see evidence of independent verification that will substantiate that emissions will be safe and that the chimneys are at the correct height. Concern was expressed in regard to inversion due to the location within the Marston Vale.
2. There is a strong requirement for supervised traffic management at the site entrance in Green Lane during the construction period. As mentioned at a meeting held on 30<sup>th</sup> September 2014, between the Parish Council and representatives from Millbrook Power and Taylor Keogh Communications; the entrance to Kimberley College is very close to the site entrance and will pose a very real accident risk to vulnerable students who are moving from Kimberley College to Wootton Upper School. There has already been a serious accident along this stretch of road involving students and the Police Authority.
3. Level of noise emanating from the engines should be within reasonable levels in all working conditions. This includes times when doors masking the noise are open.
4. Seven pylons were indicated in the PEIR. The Parish Council requests that the minimum number that is reasonable for a development of this size are used.
5. The Parish Council note that this development is not classified as infrastructure and as such are interested and would welcome further discussions with Millbrook Power in regard to a willingness to contribute towards local community projects.

If you require any further clarification or wish to discuss any of the points raised above, please do not hesitate to contact me.

Yours faithfully,

*H. Trustam*

Mrs. H.Trustam  
Parish Clerk

**Rhiannon Parrett**

---

**Subject:** FW: PLANT ENQUIRY RESPONSES - NOT AFFECTED - TATA/KPN

---

**From:** Sandra Lakin [mailto: [REDACTED]]  
**Sent:** 04 November 2014 21:42  
**To:** Paul Wormald  
**Subject:** FW: PLANT ENQUIRY RESPONSES - NOT AFFECTED - TATA/KPN

The locations below are NOT AFFECTED by TATA/KPN apparatus.

PGW/MPL Peter Brett Associates Rookery South Pit Millbrook

**Please note:**  
*McNicholas, on behalf of our client, accept no liability for claims arising from inaccuracies, omissions or errors contained within your plant enquiry request.*

If you require further information please do not hesitate to contact us.

Kind Regards,



**McNicholas Plant Enquiry Team**

Telephone - 0208 236 6592/6614  
Facsimile - 0208 236 6600

Website - [www.mcnicholas.co.uk](http://www.mcnicholas.co.uk)

**Our team. Your solution.**

\*\*\*\*\*

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## Rhiannon Parrett

---

**From:** Danielle Stevens [REDACTED]  
**Sent:** 14 November 2014 21:29  
**To:** millbrookpower.co.uk  
**Cc:** Lyn Lyman; Lyn Lyman  
**Subject:** Comments on non technical summary

**Categories:** Green Category

To whom it may concern

As the chairman of Millbrook Parish Council I am writing regarding the information provided regarding the proposed gas fired power station. On pages 30 and 31 of the non technical summary it states that proposals for access for the gas and electrical connections are being considered through Sandhill Close. I wish to point out that Sandhill Close has both a weight limit of 7.5 tons and a 6'6" width restriction. This is clearly visible on signage at the A507. For this reason I would like to propose that this access point is removed from your options list.

Kind regards

Danielle Stevens

Sent from my iPad



# Ministry of Defence

# Defence Infrastructure Organisation

Sir/Madam  
Peter Brett Associates LLP  
16 Brewhouse Yard  
Clerkenwell  
London  
EC1V 4LJ

Safeguarding Department  
Statutory & Offshore

Defence Infrastructure Organisation  
Kingston Road  
Sutton Coldfield  
West Midlands  
B75 7RL

Tel: [REDACTED] Tel (MOD): [REDACTED]  
Fax: +44 (0)121 311 2218  
E-mail: [DIO-safeguarding-statutory@mod.uk](mailto:DIO-safeguarding-statutory@mod.uk)

[www.mod.uk/DIO](http://www.mod.uk/DIO)

Your Reference: **PGW/M{L**  
Our reference: DIO/SUT/43/8/19 (2014/917)

06 November 2014

Dear Sir/Madam

### MOD Safeguarding – Cardington Airfield

**Proposal:** Millbank Power Ltd, Proposed gas fired power plant

**Location:** Rookery South Pit, Nr Millbrook, Bedfordshire

**Grid Ref:** 501750, 240250

**Planning Ref:** **PGW/M{L**

Thank you for consulting the Ministry of Defence (MOD) on the above proposed development which was received by this office on 08/10/2014. I can confirm that the MOD has no safeguarding objections to this proposal.

I trust this is clear however should you have any questions please do not hesitate to contact me.

Yours sincerely

[REDACTED SIGNATURE]

Di Sylvester

Peter Brett Associates	
London	
Postcode:	
E-mail:	
Phone:	
Fax:	
Print Name:	
10 NOV 2014	
Auth:	
Dist:	
	675

## Land and Development Group

Vicky Stirling  
DCO Liaison Officer  
Network Engineering

Direct tel: [REDACTED]

www.nationalgrid.com

SUBMITTED VIA EMAIL TO: [info@millbrookpower.co.uk](mailto:info@millbrookpower.co.uk)

15 November 2014

Our Ref:

Your Ref: PGW/MPL

Dear Sir/Madam,

### **Millbrook Power Limited: Proposed Gas Fired Power Plant at Rookery South Pit, Nr. Millbrook, Bedfordshire**

#### **Statutory consultation under Section 42 of the Planning Act 2008**

This is a joint response by National Grid Electricity Transmission plc (NGET) and National Grid Gas plc (NGG)

I refer to your letter dated 7<sup>th</sup> October 2014 regarding the above proposed application. Having reviewed the section 42 documents, I would like to make the following comments:

#### **National Grid Infrastructure within or in close proximity to the Proposed Order Limits**

##### **National Grid Electricity Transmission**

National Grid Electricity Transmission has a high voltage electricity transmission overhead line which lies within the proposed order limits. This line forms an essential part of the electricity transmission network in England and Wales and include the following:

- ZA 400kV Overhead Transmission Line – Grendon to Sundon

I enclose plans showing the routes of our overhead lines and the location of our substation within the area shown in the consultation documents.

The following points should be taken into consideration:

- National Grid's Overhead Line/s is protected by a Deed of Easement/Wayleave Agreement which provides full right of access to retain, maintain, repair and inspect our asset
- Statutory electrical safety clearances must be maintained at all times. Any proposed buildings must not be closer than 5.3m to the lowest conductor. National Grid recommends that no permanent structures are built directly beneath overhead lines. These distances are



set out in EN 43 – 8 Technical Specification for “overhead line clearances Issue 3 (2004) available at:

[http://www.nationalgrid.com/uk/LandandDevelopment/DDC/devnearohl\\_final/appendixIII/applIII-part2](http://www.nationalgrid.com/uk/LandandDevelopment/DDC/devnearohl_final/appendixIII/applIII-part2)

- If any changes in ground levels are proposed either beneath or in close proximity to our existing overhead lines then this would serve to reduce the safety clearances for such overhead lines. Safe clearances for existing overhead lines must be maintained in all circumstances.
- Further guidance on development near electricity transmission overhead lines is available here: <http://www.nationalgrid.com/NR/rdonlyres/1E990EE5-D068-4DD6-8C9A-4D0B06A1BA79/31436/Developmentnearoverheadlines1.pdf>
- The relevant guidance in relation to working safely near to existing overhead lines is contained within the Health and Safety Executive’s ([www.hse.gov.uk](http://www.hse.gov.uk)) Guidance Note GS 6 “Avoidance of Danger from Overhead Electric Lines” and all relevant site staff should make sure that they are both aware of and understand this guidance.
- Plant, machinery, equipment, buildings or scaffolding should not encroach within 5.3 metres of any of our high voltage conductors when those conductors are under their worse conditions of maximum “sag” and “swing” and overhead line profile (maximum “sag” and “swing”) drawings should be obtained using the contact details above.
- If a landscaping scheme is proposed as part of the proposal, we request that only slow and low growing species of trees and shrubs are planted beneath and adjacent to the existing overhead line to reduce the risk of growth to a height which compromises statutory safety clearances.
- Drilling or excavation works should not be undertaken if they have the potential to disturb or adversely affect the foundations or “pillars of support” of any existing tower. These foundations always extend beyond the base area of the existing tower and foundation (“pillar of support”) drawings can be obtained using the contact details above

## **National Grid Gas Transmission**

National Grid has three high pressure gas transmission pipelines located within the proposed order limits. The high pressure gas pipelines located within this area are:

- FM09- Huntingdon- Steppingley
- FM26- Huntingdon- Steppingley
- FM07- Old Warden- Chalgrove

## **Specific Comments – Gas Infrastructure**

The following points should be taken into consideration:

- National Grid has a Deed of Grant of Easement for each pipeline, which prevents the erection of permanent / temporary buildings, or structures, change to existing ground levels, storage of materials etc.

## Pipeline Crossings:

- Where existing roads cannot be used, construction traffic should ONLY cross the pipeline at previously agreed locations.
- The pipeline shall be protected, at the crossing points, by temporary rafts constructed at ground level. The third party shall review ground conditions, vehicle types and crossing frequencies to determine the type and construction of the raft required.
- The type of raft shall be agreed with National Grid prior to installation.
- No protective measures including the installation of concrete slab protection shall be installed over or near to the National Grid pipeline without the prior permission of National Grid.
- National Grid will need to agree the material, the dimensions and method of installation of the proposed protective measure.
- The method of installation shall be confirmed through the submission of a formal written method statement from the contractor to National Grid.
- Please be aware that written permission is required before any works commence within the National Grid easement strip.
- A National Grid representative shall monitor any works within close proximity to the pipeline to comply with National Grid specification T/SP/SSW22.
- A Deed of Consent is required for any crossing of the easement

## Cables Crossing:

- Cables may cross the pipeline at perpendicular angle to the pipeline i.e. 90 degrees.
- A National Grid representative shall supervise any cable crossing of a pipeline.
- Clearance must be at least 600mm above or below the pipeline.
- Impact protection slab should be laid between the cable and pipeline if cable crossing is above the pipeline.
- A Deed of Consent is required for any cable crossing the easement.
- Where a new service is to cross over the pipeline a clearance distance of 0.6 metres between the crown of the pipeline and underside of the service should be maintained. If

this cannot be achieved the service shall cross below the pipeline with a clearance distance of 0.6 metres.

#### General Notes on Pipeline Safety:

- You should be aware of the Health and Safety Executives guidance document HS(G) 47 "Avoiding Danger from Underground Services", and National Grid's specification for Safe Working in the Vicinity of National Grid High Pressure gas pipelines and associated installations - requirements for third parties T/SP/SSW22.
- National Grid will also need to ensure that our pipelines access is maintained during and after construction.
- Our pipelines are normally buried to a depth cover of 1.1 metres however; actual depth and position must be confirmed on site by trial hole investigation under the supervision of a National Grid representative. Ground cover above our pipelines should not be reduced or increased.
- If any excavations are planned within 3 metres of National Grid High Pressure Pipeline or, within 10 metres of an AGI (Above Ground Installation), or if any embankment or dredging works are proposed then the actual position and depth of the pipeline must be established on site in the presence of a National Grid representative. A safe working method agreed prior to any work taking place in order to minimise the risk of damage and ensure the final depth of cover does not affect the integrity of the pipeline.
- Excavation works may take place unsupervised no closer than 3 metres from the pipeline once the actual depth and position has been confirmed on site under the supervision of a National Grid representative. Similarly, excavation with hand held power tools is not permitted within 1.5 metres from our apparatus and the work is undertaken with NG supervision and guidance.

To view the SSW22 Document, please use the link below:

<http://www2.nationalgrid.com/uk/Safety/library/>

To download a copy of the HSE Guidance HS(G)47, please use the following link:

<http://www.hse.gov.uk/pubns/books/hsg47.htm>

Further information in relation to National Grid's gas transmission pipelines can be accessed via the following internet link:

<http://www.nationalgrid.com/uk/LandandDevelopment/DDC/gastransmission/gaspipes/>

#### **Further Advice**

**We would request that the potential impact of the proposed scheme on National Grid's existing assets as set out above is considered in any subsequent reports, including in the Environmental Statement, and as part of any subsequent application.**

**Where it is intended to acquire land, extinguish rights, or interfere with any of National Grid apparatus protective provisions will be required in a form acceptable to it to be included within the DCO.**

**The information in this letter is provided notwithstanding any discussions taking place in relation to connections with electricity or gas customer transmission network services.**

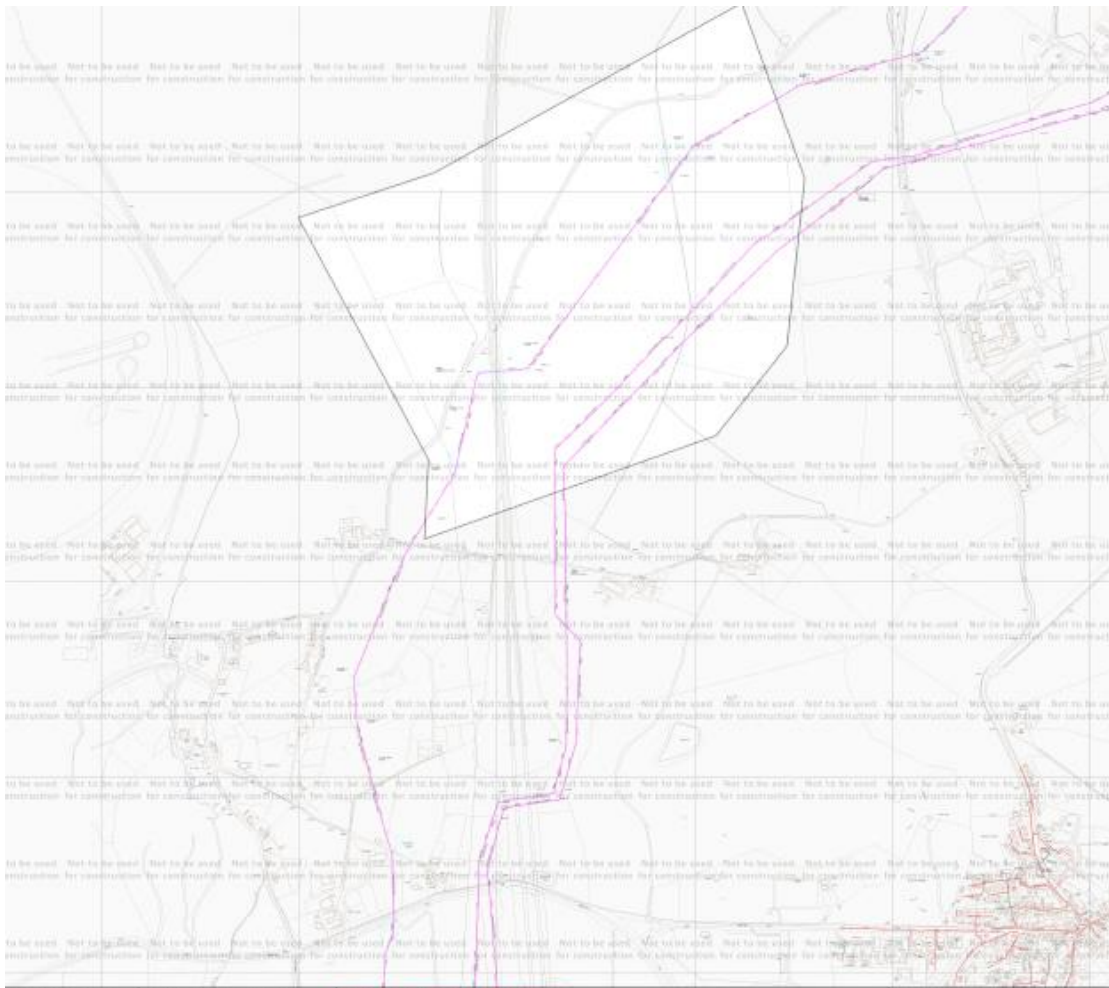
I hope the above information is useful. If you require any further information please do not hesitate to contact me.

Yours sincerely



**Vicky Stirling**


(Submitted Electronically)



IA_TE_Z3_3FWP_018789	View extent: 2890m, 3670m	<b>National Grid objects to this application</b>	Map 1 of 2 (GAS)	
ER: rebecca.flint	UP MAINS	<p>This plan shows those pipes owned by National Grid Gas plc in its role as a Licensed Gas Transporter (GTT). Gas pipes owned by other GTTs, or otherwise privately owned, may be present in this area. Information with regard to such pipes should be obtained from the relevant owners. The information shown on this plan is given without warranty, the accuracy thereof cannot be guaranteed. Service pipes, valves, siphons, stub connections, etc. are not shown but their presence should be anticipated. No liability of any kind whatsoever is accepted by National Grid Gas plc or their agents, servants or contractors for any error or omission. Safe digging practices, in accordance with HSE/G47, must be used to verify and establish the actual position of mains, pipes, services and other apparatus on site before any mechanical plant is used. It is your responsibility to ensure that this information is provided to all persons (either direct labour or contractors) working for you on or near gas premises. The information included on this plan should not be referred to beyond a period of 28 days from the date</p>	MAPS Plot Server Version 1.8.0	
FE: 27/06/2014	IP MAINS			
FA DATE: 26/06/2014	SHP MAINS			
Milnes Power Project (RF)	NHP MAINS			
* REF: TL0239	Scale: 1:300m		Requested by: National Grid This plan is reproduced from or based on the	
ITRE: 502138, 239797	Approximate scale 1:10000 on A3 Colour Printout			





TR_24_2FW*_018789	View extent: 2800m, 3670m	<b>National Grid objects to this application</b>	<b>Map 2 of 2 (ELECTRIC)</b>
I: rebecca flint	Underground cables	This plan shows those cables owned by National Grid Electricity Transmission plc in its role as a Licensed Electricity	MAPS Plot Server Version 1.8.0
: 27/06/2014	Overhead lines	Transporter (ET). Electricity cables owned by other ETs, or otherwise privately owned, may be present in this area.	<b>nationalgrid</b>
DATE: 22/11/2013	 Approximate scale 1:10000 on A3 Colour Printout	Information with regard to such cables should be obtained from the relevant owners. The information shown on this plan	Requested by National Grid
Ibexak Power Project (RF)		is given without warranty, the accuracy thereof cannot be guaranteed. Ancillary equipment such as cooling systems and	This plan is reproduced from or based on the CG
EP: TLD239		communication cables are not shown but their presence should be anticipated. No liability of any kind whatsoever is	map by National Grid Electricity Transmission
RE: 502138, 239797		accepted by National Grid Electricity Transmission plc or their agents, servants or contractors for any error or omission.	plc, with the sanction of the controller of HM
		Safe digging practices, in accordance with HSG147, must be used to verify and establish the actual position of cables	
		and other apparatus on site before any mechanical plant is used. It is your responsibility to ensure that this information	
		is provided to all persons (either direct labour or contractors) working for you on or near electricity apparatus. The	
		information included on this plan should not be relied to beyond a period of 28 days from the date of issue.	

**From:** [ROSSI, Sacha](#)  
**To:** [millbrookpower.co.uk](mailto:millbrookpower.co.uk)  
**Cc:** [NATS Safeguarding](#)  
**Subject:** MILBROOK POWER PROJECT PEIR NTS  
**Date:** 14 October 2014 11:46:10

---

Dear Sirs,

I refer to the development referenced above and to the PEIR documentation received by surface mail. NATS does not anticipate any impact from the proposed development and as such has no comments to make.

Regards  
S. Rossi  
NATS Safeguarding Office

**Mr Sacha Rossi**  
ATC Systems Safeguarding Engineer

: [REDACTED]  
: [REDACTED]

NATS Safeguarding  
4000 Parkway,  
Whiteley, PO15 7FL

<http://www.nats.co.uk/windfarms>

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Date: 29 October 2014  
Our ref: 133972  
Your ref: PGW/MPL



Paul Wormald  
Peter Brett Associates  
**BY EMAIL ONLY**

Customer Services  
Hornbeam House  
Crewe Business Park  
Electra Way  
Crewe  
Cheshire  
CW1 6GJ

T 0300 060 3900

Dear Paul

**Planning consultation:** Section 42 consultation for proposed gas fired power plant  
**Location:** Rookery South Pit, nr Millbrook, Bedfordshire

Thank you for your consultation on the above dated 07 October 2014.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

### **Designated Sites**

The main potential for impacts to Sites of Special Scientific Interest (SSSIs) would be through the operation of the development which may cause changes in air quality. Natural England is satisfied that there would not be any adverse effects to SSSIs through the construction or decommissioning stages. We note Table 6.10 states that air quality impacts including from nitrogen deposition and acid deposition are unlikely to be significant for ecological receptors. However the PEIR does not provide values for the process contributions at specific ecological receptors and Natural England will need to see the modelled process contributions for nearby SSSIs to be confident that there will be no adverse impacts as a result of the project.

### **Protected Species**

We note the presence of protected species including great crested newts and bats within the project area. Should the development involve a requirement for any protected species licences to be issued by Natural England it is important that the details are agreed with us at an early stage. This is so that Natural England can advise PINS that the presence of protected species does not represent a risk to the delivery of the proposed development. Please use the following link for detailed advice on how to engage with Natural England on protected species licensing of NSIPs:

[http://webarchive.nationalarchives.gov.uk/20140605090108/http://www.naturalengland.org.uk/Image/s/WML-G36\\_tcm6-28566.pdf](http://webarchive.nationalarchives.gov.uk/20140605090108/http://www.naturalengland.org.uk/Image/s/WML-G36_tcm6-28566.pdf)

We note that table 8.3, which assesses the ecological impacts of operation of the power plant does not include impacts of lighting. Lighting may potentially have a significant impact on receptors such as bat populations and should be considered as part of the EIA.

### **Soils and Agricultural Land**

Table 10.8 identifies loss of agricultural land as an impact of the gas connection works. This may be through a combination of permanent loss and damage to soil through excavation and replacement of soils for the pipeline. To assess the significance of this impact Natural England would recommend





that the area of agricultural land to be affected by the works is quantified. Depending on the area of land affected it may be necessary to undertake an agricultural land quality and soil resources survey. This would identify whether best and most versatile land is affected and inform the methodology for soil handling during the works.

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.

For any queries relating to the specific advice in this letter only please contact Ross Holdgate on [REDACTED]. For any new consultations, or to provide further information on this consultation please send your correspondences to [consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk).

Yours sincerely

Ross Holdgate  
Essex, Herts, Beds, Cambs and Northants Area Team



Public Health  
England

CRCE/NSIP Consultations  
Chilton  
Didcot  
Oxfordshire OX11 0RQ

T [REDACTED]  
F [REDACTED]  
[www.gov.uk/phe](http://www.gov.uk/phe)

Paul Wormald  
Freepost [RTEY-JYYB-ERSR]  
Millbrook Power Ltd  
49 York Place  
Edinburgh  
EH1 3JD

Your Ref: PGW/MPL  
Our Ref: ENFFGS 141003 354

14<sup>th</sup> November 2014

Dear Mr Wormald,

**Re: Nationally Significant Infrastructure Project  
Millbrook Power Station, Rookery South Pit, Millbrook, Bedfordshire**

Thank you for your consultation regarding the above development on 30 September 2014. Public Health England (PHE) welcomes the opportunity to comment on your proposals and preliminary environmental information report at this stage of the project.

Our records indicate that we have replied to earlier consultations as listed below and this response should be read in conjunction with that earlier correspondence.

- Request for Scoping Opinion 17<sup>th</sup> July 2014

PHE has assessed the submitted documentation with reference to the recommendations provided in our scoping response and wishes to make the following comments.

1. PHE is generally satisfied with the proposed methodology. PHE would expect to see that the detailed quantitative and cumulative assessments proposed are undertaken and provided.
2. PHE will provide further comments on air quality once the results of the cumulative assessment and modelling are available.
3. PHE notes that the details of the connection to the national grid have not yet been finalised and that there is currently no assessment of the potential impacts of electromagnetic fields (EMF). PHE will require the promoter to demonstrate that risks from EMF's have been fully considered and that an assessment of the possible health effects is included in the final submission. For further guidance relating to this, you are referred to our earlier scoping response, a copy of which with updated weblinks is included below.

4. PHE understands that the promoter will wish to avoid unnecessary duplication and that many issues including air quality, emissions to water, waste, contaminated land etc. will be covered elsewhere in the ES. PHE however recommends that the final report should include a section which summarises the relevant issues. This provides a focus which ensures that public health is given adequate consideration. The section should summarise key information, risk assessments, proposed mitigation measures, conclusions and residual impacts, relating to human health. Compliance with the requirements of National Policy Statements and relevant guidance and standards should also be highlighted.

We hope that the above is useful but should you have any questions or concerns please do not hesitate to contact us.

Yours sincerely



Adrienne Dunne  
Specialist Environmental Public Health Scientist

E [nsipconsultations@phe.gov.uk](mailto:nsipconsultations@phe.gov.uk)

*Please mark any correspondence for the attention of National Infrastructure Planning Administration*

## **Appendix: PHE recommendations regarding the scoping document**

### **General approach**

The EIA should give consideration to best practice guidance such as the Government's Good Practice Guide for EIA<sup>1</sup>. It is important that the EIA identifies and assesses the potential public health impacts of the activities at, and emissions from, the installation. Assessment should consider the development, operational, and decommissioning phases.

It is not PHE's role to undertake these assessments on behalf of promoters as this would conflict with PHE's role as an impartial and independent body.

We note that the information provided states that there will be three associated development projects, but that these will be the subject of separate planning consent applications. We recommend that the EIA includes consideration of the impacts of associated development and that cumulative impacts are fully accounted for.

Consideration of alternatives (including alternative sites, choice of process, and the phasing of construction) is widely regarded as good practice. Ideally, EIA should start at the stage of site and process selection, so that the environmental merits of practicable alternatives can be properly considered. Where this is undertaken, the main alternatives considered should be outlined in the ES<sup>2</sup>.

The following text covers a range of issues that PHE would expect to be addressed by the promoter. However this list is not exhaustive and the onus is on the promoter to ensure that the relevant public health issues are identified and addressed. PHE's advice and recommendations carry no statutory weight and constitute non-binding guidance.

### **Receptors**

The ES should clearly identify the development's location and the location and distance from the development of off-site human receptors that may be affected by emissions from, or activities at, the development. Off-site human receptors may include people living in residential premises; people working in commercial, and industrial premises and people using transport infrastructure (such as roads and railways), recreational areas, and publicly-accessible land. Consideration should also be given to environmental receptors such as the surrounding land, watercourses, surface and groundwater, and drinking water supplies such as wells, boreholes and water abstraction points.

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<sup>1</sup> Environmental Impact Assessment: A guide to good practice and procedures - A consultation paper; 2006; Department for Communities and Local Government. Available from:

<http://www.communities.gov.uk/archived/publications/planningandbuilding/environmentalimpactassessment>

<sup>2</sup> DCLG guidance, 1999 <http://www.communities.gov.uk/documents/planningandbuilding/pdf/155958.pdf>

## **Impacts arising from construction and decommissioning**

Any assessment of impacts arising from emissions due to construction and decommissioning should consider potential impacts on all receptors and describe monitoring and mitigation during these phases. Construction and decommissioning will be associated with vehicle movements and cumulative impacts should be accounted for.

We would expect the promoter to follow best practice guidance during all phases from construction to decommissioning to ensure appropriate measures are in place to mitigate any potential impact on health from emissions (point source, fugitive and traffic-related). An effective Construction Environmental Management Plan (CEMP) (and Decommissioning Environmental Management Plan (DEMP)) will help provide reassurance that activities are well managed. The promoter should ensure that there are robust mechanisms in place to respond to any complaints of traffic-related pollution, during construction, operation, and decommissioning of the facility.

## **Emissions to air and water**

Significant impacts are unlikely to arise from installations which employ Best Available Techniques (BAT) and which meet regulatory requirements concerning emission limits and design parameters. However, PHE has a number of comments regarding emissions in order that the EIA provides a comprehensive assessment of potential impacts.

When considering a baseline (of existing environmental quality) and in the assessment and future monitoring of impacts these:

- should include appropriate screening assessments and detailed dispersion modelling where this is screened as necessary
- should encompass all pollutants which may be emitted by the installation in combination with all pollutants arising from associated development and transport, ideally these should be considered in a single holistic assessment
- should consider the construction, operational, and decommissioning phases
- should consider the typical operational emissions and emissions from start-up, shut-down, abnormal operation and accidents when assessing potential impacts and include an assessment of worst-case impacts

- should fully account for fugitive emissions
- should include appropriate estimates of background levels
- should identify cumulative and incremental impacts (i.e. assess cumulative impacts from multiple sources), including those arising from associated development, other existing and proposed development in the local area, and new vehicle movements associated with the proposed development; associated transport emissions should include consideration of non-road impacts (i.e. rail, sea, and air)
- should include consideration of local authority, Environment Agency, Defra national network, and any other local site-specific sources of monitoring data
- should compare predicted environmental concentrations to the applicable standard or guideline value for the affected medium (such as UK Air Quality Standards and Objectives and Environmental Assessment Levels)
  - If no standard or guideline value exists, the predicted exposure to humans should be estimated and compared to an appropriate health-based value (a Tolerable Daily Intake or equivalent). Further guidance is provided in Annex 1
  - This should consider all applicable routes of exposure e.g. include consideration of aspects such as the deposition of chemicals emitted to air and their uptake via ingestion
- should identify and consider impacts on residential areas and sensitive receptors (such as schools, nursing homes and healthcare facilities) in the area(s) which may be affected by emissions, this should include consideration of any new receptors arising from future development

Whilst screening of impacts using qualitative methodologies is common practice (e.g. for impacts arising from fugitive emissions such as dust), where it is possible to undertake a quantitative assessment of impacts then this should be undertaken.

PHE's view is that the EIA should appraise and describe the measures that will be used to control both point source and fugitive emissions and demonstrate that standards, guideline values or health-based values will not be exceeded due to emissions from the installation, as described above. This should include consideration of any emitted pollutants for which there are no set emission limits. When assessing the potential impact of a proposed installation on environmental quality, predicted environmental concentrations should be compared to the permitted concentrations in the affected media; this should include both standards for short and long-term exposure.

*Additional points specific to emissions to air*

When considering a baseline (of existing air quality) and in the assessment and future monitoring of impacts these:

- should include consideration of impacts on existing areas of poor air quality e.g. existing or proposed local authority Air Quality Management Areas (AQMAs)
- should include modelling using appropriate meteorological data (i.e. come from the nearest suitable meteorological station and include a range of years and worst case conditions)
- should include modelling taking into account local topography

*Additional points specific to emissions to water*

When considering a baseline (of existing water quality) and in the assessment and future monitoring of impacts these:

- should include assessment of potential impacts on human health and not focus solely on ecological impacts
- should identify and consider all routes by which emissions may lead to population exposure (e.g. surface watercourses; recreational waters; sewers; geological routes etc.)
- should assess the potential off-site effects of emissions to groundwater (e.g. on aquifers used for drinking water) and surface water (used for drinking water abstraction) in terms of the potential for population exposure
- should include consideration of potential impacts on recreational users (e.g. from fishing, canoeing etc) alongside assessment of potential exposure via drinking water

## **Land quality**

We would expect the promoter to provide details of any hazardous contamination present on site (including ground gas) as part of the site condition report.

Emissions to and from the ground should be considered in terms of the previous history of the site and the potential of the site, once operational, to give rise to issues. Public health impacts associated with ground contamination and/or the migration of material off-site should be assessed<sup>3</sup> and the potential impact on nearby receptors and control and mitigation measures should be outlined.

Relevant areas outlined in the Government's Good Practice Guide for EIA include:

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<sup>3</sup> Following the approach outlined in the section above dealing with emissions to air and water i.e. comparing predicted environmental concentrations to the applicable standard or guideline value for the affected medium (such as Soil Guideline Values)

- effects associated with ground contamination that may already exist
- effects associated with the potential for polluting substances that are used (during construction / operation) to cause new ground contamination issues on a site, for example introducing / changing the source of contamination
- impacts associated with re-use of soils and waste soils, for example, re-use of site-sourced materials on-site or offsite, disposal of site-sourced materials offsite, importation of materials to the site, etc.

## **Waste**

The EIA should demonstrate compliance with the waste hierarchy (e.g. with respect to re-use, recycling or recovery and disposal).

For wastes arising from the installation the EIA should consider:

- the implications and wider environmental and public health impacts of different waste disposal options
- disposal route(s) and transport method(s) and how potential impacts on public health will be mitigated

## **Other aspects**

Within the EIA PHE would expect to see information about how the promoter would respond to accidents with potential off-site emissions e.g. flooding or fires, spills, leaks or releases off-site. Assessment of accidents should: identify all potential hazards in relation to construction, operation and decommissioning; include an assessment of the risks posed; and identify risk management measures and contingency actions that will be employed in the event of an accident in order to mitigate off-site effects.

The EIA should include consideration of the COMAH Regulations (Control of Major Accident Hazards) and the Major Accident Off-Site Emergency Plan (Management of Waste from Extractive Industries) (England and Wales) Regulations 2009: both in terms of their applicability to the installation itself, and the installation's potential to impact on, or be impacted by, any nearby installations themselves subject to the these Regulations.

There is evidence that, in some cases, perception of risk may have a greater impact on health than the hazard itself. A 2009 report<sup>4</sup>, jointly published by Liverpool John Moores University and the HPA, examined health risk perception and environmental problems using a number of case studies. As a point to consider, the report suggested: "Estimation of community anxiety and stress should be included as part of every risk or impact assessment of proposed plans that involve a potential

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<sup>4</sup> Available from: <http://www.cph.org.uk/showPublication.aspx?pubid=538>



environmental hazard. This is true even when the physical health risks may be negligible.” PHE supports the inclusion of this information within EIAs as good practice.

### **Electromagnetic fields (EMF) [include for installations with associated substations and/or power lines]**

There is a potential health impact associated with the electric and magnetic fields around substations and the connecting cables or lines. The following information provides a framework for considering the potential health impact.

In March 2004, the National Radiological Protection Board, NRPB (now part of PHE), published advice on limiting public exposure to electromagnetic fields. The advice was based on an extensive review of the science and a public consultation on its website, and recommended the adoption in the UK of the EMF exposure guidelines published by the International Commission on Non-ionizing Radiation Protection (ICNIRP):-

<http://webarchive.nationalarchives.gov.uk/20140629102627/http://www.hpa.org.uk/Publications/Radiation/NPRBArchive/DocumentsOfTheNRPB/Absd1502/>

The ICNIRP guidelines are based on the avoidance of known adverse effects of exposure to electromagnetic fields (EMF) at frequencies up to 300 GHz (gigahertz), which includes static magnetic fields and 50 Hz electric and magnetic fields associated with electricity transmission.

PHE notes the current Government policy is that the ICNIRP guidelines are implemented in line with the terms of the EU Council Recommendation on limiting exposure of the general public (1999/519/EC):

[http://webarchive.nationalarchives.gov.uk/+www.dh.gov.uk/en/PublicHealth/HealthProtection/DH\\_4089500](http://webarchive.nationalarchives.gov.uk/+www.dh.gov.uk/en/PublicHealth/HealthProtection/DH_4089500)

For static magnetic fields, the latest ICNIRP guidelines (2009) recommend that acute exposure of the general public should not exceed 400 mT (millitesla), for any part of the body, although the previously recommended value of 40 mT is the value used in the Council Recommendation. However, because of potential indirect adverse effects, ICNIRP recognises that practical policies need to be implemented to prevent inadvertent harmful exposure of people with implanted electronic medical devices and implants containing ferromagnetic materials, and injuries due to flying ferromagnetic objects, and these considerations can lead to much lower restrictions, such as 0.5 mT as advised by the International Electrotechnical Commission.

At 50 Hz, the known direct effects include those of induced currents in the body on the central nervous system (CNS) and indirect effects include the risk of painful spark discharge on contact with metal objects exposed to the field. The ICNIRP guidelines give reference levels for public exposure to 50 Hz electric and magnetic fields, and these are respectively 5 kV m<sup>-1</sup> (kilovolts per metre) and 100 µT (microtesla). If people are not exposed to field strengths above these levels, direct

effects on the CNS should be avoided and indirect effects such as the risk of painful spark discharge will be small. The reference levels are not in themselves limits but provide guidance for assessing compliance with the basic restrictions and reducing the risk of indirect effects. Further clarification on advice on exposure guidelines for 50 Hz electric and magnetic fields is provided in the following note on the HPA website:

[http://webarchive.nationalarchives.gov.uk/20140714084352/http://www.hpa.org.uk/Topics/Radiation/UnderstandingRadiation/InformationSheets/info\\_IcnirpExpGuidelines/](http://webarchive.nationalarchives.gov.uk/20140714084352/http://www.hpa.org.uk/Topics/Radiation/UnderstandingRadiation/InformationSheets/info_IcnirpExpGuidelines/)

The Department of Energy and Climate Change has also published voluntary code of practices which set out key principles for complying with the ICNIRP guidelines for the industry.

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/37447/1256-code-practice-emf-public-exp-guidelines.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/37447/1256-code-practice-emf-public-exp-guidelines.pdf)

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/48309/1255-code-practice-optimum-phasing-power-lines.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/48309/1255-code-practice-optimum-phasing-power-lines.pdf)

There is concern about the possible effects of long-term exposure to electromagnetic fields, including possible carcinogenic effects at levels much lower than those given in the ICNIRP guidelines. In the NRPB advice issued in 2004, it was concluded that the studies that suggest health effects, including those concerning childhood leukaemia, could not be used to derive quantitative guidance on restricting exposure. However, the results of these studies represented uncertainty in the underlying evidence base, and taken together with people's concerns, provided a basis for providing an additional recommendation for Government to consider the need for further precautionary measures, particularly with respect to the exposure of children to power frequency magnetic fields.

The Stakeholder Advisory Group on ELF EMFs (SAGE) was then set up to take this recommendation forward, explore the implications for a precautionary approach to extremely low frequency electric and magnetic fields (ELF EMFs), and to make practical recommendations to Government. In the First Interim Assessment of the Group, consideration was given to mitigation options such as the 'corridor option' near power lines, and optimal phasing to reduce electric and magnetic fields. A Second Interim Assessment addresses electricity distribution systems up to 66 kV. The SAGE reports can be found at the following link:

<http://sagedialogue.org.uk/> (go to "Document Index" and Scroll to SAGE/Formal reports with recommendations)

The Agency has given advice to Health Ministers on the First Interim Assessment of SAGE regarding precautionary approaches to ELF EMFs and specifically regarding power lines and property, wiring and electrical equipment in homes:

[http://webarchive.nationalarchives.gov.uk/20140629102627/http://www.hpa.org.uk/Publications/Radiation/HPAResponseStatementsOnRadiationTopics/rpdadvice\\_sage/](http://webarchive.nationalarchives.gov.uk/20140629102627/http://www.hpa.org.uk/Publications/Radiation/HPAResponseStatementsOnRadiationTopics/rpdadvice_sage/)

The evidence to date suggests that in general there are no adverse effects on the health of the population of the UK caused by exposure to ELF EMFs below the guideline levels. The scientific evidence, as reviewed by PHE, supports the view that precautionary measures should address solely the possible association with childhood leukaemia and not other more speculative health effects. The measures should be proportionate in that overall benefits outweigh the fiscal and social costs, have a convincing evidence base to show that they will be successful in reducing exposure, and be effective in providing reassurance to the public.

The Government response to the First SAGE Interim Assessment is given in the written Ministerial Statement by Gillian Merron, then Minister of State, Department of Health, published on 16<sup>th</sup> October 2009:

<http://www.publications.parliament.uk/pa/cm200809/cmhansrd/cm091016/wmstext/91016m0001.htm>

[http://webarchive.nationalarchives.gov.uk/20130107105354/http://www.dh.gov.uk/en/Publicationsandstatistics/Publications/PublicationsPolicyAndGuidance/DH\\_107124](http://webarchive.nationalarchives.gov.uk/20130107105354/http://www.dh.gov.uk/en/Publicationsandstatistics/Publications/PublicationsPolicyAndGuidance/DH_107124)

HPA and Government responses to the Second Interim Assessment of SAGE are available at the following links:

[http://webarchive.nationalarchives.gov.uk/20140629102627/http://www.hpa.org.uk/Publications/Radiation/HPAResponseStatementsOnRadiationTopics/rpdadvice\\_sage2/](http://webarchive.nationalarchives.gov.uk/20140629102627/http://www.hpa.org.uk/Publications/Radiation/HPAResponseStatementsOnRadiationTopics/rpdadvice_sage2/)

[http://www.dh.gov.uk/en/Publicationsandstatistics/Publications/PublicationsPolicyAndGuidance/DH\\_130703](http://www.dh.gov.uk/en/Publicationsandstatistics/Publications/PublicationsPolicyAndGuidance/DH_130703)

The above information provides a framework for considering the health impact associated with the proposed development, including the direct and indirect effects of the electric and magnetic fields as indicated above.

**Liaison with other stakeholders, comments should be sought from:**

- the local authority for matters relating to noise, odour, vermin and dust nuisance
- the local authority regarding any site investigation and subsequent construction (and remediation) proposals to ensure that the site could not be determined as 'contaminated land' under Part 2A of the Environmental Protection Act
- the local authority regarding any impacts on existing or proposed Air Quality Management Areas

- the Food Standards Agency for matters relating to the impact on human health of pollutants deposited on land used for growing food/ crops
- the Environment Agency for matters relating to flood risk and releases with the potential to impact on surface and groundwaters
- the Environment Agency for matters relating to waste characterisation and acceptance
- the Clinical Commissioning Groups, NHS commissioning Boards and Local Planning Authority for matters relating to wider public health

### **Environmental Permitting**

Amongst other permits and consents, the development will require an environmental permit from the Environment Agency to operate (under the Environmental Permitting (England and Wales) Regulations 2010). Therefore the installation will need to comply with the requirements of best available techniques (BAT). PHE is a consultee for bespoke environmental permit applications and will respond separately to any such consultation.

## Annex 1

### Human health risk assessment (chemical pollutants)

The points below are cross-cutting and should be considered when undertaking a human health risk assessment:

- The promoter should consider including Chemical Abstract Service (CAS) numbers alongside chemical names, where referenced in the ES
- Where available, the most recent United Kingdom standards for the appropriate media (e.g. air, water, and/or soil) and health-based guideline values should be used when quantifying the risk to human health from chemical pollutants. Where UK standards or guideline values are not available, those recommended by the European Union or World Health Organisation can be used
- When assessing the human health risk of a chemical emitted from a facility or operation, the background exposure to the chemical from other sources should be taken into account
- When quantitatively assessing the health risk of genotoxic and carcinogenic chemical pollutants PHE does not favour the use of mathematical models to extrapolate from high dose levels used in animal carcinogenicity studies to well below the observed region of a dose-response relationship. When only animal data are available, we recommend that the 'Margin of Exposure' (MOE) approach<sup>5</sup> is used

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<sup>5</sup> Benford D et al. 2010. Application of the margin of exposure approach to substances in food that are genotoxic and carcinogenic. Food Chem Toxicol 48 Suppl 1: S2-24

**Rhiannon Parrett**

---

**Subject:** FW: PGW/MPL

**From:** [REDACTED] [mailto:[REDACTED]]

**Sent:** 08 October 2014 13:55

**To:** Paul Wormald

**Subject:** PGW/MPL

Dear Sirs

With reference to the above I can confirm that Quadrant Pipelines Limited and all Companies associated with them have no comment to make at this moment in time.

Kind Regards

Maggie

Maggie Ketteridge  
*Engineering Support Officer*  
GTC  
Energy House  
Woolpit Business Park  
Woolpit  
Bury St Edmunds  
Suffolk, IP30 9UP  
Tel: [REDACTED]  
Fax: [REDACTED]  
E-mail: [REDACTED]  
Web: [www.gtc-uk.co.uk](http://www.gtc-uk.co.uk)

NOTE:

This E-Mail originates from GTC, Energy House, Woolpit Business Park, Woolpit, Bury St Edmunds, Suffolk, IP30 9UP  
VAT Number: GB688 8971 40. Registered No: 029431.

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**The Coal  
Authority**



INVESTOR IN PEOPLE

**200 Lichfield Lane  
Berry Hill  
Mansfield  
Nottinghamshire  
NG18 4RG**

**Tel: 01623 637 119 (Planning Enquiries)**

**Email: [planningconsultation@coal.gov.uk](mailto:planningconsultation@coal.gov.uk)**

**Web: [www.gov.uk/government/organisations/the-coal-authority](http://www.gov.uk/government/organisations/the-coal-authority)**

Mr Paul Wormald – Director of Planning for Waste and Energy  
Peter Brett Associates LLP  
For and on behalf of Millbrook Power Limited

**[By Email: [info@millbrookpower.co.uk](mailto:info@millbrookpower.co.uk)]**

6 November 2014

Dear Mr Wormald

**Millbrook Power Limited: Proposed gas fired power plant at Rookery South Pit, Nr. Millbrook, Bedfordshire**

### **Consultation under Section 42 of the Planning Act 2008**

Thank you for your consultation letter of 7 October 2014 seeking the pre-application views of The Coal Authority on the above proposal.

The Coal Authority is a non-departmental public body sponsored by the Department of Energy and Climate Change. As a statutory consultee, The Coal Authority has a duty to respond to planning applications and development plans in order to protect the public and the environment in mining areas.

#### The Coal Authority Response:

I have reviewed the Preliminary Environmental Information Report and can confirm that the proposed Nationally Significant Infrastructure Project would be located outside of the defined coalfield. Accordingly, I can confirm that The Coal Authority has **no comments** or observations to make on this proposal.

Yours sincerely

*Mark Harrison*

**Mark E. N. Harrison** *B.A.(Hons), DipTP, LL.M, MInstLM, MRTPI*  
**Planning Liaison Manager**



## Disclaimer

The above consultation response is provided by The Coal Authority as a Statutory Consultee and is based upon the latest available coal mining data on the date of the response, and electronic consultation records held by The Coal Authority since 1 April 2013. The comments made are also based upon only the information provided to The Coal Authority by the Local Planning Authority and/or has been published on the Council's website for consultation purposes in relation to this specific planning application. The views and conclusions contained in this response may be subject to review and amendment by The Coal Authority if additional or new data/information (such as a revised Coal Mining Risk Assessment) is provided by the Local Planning Authority or the Applicant for consultation purposes.

**Rhiannon Parrett**

---

**Subject:** FW: PGW/MPL

**From:** [REDACTED] [mailto:[REDACTED]]

**Sent:** 20 February 2015 09:16

**To:** Paul Wormald

**Subject:** PGW/MPL

Dear Sirs

With reference to the above I can confirm that the following have no comment to make at this moment in time.

Independent Pipelines Limited  
GTC Pipelines Limited  
Independent Power Networks Limited  
The Electricity Network Company Limited

Kind Regards

Maggie

Maggie Ketteridge  
*Engineering Support Officer*  
GTC  
Energy House  
Woolpit Business Park  
Woolpit  
Bury St Edmunds  
Suffolk, IP30 9UP  
Tel: [REDACTED]  
Fax: [REDACTED]  
E-mail: [REDACTED]  
Web: [www.gtc-uk.co.uk](http://www.gtc-uk.co.uk)

NOTE:

This E-Mail originates from GTC, Energy House, Woolpit Business Park, Woolpit, Bury St Edmunds, Suffolk, IP30 9UP

VAT Number: GB688 8971 40. Registered No: 029431.

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## Appendix 4.B: Section 42 responses as received

### 4.B(ii) Section 42(1)(b) responses

1. Bedford Borough Council
2. Central Bedfordshire Council
3. North Hertfordshire Council
4. Borough Council of Wellingborough



## TOWN AND COUNTRY PLANNING ACT 1990

### TOWN AND COUNTRY PLANNING GENERAL DEVELOPMENT PROCEDURE ORDER

#### BBC APPLICATION NO: 14/02534/LPA

To: Millbrook Power Ltd  
Peter Brett Associates LLP  
16 Brewhouse Yard  
Clerkenwell  
London  
EC1V 4LJ

**Bedford Borough Council** ***OBJECTS TO and COMMENTS*** on the development as set out on your Website. Our comments are set out below.

**APPLICANT :** Millbrook Power Ltd

**LOCATION :** Land At Former Rookery Brick Pit Location R4 Green Lane Stewartby  
Bedfordshire

#### **PARTICULARS OF DEVELOPMENT :**

Proposed Gas Fire power plant: (Consultation on proposed application to be submitted to Planning Inspectorate / Secretary of State for determination)

To view the plans: [www.millbrookpower.co.uk](http://www.millbrookpower.co.uk) To respond to the application by: Email: [info@millbrookpower.co.uk](mailto:info@millbrookpower.co.uk) Telephone: 0131 550 3380 and Post to: Millbrook Power Limited, 49 York Place, Edinburgh, EH1 3JD

#### **COMMENTS**

Bedford Borough Council has been consulted upon the above proposed development as; (1) a Local Planning Authority within whose boundaries part of the site is located and; (2) as an authority which, because of the sites position straddling the Borough boundary with Central Bedfordshire is likely to experience many of the impacts of the proposed development as a neighbouring authority.

The development project is described in the following terms: -

A new Power Generation Plant in the form of a Simple Cycle Gas Turbine (SCGT) peaking power generating station, fuelled by natural gas and capable of providing a rated electrical output of up to 299 Megawatts (MW).

The Power Generation Plant comprises:

- \* Generating equipment including up to five Gas Turbine Generators, up to five exhaust gas flue stacks and balance of plant, which are located within the Generating Equipment Site;
- \* A new purpose built access road from Green Lane to the Generating Equipment Site;
- \* A temporary construction compound required during construction only;
- \* A new gas connection to bring natural gas to the Generating Equipment from the National Transmission System (NTS); and
- \* A new electrical connection to export power to the National Grid Electricity Transmission System.

The application is to be accompanied by an Environmental Impact Assessment.

A Preliminary Environmental Information Report (PEIR) has been lodged for comment.

## Comments on appearance and scale

The LPA notes that the Environmental Impact Assessment is to contain sections which will deal with the landscape and visual impacts and the cultural and heritage impacts of the development. Bedford Borough Council wishes the applicant to consider and provide evidence that the EIA has evaluated the merits/impacts of alternative stack numbers, heights and diameters on the landscape and upon heritage assets in the area both as a free standing development and cumulatively with the permitted Covanta development and other potentially significant developments in the vicinity of the site.

## Heritage issues

The methods of assessment of impacts on heritage assets and distances for study areas as set out in the PEIR are considered acceptable towards undertaking an Environmental Impact Assessment.

It is, however, noted that the Bedford Borough Historic Environment Record has not been consulted as part of the PEIR and it is requested that it be consulted as part of the EIA.

## Traffic generation

The local transport impacts of the proposals are likely to be very modest once the site is operational as no raw materials will enter or exit the site by road and staff numbers are not expected to exceed five per shift on a 24 hour, three shift rotation basis.

During the 22 month construction/decommission and maintenance periods however traffic generation will be higher. Bedford Borough Council will expect that access to and from the site be controlled by a Construction Traffic Management Plan. Due to existing weight restrictions on surrounding local roads it is considered likely that most of this traffic will be on the Green Lane route directly from the A421 and outside of peak hours. Traffic counts and a full travel assessment should be carried out to establish existing levels of local traffic and identify the scale of change and that will result from the development both on Green Lane and other affected roads. This will then inform what and where transport mitigation measures are necessary to address the impacts during the construction period.

Bedford Borough Council therefore expects discussions about routing to continue with both Bedford and Central Bedfordshire Highways Departments and these discussions will inform the choice of proposed route option(s) for accessing the gas and electricity connection infrastructure during construction and maintenance.

## Gas Connection route

Whilst both routes are outside of Bedford Borough boundaries the proposed gas route 5 appears to be shorter and likely to have less short and long term impact upon the landscape.

## Electrical Connection

The net increase of 6 electricity transmission pylons is likely to have an adverse effect on the local landscape. In terms of their prominence in the landscape the impact might be at least as significant as the generating plant itself. An assessment of visual impacts should include consideration of the impacts of the development in its entirety and include the pylons.

Bedford Borough Council also has the following questions/comments that need to be addressed: -

1. Section 2.1.7 How can the Low Level Restoration Scheme (LLRS) be completed without the buttressing and re-profiling to the eastern side of the pit being completed?
2. Section 3.6 mentions the Minerals and Waste Local Plan: Strategic Sites and Policies (2014) (MWLP:SSP) and that Rookery Pit is a strategic site for waste management purposes. For information whilst Rookery Pit south is allocated for waste management purposes in the MWLP:SSP (2014) the pit is

some 100ha in extent and there should be sufficient land for other compatible uses whilst still enabling the site to be used for the development of waste recovery uses and landfill.

3. Section 3.6 There is no mention of the MWLP2005. This currently contains saved general and environmental policies against which minerals and waste development is assessed. There is also no mention of the 'Managing Waste in New Developments' SPD.

4. Section 7 (noise) No account taken of any impact on footpath users as NSRs.

5. Section 12 (Rights of Way) 12.4.9 footpaths proposed as part of the LLRS have not been taken into account and are not referred to. One path will go round the attenuation pond in Rookery Pit south and is relatively close to the facility. Others run along the edge of the pit (see Restoration Strategy Plan: Public Rights of Way n. 8.8C in S106 for BC/CM/2000/8). Footpaths FP16/FP12/FP15 are located to the west of Rookery Pit south and the railway line. Footpaths FP14/FP65 are to the south of the pit. I attach a copy of the footpaths plan that is in the S106 agreement for Rookery ROMP.

6. The Covanta proposals provide additional footpath links and upgrade some of the paths provided for in the LLRS to footpath/cycleways. Improved connections to the footpaths in the vicinity of the site may be achieved if the Covanta scheme proceeds and should be explored in connection with the Millbrook Power Station proposal. Please see attached footpath plan.

7. Section 12 (construction/decommissioning) 12.4.38 – construction movements. There is a need to take account of the potential traffic created by the construction of Covanta – which could take place at a similar time as the construction of the Millbrook Power Plant. The figures for this are set out in the Transport Assessment for the Rookery South Resource Recovery Facility application which was submitted to the Infrastructure Planning Commission in August 2010 and which are available on the Planning Inspectorate website.

8. There is likely to be other development taking place within the Pit relating to waste management activity and also waste landfill. However, there is currently no detailed information on this although there was an enquiry, which was in the public arena, approximately 15 months ago.

9. There is a need to take into account the ongoing traffic from Stewartby landfill which is accessed off Green Lane between the proposed access road to the power station and the C94. Landfill at this site ceased two years ago but soils for restoration purposes are still being imported. Approximately 17,500 loads of soils are still required but importation is likely to be limited in 2015 and will, therefore, continue into 2016 and 2017. The operator advises that there could be an average of 75-80 loads/day with numbers varying between 20 and 1250 loads depending on availability.

10. Section 12. For information the 'old A421' is now the 'C94'.

I hope that the above comments and observations will assist in refining the EIA prior to the submission of any application. Bedford Borough Council would encourage you to continue the dialogue with the council and with other groups and organisations with a view to ensuring the best possible development proposal and the minimisation of any environmental impacts.

Signed:

A black rectangular redaction box covering the signature of the Assistant Director.

P Rowland Assistant Director (Planning)

Objection Date: 18.11.14





**LEGEND**

- Application site boundary
- Local authority boundary
- Existing Features**
- Public footpath
- Long distance footpath
- Proposed Features**
- Proposed dedicated footpaths
- Proposed permissive footpaths

**Note:** Locations I and U are not shown on the drawing

Rev C: Proposed permissive path between L and TP 02/08/10  
 FP 72 omitted.  
 Rev B: PROWC amended as per CDC email of 23/07/10. Drawing rescaled to 1:5000.  
 Rev A: Addition of Local Authority boundaries MA 18/06/10

Date	May 2010
A2 Scale	1:5000
Drawn by	MA / TP
Checked by	MOC
Figure Number	8.8 C

**WYG Planning & Design**  
 21 Park Road, Chalfont, CP10 3JQ  
 Tel: +44 (0) 29 2672600 Fax: +44 (0) 29 2672 5955  
 Email: info@wyg.com www.wyg.com

The Rookery Low Level Restoration Scheme  
 Restoration Strategy; Public Rights Of Way



Based upon the Ordnance Survey map with the permission of the Controller of Her Majesty's Stationery Office, London, UK.  
 WYG Environment Planning Division LAR 8310  
 Project Number: 01 1200 11200



# Development Management

## Central Bedfordshire Council

Priory House, Monks Walk  
Chicksands, Shefford  
Bedfordshire SG17 5TQ  
www.centralbedfordshire.gov.uk



Mr N Johnson  
Millbrook Power Ltd  
49 York Place  
Edinburgh  
EH1 3JD

**Contact** Annabel Robinson  
**Direct Dial** [REDACTED]  
**Email** [planning@centralbedfordshire.gov.uk](mailto:planning@centralbedfordshire.gov.uk)  
**Your Ref**  
**Date** 13 November 2014

Dear Mr Johnson,

**Application No:** CB/14/03977/PAPP  
**Location:** Millbrook Power Ltd, Rookery Pit, Millbrook, Bedford, MK45 2JH  
**Proposal:** Consultation on Preliminary Environmental Information Report (PEIR)

Thank you for your letter received on the 09 October 2014 regarding the above.

This consultation relates only to consideration of the information within Preliminary Environmental Information Report, and not a comment on the suitability of the general Millbrook Power project.

### General Comments on the PEIR made by the Councils Minerals and Waste Team:

1. Section 2.1.7 How can the Low Level Restoration Scheme (LLRS) be completed without the buttressing and reprofiling to the eastern side of the pit being completed?
2. Section 3.6 mentions the MWLP:SSP and that Rookery Pit is a strategic site for waste management purposes. For information whilst Rookery Pit south is allocated for waste management purposes the pit is some 100ha in extent and there should be sufficient land for other compatible uses whilst still enabling the site to be used for the development of waste recovery uses and landfill.
3. Section 3.6 There is no mention of the MWLP2005. This currently contains saved general and environmental policies against which minerals and waste development is assessed. There is also no mention of the 'Managing Waste in New Developments' SPD.
4. Section 7 (Noise) No account taken of any impact on footpath users as NSRs.
5. Section 12 (Rights of Way) 12.4.9 footpaths proposed as part of the LLRS have not been taken into account and are not referred to. One path will go round the attenuation pond in Rookery Pit south and is relatively close to the facility. Others run along the edge of the pit (see Restoration Strategy Plan: Public Rights of Way n. 8.8C in S106 for BC/CM/2000/8). Footpaths FP16/FP12/FP15 are located to the west of Rookery Pit south and the railway line. Footpaths FP14/FP65 are to the south of the pit.
6. The Covanta proposals provide additional footpath links and upgrade some of the paths provided for in the LLRS to footpath/cycleways.
7. Section 12 (construction/decommissioning) 12.4.38 – construction movements. There is a need to take account of the potential traffic created by the construction of Covanta – which could take place at a similar time to the Millbrook Power Plant. The figures for this are set out in the Transport Assessment for the Rookery South Resource Recovery Facility application which was submitted to the Infrastructure Planning Commission in August 2010 and which are available on the Planning Inspectorate website.
8. There is likely to be other development taking place within the Pit relating to waste management activity and also waste landfill.

9. Section 12. For information the 'old A421' is now the 'C94'.

## **Air Quality**

No comment to make regarding the information on this issue provided within the PEIR, full assessment shall be undertaken when the information is provided in the EIA. Full air quality assessment and any proposed mitigation will need to achieve standards in the relevant guidance.

## **Noise and Vibration**

BS4142:1997, has been referred to, has been revoked and BS4142:2014 has been published. The scope of this standard has now been clarified and the assertion in 7.2.21 is no longer valid. I would therefore expect to see an assessment undertaken in line with this standard and look to achieve Central Bedfordshire Councils targets in this regard.

With this in mind the mitigation in section 7.3 could be subject to enhancements/additions based on the full noise assessment. It is suggested that the full noise assessment to quantify any noise generation, results compared and analysed against the appropriate methodology which will in turn inform any mitigation/design/siting proposals to ensure adequate protection for any sensitive receptors as set out in the PEIR.

Table 7.15 suggests that there are no NSR's along the access road, from work on the Covanta Project it came to light that there is a camp site in this vicinity used by the sailing club which should be considered.

In 7.5.6 the operation of the gas above ground installation the report states that a 'low hum' would be generated. Whilst it is appreciated that there is some distance to the nearest receptor but I would like to see this low frequency noise quantified/clarified.

## **Ecology**

Within the Preliminary Environmental Information Report it is noted that a Phase 1 habitat survey and Phase 2 species surveys have been undertaken to investigate potential impacts on key ecological receptors of the proposals. Necessary mitigation will be species specific.

The Councils Ecologist is satisfied that baseline conditions will be based on the implemented low level restoration scheme and acknowledges enhancement measures will be undertaken in accordance with NPPF.

It is considered that the baseline information provided in the PEIR is reasonable to inform the future surveys.

## **Water Quality and Resources**

No comment to make regarding the information on this issue provided within the PEIR, full assessment shall be undertaken when the information is provided in the EIA.

## **Ground Conditions**

No comment to make regarding the information on this issue provided within the PEIR, full assessment shall be undertaken when the information is provided in the EIA.

## **Landscape and Visual Impacts**

These comments cover the impact on landscape character, visual intrusion, mitigation and

the need for a mitigation strategy for Rookery Pit as a whole. They highlight aspects where further work is required, in relation to the information submitted with the PEIR.

## 1) Visual Impact:

### 1.1. Zone of Theoretical Visibility

The LVIA is not as comprehensive as required for a development of this nature. The Zone of Visual Influence has been limited to a 5km radius - whilst this area will experience the greatest change, the impact over 10km would highlight the communities which would be affected by the proposal. The ZVI diagram Fig 11.1 does not differentiate between the visibility of the vertical features and the built form of the plant and substation.

It would be preferable to have a conventional ZTVI map showing visual impact of these different aspects over a wider area.

### 1.2 Photographic Viewpoints

The view points chosen are appropriate, but six further viewpoints should be assessed. The report acknowledges that additional winter survey work is required to test visibility. This would then inform the assessment of visual effects.

Suggested further locations -

- i) From the eastern boundary of the Millennium Country Park
- ii) From footpath 14
- iii) From Pillinge Farm
- iv) A view looking across the development with the Greensand ridge as the back ground.
- v) The view from London Lane, Houghton Conquest
- vi) From Houghton Conquest - including footpaths 3 or 10

### 1.3 Montages

Additional photo montages are also required, particularly for short distance views from the Country Park, Millbrook village and Ampthill Park House.

The montages currently available highlight the intrusive nature of the transmission towers. Although there is a line of pylons already (one of which would be removed) and the railway catenary, these structures are considered to be detracting features, particularly in the view from the Ridge.

### 1.4 Cumulative Impact

The cumulative impact of the development has not been fully examined eg the PEIR has not taken the visual impact of the wind turbine at the Millennium Country Park and the proposed turbine at Stewartby landfill site into consideration. (FMV turbine is illustrated on montages).

The information provided with the EIA should illustrate in drawing form the impact of the MP proposal without Covanta - and without the benefits of the Covanta landscape scheme. In the Montages - the Covanta EfW building acts as a screen in views from the north. As the development is without significant landscape screening, the power station would be seen from the rights of way and some residential properties in Stewartby. Whilst the latter is an issue for BBC, the visual impact from public access routes needs to be fully considered and mitigation designed accordingly.

### 1.5 Landscape mitigation:

The "Illustrative Visual" (consultation leaflet) of the MP development does not show strategic landscape planting on the Application site. The "woodland" planting to the south is part of the Low Level Restoration Scheme, the land for which is currently being excavated. The proposed planting would need around 15 years growth to achieve partial screening of the proposal. The rest of Rookery Pit appears "green" as if it was open space.

## 2 Landscape Character / Enjoyment of the Landscape:

The development will be a major new industrial feature within the Marston Vale, in an area which has a recreational focus, being adjacent to the Millennium Country Park. Although the Rookery Pit site has been zoned for landfill and waste disposal activities, it is still important that development is designed to be sensitive to the rural location, which is highly visible in views from heritage sites along the Greensand Ridge. Current landscape guidance produced by Natural England places a high emphasis on the cultural qualities of the brick making landscape. Current views in this western edge of the Vale are of open farmland, village landscapes, woodland and the longer distance views to the restored landfill sites of Brogborough and Stewartby. The Marston Vale is noted as an improving landscape - it is also a landscape of increasing importance as a recreational resource for the growing local community, as well as visitors to the Marston Vale forest.

Considerations of the Water Courses in the vicinity of the site should be undertaken including the route of the Bedford - Milton Keynes Waterway, this should be mapped on the water resources plan.

## 3 Conclusion:

It is important to view this proposal as an individual development which would stand alone without Covanta. Therefore additional montages are requested, in addition to further view points, having the development assessed with cumulative impact and as a standalone development is important. From the information submitted it appears that the pylons are likely to be the most intrusive aspect of the development, having assessed the information provided within the PEIR. The EIA should explore the use of underground cabling rather than overhead pylons, if this is not feasible then the possibility of the minimum number of pylons should be demonstrated and what mitigation is proposed (on or off site).

## **Traffic and Transport**

At this stage the highway authority have no comments to make with regards to the information within the PEIR. The highway implications will be considered as part of any subsequent transport assessment..

## **Archaeology and Cultural Heritage**

The bulk of the proposed development is located within Rookery Pit (HER 6681), one of the clay pits that provided the raw material for Stewartby Brickworks during the 20th century. In the wider project site area there are a number of known archaeological sites and features. On the south western edge of the existing clay pit is an Iron Age and Roman settlement (HER 19806) and to the south of that is a ring ditch known from aerial photography(HER 16566), which on morphological grounds is likely to be the remains of a Bronze Age funerary monument. There are also other as yet uncharacterised cropmark features within this area (HER 4469 and HER 9077), some of these may represent land boundaries of unknown date but frequently such cropmarks have been shown to belong to later prehistoric and Roman settlements. On the eastern boundary of the site is a scatter of medieval pottery has been found possibly indicating occupation of that period (HER 15892). These are heritage assets with archaeological interest as defined by the *National Planning Policy Framework (NPPF)* and the *National Policy Statement for Energy (EN-1)*.

Archaeological survey and research in the wider Marston Vale has been limited. However, recent investigations in advance of housing development at Stewartby to the north, a road scheme on the northern edge of the Marston Vale and along the route of various pipelines to the south and east have started to identify a range of previously unidentified sites within the Vale dating from the prehistoric to medieval periods. These sites are often difficult to detect remotely and can only be identified through intrusive investigation and suggest that the Vale contained a much more extensive settlement pattern than had previously been thought. Therefore, the wider project area has the potential to contain so far unidentified archaeological sites and features dating from the prehistoric period.

The proposed development site is also located within the setting of a number of Scheduled Monuments including, amongst others, Houghton House (HER 729 and SM 1013522) and Ampthill Castle (HER 810 and SM 10009630) in Greensand Ridge to the south, Thrupp End medieval settlement and moated sites (HER 31 and SM 1010364) to the west, The Rectory Moated site (HER 3236 and SM 1009588), Houghton Conquest to the east and Ampthill Park (HER 1369 and RPG 10000378). Under the terms of the *NPPF* and *National Policy Statement for Energy* these are designated heritage assets of the highest importance. Development within the setting of these designated heritage assets will have an impact on their significance.

The *Preliminary Environmental Information Report* deals with archaeology and cultural heritage issues in Chapter 13 (baseline information, significance, impacts and mitigation) and Technical Appendices – Volume 1, 12.3 (policy matters). The summary of the policy context is adequate.

The Archaeology Team's comments on an earlier consultation (CB/14/02453/OAC) are acknowledged in Table 13.4 and generally seem to have been accepted within the *Report*. The baseline information on archaeology and the cultural heritage will be collected through a desk-based assessment within a study area with a 5km radius for setting issues in relation to designated heritage assets and a 1 km radius for direct physical impacts on undesignated heritage assets. This is a reasonable approach identifying the baseline information on archaeology for the *Environmental Statement*. In 13.4.1 of the *Report* it is stated that there are no features of archaeological interest recorded in the Historic Environment Record for plant site. This is not the case as Rookery Pit itself is recorded in the HER (HER 6681) and is important as part of the remains of the brick making industry in the Marston Vale.

Further, detailed assessment of designated and undesignated heritage assets is proposed for the impact of the power generation plant, including the impact on the setting of the identified designated heritage assets, for the *Environmental Statement*. This will certainly be required. Photomontages taken from locations 3, 4, 5 and 9 as shown on Figure 11.2 will be required to illustrate the impact on Scheduled Monuments and Registered Parks showing the existing baseline situation, the view after development and with mitigation. The assessment of the impact of the proposal on the setting of designated heritage assets must conform to English Heritage's *The Setting of Heritage Assets* (2011), in particular 4.2 and the first four steps in the assessment process it describes.

Construction of the gas and electrical connections has the potential to affect as yet unrecorded archaeological remains. This potential impact was identified in the Archaeology Team's earlier comments as was the requirement for archaeological field evaluation to provide information on the location, extent and character of any archaeological remains that will be affected. The *Report* acknowledges this (Tables 13.12 and 13.13) and says that the scope of the evaluation will be agreed with this Authority. This is satisfactory, but it is important to note that the information from the evaluation is required to inform the *Environmental Statement* and does not form part of the mitigation process as suggested by the *Report* (Tables 13.12 and 13.13).

Section 13.3 of the *Report* briefly discusses mitigation measures. It suggests that "standard

mitigation measures include directing development away from known areas of buried archaeology and adherence to a CEMP to set out a process for notifying a local authority archaeologist of any archaeological remains are identified during the development. The avoidance of known archaeological remains is an important method for ensuring there are no damaging impacts on heritage assets with archaeological interest. This does rely on there being adequate information on the on archaeological remains before the development starts, hence the importance the pre-determination archaeological field evaluation of the gas and electrical connection corridors. However, the proposals for mitigation based on a reporting process embedded in the CEMP are wholly inadequate. There is no indication of how archaeological features will be identified in the development process nor of how the impact would be dealt with, presumably some form of investigation, once any remains had been reported. It is also not an appropriate way of dealing with the impact of the proposal on the brick pit (Table 13.10). This section also contradicts mitigation proposals identified in Tables 13.12 and 13.13 for archaeological investigation and recording which is an appropriate strategy. I suggest that the mitigation proposals contained in the first bullet point of 13.3.1, the use of CEMP procedures as the basis for archaeological mitigation, is deleted and replacement with a statement about agreeing an appropriate programme of investigation and recording agreed with this Authority.

### **Socio-economics**

No comment to make regarding the information on this issue provided within the PEIR, full assessment shall be undertaken when the information is provided in the EIA.

### **Conclusions**

The information submitted with the PEIR has provided the Local Authority with initial information. It is considered that the issues raised above should inform the additional information to be provided with the Environmental Impact Assessment, so full assessment of any impacts of the project can be undertaken.

Please note that the comments given above constitute an informal officer opinion and are intended for your guidance only. The content of this letter therefore does not bind the formal consideration of any Development Consent Order consultation by the Local Planning Authority.

Yours faithfully,

**Annabel Robinson**  
**Senior Planning Officer**

17/10/14

**NORTH HERTFORDSHIRE DISTRICT COUNCIL**

Council Offices, Gernon Road, Letchworth Garden City, Hertfordshire, SG6 3JF  
Telephone: (01462) 474000  
Text Phone: (01462) 474800



Dear Mr Wormald,

I am returning all your documents in relation to proposed gas fired power plants at Rookery South Pit. As the location is situated in Millbrook, Beds, therefore, this enquiry should be dealt by Bedford Borough Council. please see reverse for their address and telephone number.

With compliments

Regards

Sophie Tse  
TSO planning Dept.

www.north-herts.gov.uk



Dear Sir/ Madam,

**Re: Millbrook Power Limited: Proposed gas fired power plant at Rookery South Pit, Nr. Millbrook, Bedfordshire**

**Statutory consultation under Section 42 of the Planning Act 2008**

This is an additional copy of an important consultation that we have previously attempted to deliver to your planning department.

Peter Brett Associates act for Millbrook Power Limited.

You may be aware that Millbrook Power Limited is proposing to submit an application under the Planning Act 2008 in Q1 of 2015 for an up to 299MW gas fired power plant at Rookery South Pit, together with its integral gas connection and electrical connection (the "Project").

Pursuant to section 42 of the Planning Act 2008 (the "Act"), Millbrook Power Limited must consult with a variety of persons about its proposed application for the Project. The persons that Millbrook Power Limited is required to consult under section 42 include certain prescribed bodies (such as the Environment Agency and Natural England); local authorities within or near to the Project site; and those with an interest in the land to which the application for the Project relates (such as land owners, tenants, occupiers and those having the benefit of certain rights over the land) or those who may be able to bring a claim under certain land compensation legislation for the construction or use of the Project.



Registered Office: Caversham Bridge House, Waterman Place, Reading, Berkshire, RG1 8DN. UK. T: +44 (0)118 950 0761 F: +44 (0)118 959 7498  
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**Rhiannon Parrett**

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**Subject:** FW: Proposed Gas Fired Power plant at Rookery South Pit

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**From:** Sophie Tse [mailto: ]  
**Sent:** 27 October 2014 14:28  
**To:** Paul Wormald  
**Subject:** Proposed Gas Fired Power plant at Rookery South Pit

Dear Mr Wormald

Thank you for your letter dated 21<sup>st</sup> October 2014!

After consulting with our Conservation Manager Mr Simon Ellis, he has confirmed that we do not required the documents for our record.

Thanks and regards

Sophie Tse

Technical Support Officer

North Herts District Council

Council Offices

Gernon Road

Letchworth Garden City

Hertfordshire

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**Tom J. Koltis**  
Director

**Covanta Energy Limited**



Tel +

Fax+

Email

[Redacted]

[Redacted]

Mr. Paul Wormald  
Director of Planning for Waste and Energy  
Peter Brett Associates LLP  
16 Brewhouse Yard, Clerkenwell  
London EC1V 4LJ, England

10 November 2014

**Re: Response to Millbrook Power Limited statutory consultation**

Dear Paul:

Covanta Energy Limited is in receipt of the letter and the related documentation that you sent to us in connection with your proposed gas fired power plant at Rookery South. We greatly appreciate your sending us this material and are very hopeful that both of our projects can co-exist at the Rookery South location. However, to better allow us to understand how the proposed Millbrook Power project affects consented energy-from-waste project, we would be grateful if you could generate and provide us with a copy of a site plan which overlays the current Millbrook Power project with the Covanta energy-from-waste project.

We would also be happy to discuss and agree ahead of time protection provisions to assist you in submitting your planning application. Obviously, we will need to document the relationship between your project and Covanta, and our position is reserved accordingly. This letter - and any assistance - is on a without prejudice basis for the time being, and I very much look forward to working with you in this regard.

Please do not hesitate to contact me at the details listed above should you have any questions.

Kind regards,



Tom Koltis  
Director



## Rhiannon Parrett

---

**From:** Martin Hughes <[REDACTED]>  
**Sent:** 04 November 2014 11:25  
**To:** info@millbrookpower.co.uk  
**Subject:** Response to the consultation - Millbrook Power

Dear Sir/Madam,

I'd like to formally express concern regarding the construction of the transmissions towers on the Millbrook Power Project, especially with respect to the construction work that is planned to interfere with the [REDACTED] O-MIL-s42-ST-PBA-L-96 operation on the North side of our site. Figure 1.2 from your preliminary Environmental Information Report, shows a redline boundary that cuts across our engineering centre, this area of [REDACTED] O-MIL-s42-ST-PBA-L-96 is used extensively for the development of vehicles for the transportation and automotive sector, some of these vehicles are sensitive and confidential and must be kept in a secure environment.

There does not seem to have been due consideration for this element during your project planning phase which may result in significant economic detriment to our business which has not been included in your socio-economic investigation, this will need to be addressed.

We would welcome further discussion on this element so an agreeable position is found to mitigate the issues for our business.

With kindest regards

---

**Martin Hughes**

Director [REDACTED] O-MIL-s42-ST-PBA-L-96

[REDACTED]  
T: [REDACTED]  
M: [REDACTED]  
E: [REDACTED]

[REDACTED]



This mail has been sent from [REDACTED] O-MIL-s42-ST-PBA-L-96 Registered in England ([REDACTED]) Registered Office ([REDACTED])  
VAT Number [REDACTED]

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## Rhiannon Parrett

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**From:** [REDACTED]  
**Sent:** 17 October 2014 10:23  
**To:** Paul Wormald  
**Subject:** Re: Millbrook Power PGW/MPL

Please ignore prior email as it has arrived.

Best regards,

Adam

PLEASE NOTE MY NEW OFFICE NUMBER IS: [REDACTED]

**Adam Couzens, Portfolio Manager,** Trading style of O-MIL-s42-ST-PBA-133

Email address [REDACTED]

Tel: [REDACTED] Mob: [REDACTED] Fax: [REDACTED]

[REDACTED]  
Company address

Visit: [assetbasedlendinguk.co.uk](http://assetbasedlendinguk.co.uk)



[REDACTED] is a trading style of **O-MIL-s42-ST-PBA-L-133** A member of the **O-MIL-s42-ST-PBA-L-133** Group.

From:	Adam Couzens [REDACTED]
To:	[REDACTED]
Date:	17/10/2014 09:33
Subject:	Millbrook Power PGW/MPL

Dear Mr Wormald,

Please note that our new address is as per below. Accordingly we did not receive the courier copy of the package of information re. Millbrook Power and our being Mortgagee to **O-MIL-s42-ST-PBA-L-96**

Please can you re-send to the new address.

thank you

Best regards,

Adam

PLEASE NOTE MY NEW OFFICE NUMBER IS: [REDACTED]

**Adam Couzens, Portfolio Manager,** **O-MIL-s42-ST-PBA-L-133**

Email address [REDACTED]

Tel: [REDACTED] Mob: [REDACTED] Fax: [REDACTED]

Our new address is:

[REDACTED]  
Company address

## Rhiannon Parrett

---

**Subject:** FW: Millbrook Power Limited. Proposed gas fired plant at Rookery South Pitt Nr Millbrook Bedfordshire (TEF 33736)

**From:** Julia Carroll [mailto: [REDACTED]]

**Sent:** 11 November 2014 15:55

**To:** Paul Wormald

**Subject:** Millbrook Power Limited. Proposed gas fired plant at Rookery South Pitt Nr Millbrook Bedfordshire (TEF 33736)

Dear Mr Wormald,

We act on behalf of [REDACTED] trading as O2 and I have been passed copy of your letter in relation to the above.

My client has a telecommunications site marked in the Gas Connection Route Corridor 2 just off How Road. I would be grateful if you could confirm what works are required and the implications on the site as to how it will be affected and if indeed it will need to be relocated

Thanking you in advance

Kind regards

Julia

### JULIA CARROLL MRICS

Associate – technology, media and telecoms

Cluttons LLP, 2 Portman Street, London W1H 6DU

DD: [REDACTED] | M: [REDACTED] | E: [REDACTED]

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**Appendix 5.C: Phase 2 Section 42 Consultation  
responses as received as of 22<sup>nd</sup> September 2017**



**AnGLIAN Water Services Ltd**

Thorpe Wood House,  
Thorpe Wood,  
Peterborough  
PE3 6WT

Tel 07764989051

www.anglianwater.co.uk  
Our ref 00022464

Mr Dermot Scanlon  
Director  
Peter Brett Associates LLP  
33 Bowling Green Lane  
London  
EC1R 0BJ  
[Sent by e-mail]

10 July 2017,

Dear Mr Scanlon,

**Millbrook Power Limited: Proposed gas fired power plant at Rookery South Pit, Nr. Millbrook, Bedfordshire**

Thank you for the opportunity to comment on the above project. AnGLIAN Water is the sewerage and water undertaker for the proposed site. The following comments are submitted on behalf of AnGLIAN Water.

The Project as a whole including changes since the 2014 consultation

AnGLIAN Water previously provided comments on the above project as part of the 2014 consultation (AnGLIAN Water reference LDF/SP15 (O29)). The following comments are made in the context of those previously made.

We would welcome further discussions with Millbrook Power Ltd prior to the submission of the Draft DCO to the Planning Inspectorate for examination. In particular it would be helpful if we could discuss the following issues:

- Wording of the Draft DCO including protective provisions for the benefit of AnGLIAN Water.
- Requirement for water and/or wastewater services (if required).
- Impact of development on AnGLIAN Water's assets and the need for mitigation.
- Pre-construction surveys and ground investigations.

It is considered that protective provisions specifically for the benefit of AnGLIAN Water should be included as part of the wording of the Draft DCO.

Registered Office  
AnGLIAN Water Services Ltd  
Lancaster House, Lancaster Way,  
Ermine Business Park, Huntingdon,  
Cambridgeshire. PE29 6YJ  
Registered in England  
No. 2366656.

**an AWG Company**

These protective provisions are in addition to that for utility companies as set out in the model provisions for DCO applications. Appendix 1 of this letter outlines the recommended wording for inclusion in the Draft DCO.

In our previous response in 2014 we had previously highlighted that there were a number of existing water assets within the boundary of the site.

As noted in the consultation documentation the precise layout of the project has yet to be established. If it is not possible to incorporate existing water mains as part of the site layout there may be a need to divert these asset(s). We have a duty to divert existing mains where requested to do so although it would be at the applicant's expense.

If a diversion(s) is required you would need to make a formal application to Anglian Water for this purpose. Further details of the application process are available to view at the following address:

<http://www.anglianwater.co.uk/developers/diversion-of-a-water-main.aspx>

Updated Preliminary Environmental Information Report (PEIR)

It is noted that water is not generally required for the project as outlined in Chapter 9 (Water Quality and Resources) of the PEIR. In the event that a connection to the existing water supply network is required we would welcome further discussion on this issue.

It is noted that the focus of the Flood Risk Assessment (Volume G of the PEIR) is on the risk of flooding from both fluvial and surface water sources. It would be helpful to clarify whether there are any foul flows which will discharge into the public sewerage network in Anglian Water's ownership.

The Strategic Planning Team is responsible for comment on DCO applications on behalf of Anglian Water. Please send any further correspondence relating to the above project to myself at the following address:

Strategic Planning Team  
Water Resources  
Anglian Water Services Limited  
Thorpe Wood House  
Thorpe Wood  
Peterborough  
PE3 6WT

Should you have any queries relating to this response please let me know.

Yours sincerely



Stewart Patience

**Strategic and Spatial Planning Manager**

## **APPENDIX 1 - RECOMMENDED PROTECTIVE PROVISIONS FOR THE BENEFIT OF ANGLIAN WATER**

### **FOR THE PROTECTION OF ANGLIAN WATER**

(1) For the protection of Anglian Water, the following provisions shall, unless otherwise agreed in writing between the undertaker and Anglian Water, have effect.

(2) In this part of this schedule –

“apparatus” means any works, mains, pipes or other apparatus belonging to or maintained by Anglian Water for the purposes of water supply and sewerage and

(a) any drain or works vested in Anglian Water under The Water Industry Act 1991,

(b) any sewer which is so vested or is the subject of a notice of intention to adopt given under section 102 (4) of The Water Industry Act 1991 or an agreement to adopt made under section 104 of that Act,

and includes a sludge main, disposal main or sewer outfall and any manholes, ventilating shafts, pumps or other accessories forming part of any sewer, drain, or works (within the meaning of section 219 of that Act) and any structure in which apparatus is or is to be lodged or which gives or will give access to apparatus.

“alternative apparatus” means alternative apparatus adequate to enable Anglian Water to fulfil its statutory functions in not less efficient a manner than previously;

“functions” includes powers and duties

“in” in a context referring to apparatus or alternative apparatus in land includes a reference to apparatus or alternative apparatus under, over or upon land; and

“plan” includes sections, drawings, specifications and method statements.

(3) The Company shall not interfere with, build over or near to any Apparatus within the Order Land or execute the placing, installation, bedding, packing, removal, connection or disconnection of any apparatus, or execute any filling around the apparatus (where the apparatus is laid in a trench) within the standard protection strips which are the strips of land falling the following distances to either side of the medial line of any relevant pipe or apparatus; 2.25 metres where the diameter of the pipe is less than 150 millimetres, 3 metres where the diameter of the pipe is between 150 and 450 millimetres, 4.5 metres where the diameter of the pipe is between

450 and 750 millimetres and 6 metres where the diameter of the pipe exceeds 750 millimetres unless otherwise agreed in writing with Anglian Water, such agreement not to be unreasonably withheld or delayed, and such provision being brought to the attention of any agent or contractor responsible for carrying out any work on behalf of the Company.

(4) The alteration, extension, removal or re-location of any apparatus shall not be implemented until

(a) any requirement for any permits under the Environmental Permitting Regulations 2010 or other legislations and any other associated consents are obtained, and any approval or agreement required from Anglian Water on alternative outfall locations as a result of such re-location are approved, such approvals from Anglian Water not to be unreasonably withheld or delayed; and

(b) the Company has made the appropriate application required under the Water Industry Act 1991 together with a plan and section of the works proposed and Anglian Water has agreed all of the contractual documentation required under the Water Industry Act 1991, such agreement not to be unreasonably withheld or delayed; and such works to be executed only in accordance with the plan, section and description submitted and in accordance with such reasonable requirements as may be made by Anglian Water for the alteration or otherwise for the protection of the apparatus, or for securing access to it.

(5) In the situation, where in exercise of the powers conferred by the Order, the Company acquires any interest in any land in which Apparatus is placed and such apparatus is to be relocated, extended, removed or altered in any way, no alteration or extension shall take place until Anglian Water has established to its reasonable satisfaction, contingency arrangements in order to conduct its functions for the duration of the works to relocate, extend, remove or alter the apparatus.

(6) Regardless of any provision in this Order or anything shown on any plan, the Company must not acquire any apparatus otherwise than by agreement, and before extinguishing any existing rights for Anglian Water to use, keep, inspect, renew and maintain its apparatus in the Order land, the Company shall, with the agreement of Anglian Water, create a new right to use, keep, inspect, renew and maintain the apparatus that is reasonably convenient for Anglian Water such agreement not to be unreasonably withheld or delayed, and to be subject to arbitration under article 59.

(7) If in consequence of the exercise of the powers conferred by the Order the access to any apparatus is materially obstructed the Company shall provide such alternative means of access to such apparatus as will enable Anglian Water to maintain or use the



apparatus no less effectively than was possible before such obstruction.

(8) If in consequence of the exercise of the powers conferred by the Order, previously unmapped sewers, lateral drains or other apparatus are identified by the company, notification of the location of such assets will immediately be given to Anglian Water and afforded the same protection of other Anglian Water assets.

(9) If for any reason or in consequence of the construction of any of the works referred to in paragraphs 4 to 6 and 8 above any damage is caused to any apparatus (other than apparatus the repair of which is not reasonably necessary in view of its intended removal for the purposes of those works) or property of Anglian Water, or there is any interruption in any service provided, or in the supply of any goods, by Anglian Water, the Company shall,

(a) bear and pay the cost reasonably incurred by Anglian Water in making good any damage or restoring the supply; and

(b) make reasonable compensation to Anglian Water for any other expenses, loss, damages, penalty or costs incurred by Anglian Water

by reason or in consequence of any such damage or interruption.



# BEDFORD BOROUGH COUNCIL

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INVESTOR IN PEOPLE

Chief Executive: P. J. Simpkins

Mr N Johnson  
Stag Energy  
49 York Place  
Edinburgh  
EH1 3JD

Please ask for: Derek Lawrence  
Direct line: 01234 718537  
E-mail: derek.lawrence@bedford.gov.uk  
Fax no:  
Your ref:  
Our ref: 17/01786/LPA  
Date: 30/06/2017

Dear Mr Johnson,

**Application No: 17/01786/LPA**

**Location: Millbrook Power Ltd, Rookery Pit, Millbrook, Bedford, MK45 2JH**

**Proposal: Statutory consultation under Section 42 of the Planning Act 2008.**

Thank you for your letter and consultation documentation from Peter Brett Associates dated 22<sup>nd</sup> May 2017 regarding the above.

This letter should be read in conjunction with the Council's response to the PEIR consultation.

The Council acknowledges the Section 42 Consultation, but does not wish to make any comments at this time.

Please note that the comments given above constitute an informal officer opinion and are intended for your guidance only. The content of this letter therefore does not bind the formal consideration of any Development Consent Order consultation by the Local Planning Authority.

The Council will wish to assist and participate as far as it can in achieving a high quality Environmental Statement in conjunction with Central Bedfordshire Council within whose district the majority of the development is located.

Yours sincerely

**Derek Lawrence**

Service Manager Development Management (Planning Services)

*Date: 12 June 2017*

Submitted by email to: [info@millbrookpower.co.uk](mailto:info@millbrookpower.co.uk) and [London@peterbrett.com](mailto:London@peterbrett.com)

Dear Sir/ Madam

**Re: Millbrook Power Limited: proposed gas fired power plant at Rookery South Pit near Millbrook on the Central Bedfordshire and Bedford boundary**

Thank you for your letter notifying Buckinghamshire County Council (BCC) of the consultation on the proposed gas fired power plant at Rookery South Pit near Millbrook on the Central Bedfordshire and Bedford boundary. BCC is grateful for the opportunity to contribute to shaping the proposals for the power plant.

BCC acknowledges the importance of consultation under section 42 of the Planning Act 2008. Within Buckinghamshire, BCC has a statutory role for strategic planning as the County Highways Authority, County Transport Authority, County Flood Authority, County Education Authority and County Minerals and Waste Planning Authority. It also has an obligation for joint working with District Councils within Buckinghamshire on their Local Plans. The County Council also fulfils other functions which advise on planning proposals such as the County Archaeology service which maintains the local Historic Environment Record, the County Ecology Service which has responsibility for monitoring and protecting the natural environment including the maintenance of the Bucks and Milton Keynes Environmental Records Centre and ecological resource of the County and the Public Rights of Way service which has responsibility for the managing and maintaining the County's Definitive Map.

BCC as a statutory Authority has an influencing role over County wide strategic planning matters with each of the Districts within the County as part of the duty to co-operate (Localism Act 2011) and a public health obligation to safeguard social, economic and environmental wellbeing of the County.

BCC acknowledges the positive contribution the project can make to the energy needs of communities. Furthermore, in consideration of the content of the Preliminary Environmental Information Report (PEIR) it is concluded that an increase in traffic flow within Buckinghamshire as a result of the proposals would not be considered a severe residual impact of the Millbrook Power development and could be attributed to natural fluctuation.

Please do not hesitate to consult BCC on any other aspects of the proposed project. If you have any queries, please contact me via the details below.

Yours sincerely



*Rachel Wileman*

**Rachel Wileman**

Head of Strategic Planning and Infrastructure

Telephone: 01296 387 092

Email: [strat\\_planning@buckscc.gov.uk](mailto:strat_planning@buckscc.gov.uk)



# Development Management

## Central Bedfordshire Council

Priory House, Monks Walk  
Chicksands, Shefford  
Bedfordshire SG17 5TQ  
www.centralbedfordshire.gov.uk



Mr D Scanlon  
Peter Brett Associates LLP  
33 Bowling Green Lane  
London  
EC1R 0BJ

**Contact** Annabel Robinson  
**Direct Dial** 0300 300 4158  
**Email** [planning@centralbedfordshire.gov.uk](mailto:planning@centralbedfordshire.gov.uk)  
**Your Ref**  
**Date** 29 June 2017

Dear Mr Scanlon,

**Application No:** CB/17/02610/PAPP  
**Location:** Millbrook Power, Rookery Pit, Millbrook, Bedford, MK45 2JH  
**Proposal:** Consultation on Preliminary Environmental Information Report PEIR.

Thank you for your letter received on the 23 May 2017 regarding the above.

The Local Authority has undertaken some internal consultations to ensure that the content of the PEIR has sufficient information to consider at a later date. Please see comments below:

### Minerals and Waste

The applicant appears to be taking into account the adjacent Resource Recovery Facility DCO. Therefore I have no comments at this stage.

### Ecology

As with the 2014 PIER I have no concerns regarding the information submitted. I note that a Phase 1 habitat survey and Phase 2 species surveys have been undertaken to investigate potential impacts on key ecological receptors of the proposals. Necessary mitigation will be species specific.

I am satisfied that baseline conditions will be based on the implemented LLRS and I acknowledge enhancement measures will be undertaken in accordance with NPPF.

### Archaeology

The Preliminary Environmental Information Report deals with archaeology and cultural heritage issues in Chapter 13 (baseline information, significance, impacts and mitigation) and Technical Appendices – Volume K.

The Archaeology Teams comments on an earlier consultation (CB/14/03977/PAPP) and subsequent informal discussions about mitigation options are acknowledged in Chapter 13 of the PEIR. The baseline information on archaeology and the cultural heritage will be collected through a desk-based assessment within a study area with a 5km radius for setting issues in relation to designated heritage assets and a 1 km radius for direct physical impacts on undesignated heritage assets. This is a reasonable approach identifying the baseline information on archaeology for the Environmental Statement.

The Archaeological Desk-Based Assessment submitted at Technical Appendix Volume K is dated August 2014 and is, therefore, now three years old. However, it is stated in the PEIR (13.5.8) that the Assessment will be updated for the Environmental Statement that will

accompany the DCO application for this development. The Assessment will also need to be expanded to cover the impact of the proposed development on the designate heritage assets following the methods and principles described in Historic England (2015) The Setting of Heritage Assets Historic Environment Advice in Planning: 3. At present the setting of the designated heritage assets, and in particular the Scheduled Monuments, is dealt with in Chapter 11 and Appendix Volume I of the PEIR. The setting of a designated heritage asset is not purely a matter of visual impact as had been made clear in a recent High Court decision (Steer v SSCLG, 22 June 2017) and it should, therefore, be dealt with in the Historic Environment chapter of the Environmental Statement.

The construction of the gas and electricity connectors has been identified as having the potential to buried archaeological remains (non designated heritage assets). This is a correct assessment of the potential impact of the scheme. In their 2014 advice the Archaeology Team indicated that an archaeological field evaluation of the route of the connectors should be undertaken to provide baseline information on archaeology for the these parts of the proposed development. Following further discussions with the applicant's archaeological consultant an alternative approach has been identified in this instance involving mitigating the impact of the connectors on archaeology through a programme of archaeological investigation secured as a Requirement of the Development Control Order. This does reflect the substance of the discussions between the Archaeology Team and the applicant's archaeological consultant.

Subject to the comments above the proposals for the inclusion of archaeology in the Environmental Statement to accompany the DCO application described in the submitted documents appear adequate.

### **Landscape Visual Assessment**

I have few comments to make at this stage, having been consulted on the earlier submission in 2014. This development will add a significant structure to the Rookery Site, but will be seen as secondary in scale to the Covanta RRF. I am satisfied that the LVIA studies will and have been undertaken to the LI Guidelines. Key views will be affected eg from Ampthill Park and the Greensand Escarpment and also from many rights of way across the vale. It is noted that the intention is to maintain a dark site, which is to be welcomed ,as this will reduce the night time impact. The proposals to underground pylons is also welcomed.

A full landscaping scheme will be required. It would also be beneficial to have a commitment to some off site planting eg to help mitigate views from public right of way and the residential properties identified as having an adverse change in the view. This is not expected to be an extensive contribution, but as the site is within the Forest of Marston Vale , the site needs to support the aims of The Forest Plan and meet the 30% tree canopy expectation.

It would be helpful to be involved in the development of the colour palette and Landscape and Ecology Management Plan in due course.

### **Highways**

The provision of a gas turbine for electricity generation would have highway aspects relating to access from Green Lane which is said to be shared with the adjacent energy from waste site (EfW) and construction traffic.

If the EfW development does not go ahead or this development started first then a new access will need to be submitted as part of any DCO (Development Consent Order) application, though it should be pointed out that a ghost right turn access has already been approved through the EfW development which itself was subject to being granted through the DCO process. Details on construction vehicles including abnormal loads and full details of a construction traffic route would be required. I would not wish to see any routing from the

A507 through Lidlington, Millbrook or Marston Moretaine.

I have a concern over the access shown on drg 31116/2001/007 as works traffic is shown entering/exiting on both sides of Houghton Lane and regular access to the AGI site off an existing track access, whilst I agree in the short term some mitigation can be provided I have a concern over the longer term if those access point were to remain and become permanent. Drg 31116/20012006 shows the traffic management on Green Lane but I would question why the access itself would not be constructed prior to any commencement on site. We would of course need to see engineering layout for approval.

Notwithstanding this the wait here sign closest to the railway barriers for the proposed signals means that there could be concerns over traffic backing up and possibly onto the railway line. This is a matter for Network Rail to agree to and no doubt they will have been consulted on this matter as well.

As the development would be subject to a DCO details on the provision on cabling within the public highway would be identified and provided within that application. The turbine will run on gas and as such details on the nearest gas line should also be included within the DCO application.

### **General Conclusion**

In addition to the above the Council's Pollution Team, Public Health Team, SuDs Management Team, Flood Risk Team and Renewable's Team were consulted, however did not raise any comments on the content of the PEIR. Please note it may appropriate to liaise directly with Central Bedfordshire Council's Public Protection (Pollution) Team directly to ensure the noise issues we have discussed on the phone are considered appropriately.

With regard to the above, please include any additional comments in the final submission of the Environmental Impact Report, when the Council will be able to make a formal consultation response once the final document has been received.

Please note that the comments given above constitute an informal officer opinion and are intended for your guidance only. The content of this letter therefore does not bind the formal consideration of any planning process by the Local Planning Authority.

Yours sincerely,

**John Ellis**  
**Planning Manager West**





**Millbrook Power Limited – Proposed gas fired power plant at Rookery South Pit near Millbrook Beds. Statutory consultation under section 42 of the Planning Act 2008 – Phase 2 Statutory Consultation (29<sup>th</sup> May – 2<sup>nd</sup> July 2017).** CCB Comments 30<sup>th</sup> May 2017 to [info@millbrookpower.co.uk](mailto:info@millbrookpower.co.uk)

Thank you for consulting the Chilterns Conservation Board in connection with the above Nationally Significant Infrastructure Project (NSIP). The Chilterns Conservation Board was established as an independent body by Parliamentary Order in July 2004 and has 27 members, all drawn from local communities. The Board's purposes are stated in section 87 of the Countryside and Rights of Way Act 2000 (CROW Act), as:

*s 87 (1) It is the duty of a conservation board, in the exercise of their functions, to have regard to: (a) the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty, and (b) the purpose of increasing the understanding and enjoyment by the public of the special qualities of the area of outstanding natural beauty, but if it appears to the Board that there is a conflict between those purposes, they are to attach greater weight to the purposes mentioned in paragraph (a).*

*s87 (2) A conservation board, while having regard to the purposes mentioned in subsection (1) shall seek to foster the economic and social well-being of local communities within the area of outstanding natural beauty, but without incurring significant expenditure in doing so, and shall for that purpose co-operate with local authorities and public bodies whose functions include the promotion of economic or social development within the area of outstanding natural beauty'.*

The Board has published an AONB Management Plan 2014-2019 *A Framework for Action* and a series of position statements, which include guidance on development within the setting of the AONB (*Development Affecting the Setting of the Chilterns AONB*) available at

<http://www.chilternsaonb.org/uploads/files/ConservationBoard/PlanningDevelopment>. The Management Plan, which is confirmed as a material planning consideration in planning practice guidance, deals with setting at AONB Management Plan policy **D6** that 'full account should be taken of the likely impacts of developments on the setting of the AONB' (full document available at <http://www.chilternsaonb.org/conservation-board/management-plan.html>)

The nearest part of the AONB to the immediate south - south east of the Millbrook proposal is at Sharpenhoe Clappers, comprising 55 hectares of National Trust countryside including open access land on the escarpment and enjoying fine views to the north and north-west. From a site visit it is apparent that the AONB benefits from the wider landscape here and the views are important. The distance to the proposed NSIP development is some 12/13km. The Board would seek further detail on:

(1) The implications for this project on the skyline view and reassurances that the skyline would not be 'broken' by the proposed 35 metres stack tower structure associated with this proposal. The cumulative impact of this would also require commentary within the scope of the Infrastructure Planning (EIA) Regulations 2009; and

(2) Any proposed materials or landscaping which will serve to mitigate any visual impact in the wider view, or reassurances that these matters can be taken into account when considering the impacts on the AONB. We accept that these matters may be relevant for the development consent order and would ask that they are considered in the next stage of the preliminary environmental information report non-technical summary where it deals with landscape and visual assessment.

CCB proposes amendment to the content of paragraph 3.7.8 and 3.7.9 of the non-technical summary to include Sharpenhoe Clappers as a local viewpoint from an elevated part of the Chilterns AONB, reassurances are required to avoid any stack structure being visible on the skyline as well as some confirmation that materials and design are relevant to the mitigation of impacts. CCB is grateful that these matters can be the subject of inclusion in future landscape and visual impact assessment and that reassurance can be given as to the visual impact from these elevated viewpoints. **Michael Stubbs, Planning Adviser Chilterns Conservation Board, The Lodge, 90 Station Road, Chinnor, Oxon OX39 4HA**

Our Ref: ASN/BE/MB/1160/171789

Your Ref: MPL/S42

Date: 5 June 2017

Peter Brett Associates LLP  
33 Bowling Green Lane  
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EC1R 0BJ



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ASHBY DE LA ZOUCH  
LE65 2BY

**Telephone 0845 0701245**

Email  
CLHPipelinesystem@fishergerman.co.uk  
www.fishergerman.co.uk

Dear Sirs/Madam

### CLH Pipeline System

Thank you for your enquiry dated 22 May 2017. We can confirm that our client's apparatus, the CLH Pipeline System – Energy Act 2013 (CLH PS), may be affected by your proposals as indicated on the attached plan(s). The plan(s) supplied are intended for general guidance only and should not be relied upon for excavation or construction purposes. No guarantee is given regarding the accuracy of the information provided and in order to verify the accurate location of the pipeline in conjunction with your proposals you should contact, to arrange a site visit. Their contact details are given below.

**Central Services**  
**Ashdon Road**  
**Saffron Walden**  
**Essex, CB10 2NF**

**email: anne.swallow@clhps.uk**  
**Tel: 01799 564101**

When contacting Central Services, please quote the File Ref/Unique Number given at the top of this letter, which is specific to this enquiry. Please note that you should contact Central Services within 28 days of the date of this letter in order to validate this enquiry otherwise it will become void.

You should note that the interests of the CLH Pipeline System are conserved by means of the Energy Act 2013, in particular Part IV of the Act, and other legislation such as the Pipeline Safety Regulations 1996. It is, however, the Energy Act 2013 that prohibits any development and most intrusive activities within the Easement Strip without specific consent from CLH Pipeline System. CLH Pipeline System Easement Strips are 6 metres wide and can incorporate other associated CLH Pipeline System facilities.

Central Services will be able to provide guidance on the required procedures for entering into a Works Consent and provide confirmation on permitted development and intrusive activities. The whole process of obtaining Works Consent can take between four and six weeks depending on circumstances at the time of application.

To reiterate, you should not undertake any work or activity without first contacting the CLH Pipeline System Operator for advice and, if required, Works Consent. For your additional information please visit <http://www.lineearchbeforeudig.co.uk/index.php/useful-info>, standard requirements for working/crossing the CLH Pipeline System – Energy Act 2013.

You should also be aware that landowners and third parties have a duty of care not to carry out any works that have the potential to damage CLH Pipeline System apparatus. This duty of



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care applies even if the works themselves are situated more than 3 metres from the pipeline. Examples of such works are mineral extraction, mining, explosives, piling and windfarms.

Please note that implementation of any unapproved work that affects a CLH Pipeline System Easement Strip may result in serious consequences in terms of health and safety, expense and other attendant liabilities. In such cases it is the perpetrator of the act, together with any other promoting organisation, that shall be held fully accountable for any resulting damage.

Should you require any further assistance regarding this letter please contact the undersigned or alternatively, you can contact the Central Services using the details provided above.

Yours faithfully

**Fisher German LLP (CLH Pipeline System Land Agent)**

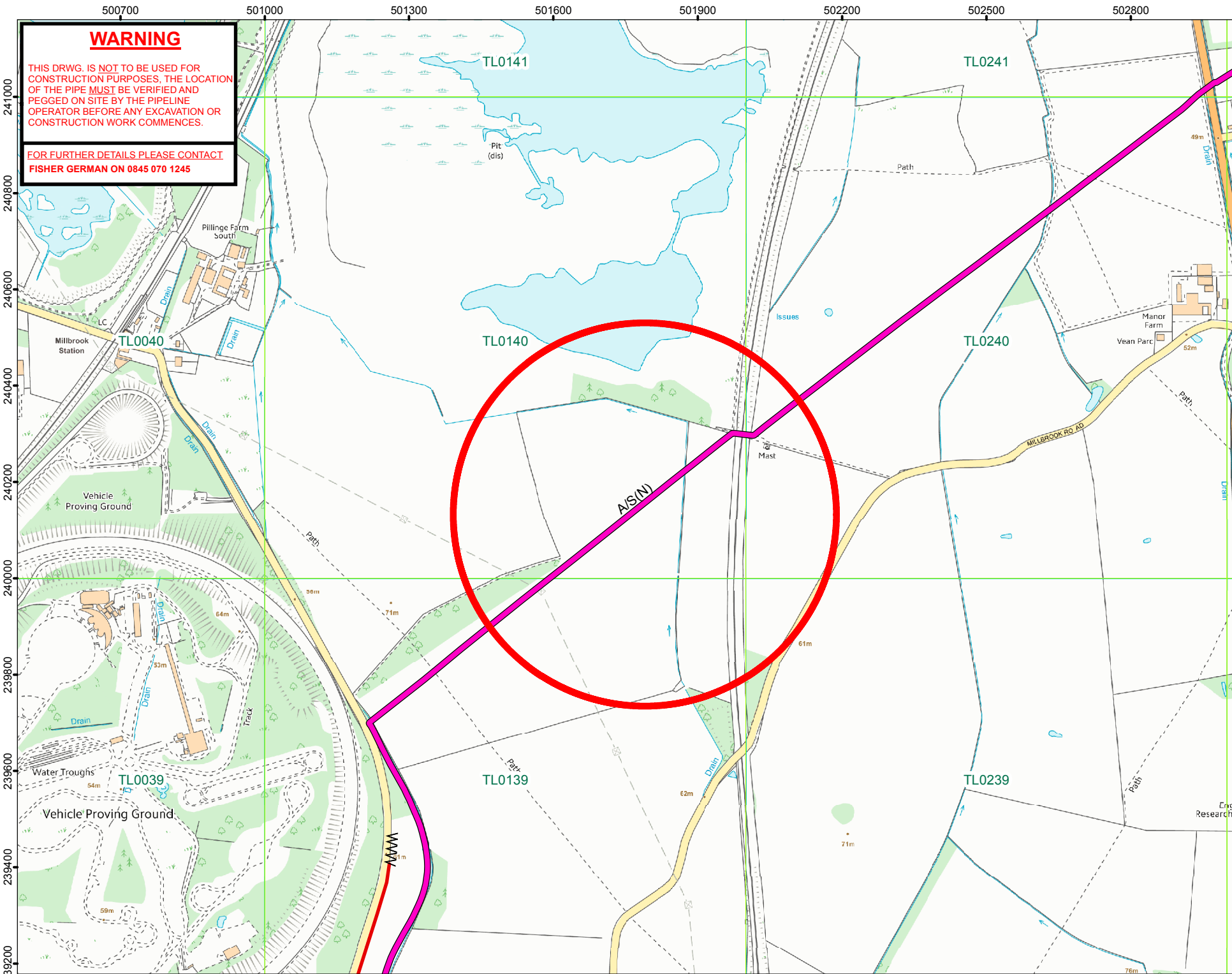
Enc Location Plan

CC Central Services  
Information for Central Services  
Third Party Contact Details:

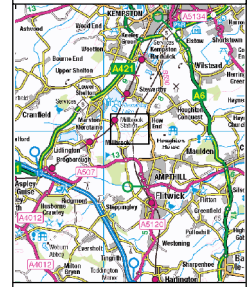
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FOR FURTHER DETAILS PLEASE CONTACT FISHER GERMAN ON 0845 070 1245



### OVERVIEW WINDOW



### Legend

- CLH\_PS
- Cathodic Protection

Site centre coordinates:  
501,751 - 240,169

SCALE: 1:10,000 @ A4  
DATE: 31/05/2017

Client:



TITLE:

LOCATION PLAN EXTRACT  
OF PIPELINE A/S(N)

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Norman Court, Ashby de la Zouch,  
Leicestershire, LE65 2UZ  
Telephone 0845 070 1245  
Fax: 01530 413896

# Millbrook Power Project

## Project Overview Document

On behalf of **Millbrook Power Limited**



Project Ref: 40334 | Rev: 0 | Date: May 2017





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## Project Glossary (including acronyms)

Acronym or term	Term	Description
Access Road	Access Road	The proposed purpose built full length access road from Green Lane to the Generating Equipment Site. This could also be delivered through the 'Short Access Road' as defined below in this Glossary.
AGI	Above Ground Installation	The Above Ground Installation incorporates the minimum offtake connection (MOC) facility, which would be owned by National Grid, and a Pipeline Inspection Gauge (PIG) Trap Facility (PTF), owned by Millbrook Power Limited.
Applicant	Applicant	Millbrook Power Limited (MPL)
BBC	Bedford Borough Council	Bedford Borough Council
CBC	Central Bedfordshire Council	Central Bedfordshire Council
Construction	construction	Within the PEIR this phrase refers to all construction activities associated with the Project. The construction phase is anticipated to commence in 2020 and be completed by 2022.
Construction Laydown Area	Construction Laydown Area	The area required during construction for storing materials and equipment. It is located within the Power Generation Plant Site.
Consultation	consultation	Procedures for assessing public, landowner and statutory consultee opinion about a plan or major development proposal including seeking the views of affected neighbours or others with an interest in the Project or affected land.
Covanta RRF	Covanta RRF Project	The proposed Resource Recovery Facility (RRF) to be developed by Covanta and Veolia to the north of the Generating Equipment Site and for which Covanta Rookery South Limited was granted the RRF Order.

cumulative effects	cumulative effects	Summation of effects that result from changes caused by a development in conjunction with other reasonably foreseeable development that is either consented but not yet constructed or is in the process of seeking consent.
dB(A)	A-weighting sound level	The sound pressure level determined when using the frequency-weighting network A. The A-weighting network modifies the electrical response of a sound level meter so that the sensitivity of the meter varies with frequency in approximately the same way that the sensitivity of the human hearing system varies with frequency. The human ear has a non-linear frequency response; it is less sensitive at low and high frequencies and most sensitive in the range of 1 to 4 kHz. The A-weighting is applied to measured or calculated sound pressure levels so that these levels correspond more closely to the response of the human ear. A-weighted sound levels are often denoted as dB(A).
DCO	Development Consent Order	A Development Consent Order (DCO) is made by the Secretary of State (SoS) pursuant to the Planning Act 2008 (PA 2008) to authorise a Nationally Significant Infrastructure Project (NSIP).
DCO Application	Development Consent Order Application	The Application for a DCO made to the SoS under Section 37 of the PA 2008 in respect of the Project, required pursuant to Section 31 of the PA 2008 because the Project constitutes an NSIP under Section 14(1)(a) and Section 15 PA 2008 by virtue of being an onshore generating station in England or Wales of 50 MW capacity or more.
Drax	Drax Group Plc	Drax is one of the UK's largest energy producers and acquired MPL from Stag Energy in 2016.
EA	The Environment Agency	The Environment Agency

effect	effect	The consequence of an impact on the environment.
EIA	Environmental Impact Assessment	The assessment of the potential likely significant environmental effects of the Project. Undertaken in accordance with the Infrastructure Planning (Environmental Impact Assessment) Regulations 2009.
EIA Regulations	EIA Regulations	For this project the relevant EIA Regulations are the Infrastructure Planning (Environmental Impact Assessment) Regulations 2009.
Electrical Connection	Electrical Connection	The new electrical connection to export power from the Generating Equipment to the National Grid Electricity Transmission System (NETS) for distribution to homes and businesses. It includes a new substation, up to two new underground electrical circuits and up to two Sealing End Compounds (SECs) to connect the substation to the Generating Equipment and the existing 400 kV network.
Emission	emission	A material that is expelled or released to the environment. Usually applied to gaseous or odorous discharges to the atmosphere.
environmental effect	environmental effect	The consequence of an impact on the environment.
environmental impact	environmental impact	A physical or measurable change to the environment attributable to the Project.
ES	Environmental Statement	A statement that includes the information that is reasonably required to assess the environmental effects of the development and which the applicant can, having regard to current knowledge and methods of assessment, reasonably be required to compile, but that includes at least the information referred to in the EIA Regulations.
ES NTS	Environmental Statement Non-Technical Summary	A report presenting a summary of the information in the Environmental Statement.
Gas Connection	Gas Connection	A new underground gas Pipeline connection and

		Above Ground Installation (AGI) to bring natural gas to the Generating Equipment from the Gas National Transmission System (NTS).
Gas Turbine Generator	Gas Turbine Generator	One Open Cycle Gas Turbine (OCGT) generator (as proposed in the Power Generation Plant) which utilises the combustion of gas and air to generate hot gases that are routed across turbine blades, which generate rotational forces that turn an electrical generator. The exhaust gases are discharged directly to a single stack without providing heat for a secondary steam cycle. The Gas Turbine Generator forms part of the Generating Equipment and is located within the Generating Equipment Site.
Generating Equipment	Generating Equipment	Gas Turbine Generator and Balance of Plant which are located on the Generating Equipment Site.
Generating Equipment Site	Generating Equipment Site	The site where the Generating Equipment is located.
Impact	Impact	A physical or measurable change to the environment attributable to the Project.
km	Kilometre	Measurement of distance (1000 metres).
kV	Kilovolt	Measurement of the amount of electric potential energy equal to 1000 volts.
M	metre	Measurement of length
mitigation measure	mitigation measure	Action proposed to avoid, prevent, reduce and where possible offset significant adverse effects arising from the whole or specific elements of a development.
Mm	millimetre	Measurement of length.
MPL	Millbrook Power Limited	Millbrook Power is a subsidiary business of Drax, which has been established specifically to develop the Project.
MW	megawatt	Measurement of power.
MWe	megawatt electric	Measurement of electrical power.
Noise	noise	Noise defined as unwanted sound, is measured in units of decibels, dB. The range of audible sounds is from 0dB to

		<p>140 dB. Two equal sources of sound, if added together will result in an increase in level of 3 dB i.e 50dB + 50dB = 53 dB. Increases in continuous sound are perceived in the following manner:</p> <ul style="list-style-type: none"> <li>• 1dB increase – barely perceptible</li> <li>• 3dB increase – just noticeable</li> <li>• 10dB increase – perceived as twice as loud.</li> </ul>
NSIP	Nationally Significant Infrastructure Project	The Power Generation Plant constitutes a Nationally Significant Infrastructure Project (NSIP) by virtue of s.14(1)(a) and s.15 of the Planning Act 2008 (PA 2008) which include within the definition of a NSIP any onshore generating station in England or Wales of 50 MWe capacity or more.
Order	Order	The Millbrook Power (Gas Fired Power Station) Order, being the development consent order made by the Secretary of State authorising the Project, a draft of which is submitted with the Application.
OCGT	Open Cycle Gas Turbine	<p>Gas plant technology system comprising Gas Turbine(s) fuelled by natural gas. The hot exhaust gases are routed directly to the stack without passing through a secondary steam turbine.</p> <p>Can also be referred to as SCGT.</p>
PA 2008	Planning Act 2008	UK legislation which passes responsibility for examining Development Consent Order (DCO) applications for NSIPs to the Planning Inspectorate, who will examine applications and make recommendations for a decision by the relevant Secretary of State (the Secretary of State for Business, Energy and Industrial Strategy in the case of energy NSIP applications).
PEIR	Preliminary Environmental Information Report	A report which has been prepared for Statutory Consultation. It provides information referred to in Part 1 of

		Schedule 4 of the EIA Regulations (information for inclusion in Environmental Statements) which has been compiled by the Applicant; and is reasonably required to assess the environmental effects of the development (and of any Associated Development).
2014 PEIR	2014 Preliminary Environmental Information Report	The report that was prepared in 2014 for statutory consultation.
PEIR NTS	Preliminary Environmental Impact Report Non-Technical Summary	The non-technical summary of the information contained in the Preliminary Environmental Impact Report.
2014 PEIR NTS	2014 Preliminary Environmental Impact Report Non-Technical Summary	The non-technical summary of the information in the 2014 Preliminary Environmental Impact Report.
Phase 1 Statutory Consultation	Phase 1 Statutory Consultation	Initial phase of statutory consultation under s42, s47 and s48 of PA 2008 between 13 October 2014 and 16 November 2014. This coincided with the publication of the 2014 PEIR.
Phase 2 Statutory Consultation	Phase 2 Statutory Consultation	Second phase of statutory consultation pursuant to s42, s47 and s48 of PA 2008 undertaken between 29 <sup>th</sup> May and 2 <sup>nd</sup> July 2017.
PINS	The Planning Inspectorate	The government agency responsible for examining applications for NSIPs.
Pipeline	Pipeline	The new underground gas pipeline connection proposed as part of the Gas Connection.
Power Generation Plant	Power Generation Plant	This is the Generating Equipment, Access Road and Construction Laydown Area.
Power Generation Plant Site	Power Generation Plant Site	The site in which the Power Generation Plant will be located.
Project	Project	Millbrook Power Project comprising the Power Generation Plant, Gas Connection and Electrical Connection.
Project Site	Project Site	The entire area covered by or required in order to deliver the Project. This includes the Power Generation Plant Site, Electrical Connection Site, Gas Connection Site and construction

		access/laydown and future maintenance access/laydown areas. The Project Site corresponds to the limits of the draft Development Consent Order (the Order Limits) that will form part of the DCO Application.
Red Line Boundary	Red Line Boundary	The boundary of the Project Site
RRF Order	RRF Order	Means the Rookery South (Resource Recovery Facility) Order 2011, which granted development consent under the PA 2008 for the Covanta RRF Project.
SCGT	Simple Cycle Gas Turbine	Gas plant technology system comprising Gas Turbine(s) fuelled by natural gas. The hot exhaust gases are routed directly to the stack without passing through a secondary steam turbine. The generating technology used for the Power Generation Plant will be SCGT. This can also be referred to as OCGT.
Scoping	Scoping	An exercise undertaken pursuant to Regulation 8 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2009 to determine the topics to be addressed within the Environmental Statement.
Scoping Opinion	Scoping Opinion	The Scoping Opinion for the proposed Project issued by the Secretary of State, dated May 2014 (Appendix 1.2 of the PEIR).
Scoping Report	Scoping Report	The Scoping Report for the proposed Project prepared by the Applicant and dated June 2014. (Appendix 1.2 of the PEIR).
Short Access Road	Short Access Road	The proposed purpose built access road from the Covanta RRF Project to the Generating Equipment Site. This will only be built in isolation if the Covanta RRF Project has constructed its access road.
SoS	Secretary of State	The decision maker for a NSIP application and head of a government department.
stack	stack	The structure by which the exhaust gases and waste heat are emitted to



		the atmosphere. The height of the structure would be between 32.5m-35m and would contain a silencer to reduce noise emissions. The exhaust gases would be subject to emissions control abatement.
Stag	Stag Energy Ltd	An independent UK based company providing expertise and management services to energy development projects. Stag was the original owner of MPL and has been retained by Drax through a management services agreement.
SoCC	Statement of Community Consultation	A document prepared by the Applicant which explains how the Applicant proposes to consult, about the proposed application, people living in the vicinity of the land.
Substation	Substation	400 kV Substation comprising switchgear bays, gantries, emergency power supply, welfare accommodation, cables, fencing, lighting, landscaping, battery rooms, control cubicles and internal site roads.
WPL	Watt Power Limited	WPL is an independent company established to develop flexible gas fired generation assets to support the UK Government drive to a low carbon economy. WPL was the owner of Millbrook Power Limited prior to the acquisition by Drax.



# 1 Introduction

## 1.1 Introduction

1.1.1 Millbrook Power Limited ("MPL") is proposing to develop a gas-fired power generation plant (and connections to the electricity and gas networks) on land located in Rookery South Pit, near the villages of Stewartby, Millbrook and Marston Moretaine in Bedfordshire.

1.1.2 In 2014, MPL consulted on its proposals (as they stood at that time). In March 2015 MPL put "on hold" its plans and notified the public that this was the case. Under the new ownership of the UK energy company Drax Group plc, MPL is now resuming the development consent process for the Project.

1.1.3 The Project would comprise:

- A new Power Generation Plant in the form of an Open Cycle Gas Turbine (OCGT) peaking power generating station, fuelled by natural gas and capable of providing a rated electrical output of up to 299 Megawatts (MW). The Power Generation Plant comprises:
  - Generating equipment including one Gas Turbine Generator with an exhaust gas flue stack and balance of plant, which are located within the Generating Equipment Site (together the "Generating Equipment");
  - A new purpose built access road to the Generating Equipment Site (the "Access Road" or the "Short Access Road");
  - A temporary construction compound required during construction only (the "Laydown Area");
- A new gas connection to bring natural gas to the Generating Equipment from the National Transmission System (NTS) (the "Gas Connection"); and
- A new electrical connection to export power from the Generating Equipment to the National Grid Electricity Transmission System (NETS) (the "Electrical Connection").

1.1.4 The Project is proposed at and in the vicinity of the former clay extraction pit at Rookery South, near Stewartby, Bedfordshire. The boundary of the Project Site falls within both Central Bedfordshire Council (CBC) and Bedford Borough Council (BBC).

1.1.5 A full description of the Project and Project Site can be found in Chapter 3 of the Millbrook Power Project Preliminary Environmental Information Report ("PEIR"), which this document accompanies. The location of the Project Site is shown in Figure 1.1 of the PEIR.

- 1.1.6 More information on the Project can also be found at [www.millbrookpower.co.uk](http://www.millbrookpower.co.uk).
- 1.1.7 The Project is classified as a Nationally Significant Infrastructure Project ("NSIP") under the Planning Act 2008, which means that development consent is required by means of a Development Consent Order ("DCO"). The DCO application for the Project will be submitted to the Secretary of State via the Planning Inspectorate ("PINS") and, once accepted, it will be considered over a six-month examination period by an Examining Authority (made up of Planning Inspectors from PINS) on behalf of the Secretary of State for Business, Energy and Industrial Strategy (the "Secretary of State"). The final decision on the application would be made by the Secretary of State following a recommendation made by the Examining Authority. Consultation with local people, businesses and organisations is an essential part of the DCO process and will help to influence the final design of the Project.
- 1.1.8 MPL anticipates submitting an application for development consent for the Project in Q4 2017. The application would then be examined by an Examining Authority appointed by the Secretary of State over the course of 2018, with a decision from the Secretary of State likely to be issued in mid-2019.

## **1.2 Purpose of the Project Overview Document**

- 1.2.1 The Project Overview Document forms part of a suite of documents provided for statutory consultation on the proposal under Section 42 of the Planning Act 2008; a summary of consultation undertaken to date is provided in Section 2. The documents which this accompanies, and which have also been published as part of this consultation are:
- PEIR; and
  - The PEIR Non-Technical Summary ("PEIR NTS").
- 1.2.2 The purpose of the Project Overview Document is to provide an explanation of the interaction between the Project and the Rookery South Resource Recovery Facility (the "Rookery South RRF Project"), which is another project, promoted by a separate developer, Covanta Rookery South Limited ("Covanta").
- 1.2.3 The document is structured as follows:
- a. a summary of the consultation undertaken to date, and details of the second phase of statutory consultation on the Project, of which this document forms a part (Section 2 of this document);
  - b. an explanation of the interaction between the Project and the Rookery South RRF Project (Section 3 of this document); and

- c. details of the next steps in the Project programme including details of how MPL will continue to address the interrelationship with the Rookery South RRF Project (Section 4 of this document).

### **Planning and Public Consultation**

- 1.2.4 MPL undertook an initial phase of statutory consultation in October/November 2014 which was preceded by a period of informal consultation that commenced in June 2014. Details of this public consultation are provided in Section 2. Section 3.3 provides further details of consultation undertaken with Covanta during this initial phase of public consultation in order to manage the relationship between the Project and the Rookery South RRF Project.
- 1.2.5 Due to the length of time since MPL last consulted on the Project MPL will undertake further statutory consultation on the Project in accordance with the Planning Act 2008 in order to inform key stakeholders and the public of the key changes to the Project that have been made following consideration of the consultation responses from 2014.
- 1.2.6 The second phase of statutory public consultation will begin on 29th May 2017 and will end on 2nd July 2017. This gives a further opportunity to comment on the Project. Further details of the second phase of statutory public consultation are provided in a Statement of Community Consultation ("SoCC") published by MPL which is available to view at [www.millbrookpower.co.uk](http://www.millbrookpower.co.uk).

### **Preliminary Environmental Information Report**

- 1.2.7 A PEIR has been published alongside this document, which provides preliminary environmental information relating to the Project.
- 1.2.8 The Infrastructure Planning (Environmental Impact Assessment) Regulations 2009 (the "EIA Regulations") require an Environmental Impact Assessment ("EIA") to be carried out in respect of any development listed in Schedule 1 to the EIA Regulations ("Schedule 1 development").
- 1.2.9 The Project is a Schedule 1 development as it is a thermal power station with a heat output of 300 MW or more (as listed in Schedule 1, paragraph 2(a) of the EIA Regulations). Therefore, an EIA for the Project is required under the EIA Regulations.
- 1.2.10 The Project falls under the EIA Regulations 2009 regime and not the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the "EIA Regulations 2017") regime. This is because a scoping opinion was requested from the Secretary of State under the EIA Regulations 2009 before the commencement of the EIA Regulations 2017. This means that, in accordance with the transitional arrangements at Regulation 37(2)(a)(ii) of the EIA Regulations 2017, the EIA Regulations 2009 will continue to apply to the Project.

- 1.2.11 Under Regulation 10(b) of the EIA Regulations, the applicant is required to set out how it intends to publicise and consult on preliminary environmental information relating to the Project. Preliminary environmental information is defined by Regulation 2 of the EIA Regulations as the environmental information that has been compiled by the applicant and which is reasonably required to assess the environmental effects of the development.
- 1.2.12 In the case of the Project, information has been compiled into the PEIR which presents the environmental information collected to date and an assessment, on a preliminary basis, of the likely significant environmental effects of the Project. This is the second "PEIR" which has been prepared for the Project; the first was published and consulted upon in 2014 (the "2014 PEIR") together with supporting information and a Non-Technical Summary (the "2014 PEIR NTS"). This information accompanied MPL's initial phase of statutory and non-statutory consultation ("Phase 1 Consultation") with both the local community and prescribed consultees.
- 1.2.13 The feedback received relating to the 2014 PEIR has helped to inform and further refine the EIA process as well as the design and development of the Project. Significant changes which have been made to the Project are set out in more detail at paragraph 2.2.15.
- 1.2.14 As the DCO application for the Project was paused in 2015, MPL is undertaking a further round of statutory consultation accompanied by the second PEIR which contains updated information on the Project, the design parameters, design evolution and the EIA process.

## 2 Consultation

### 2.1 Introduction

- 2.1.1 The Project is a NSIP under the Planning Act 2008. As a result, the consultation process set out in the Planning Act 2008 is being complied with for the Project. This section provides an overview of the consultation undertaken on the Project to date as part of the Phase 1 Consultation and sets out details of the Phase 2 Consultation to be undertaken in 2017.
- 2.1.2 More information on the consultation requirements of the Planning Act 2008 can be found at <https://infrastructure.planninginspectorate.gov.uk/legislation-and-advice/advice-notes/> and an explanation of how MPL is consulting with the public can be found in the SoCC (please see <http://www.millbrookpower.co.uk/> for more details).

### 2.2 Phase 1 Consultation

- 2.2.1 MPL carried out both statutory and non-statutory consultation as part of its work on the first stages of the DCO application process in 2014.
- 2.2.2 MPL focused primarily on non-statutory consultation with the local community within the Core Consultation Zone ("CCZ") and publicised the Project through media coverage across a wider area defined as the Outer Consultation Zone ("OCZ"). MPL defined both the CCZ and the OCZ in consultation with CBC and BBC officers and councillors. The CCZ equates to an approximate 5km radius around the Power Generation Plant site and the OCZ equates to a 10km radius around the Power Generation Plant site. The CCZ is defined by parish council boundaries closest to the 5 km radius. Copies of the CCZ and OCZ area maps are enclosed at **Appendix A** and **Appendix B** respectively.
- 2.2.3 An overview of both statutory and non-statutory elements of the Phase 1 Consultation is provided in the paragraphs below.

#### Phase 1 Non-statutory Consultation

- 2.2.4 MPL chose to engage with the local community, their political representatives and other key stakeholders during an early phase of non-statutory consultation, several months in advance of the commencement of the statutory consultation phase.
- 2.2.5 Stakeholders at the national, regional and local levels as well as local community representatives were contacted by MPL and exhibitions were held for the benefit of the local community. During this non-statutory phase of consultation, MPL explained the rationale and key objectives of the Project, gave reasons why the Power Generation Plant Site had been chosen (and its need) and presented opportunities for feedback on the emerging project concepts.

2.2.6 MPL carried out the following non-statutory consultation activities between April 2014 and June 2014, summarised below:

- Meetings held with CBC and BBC regarding consultation approach and draft SoCC (“2014 SoCC”) (April - October 2014);
- Meetings held with key stakeholders such as local Members of Parliament, English Heritage (now Historic England), Natural England and Parish Councils to introduce the outline proposals and provide an understanding of local and technical issues of the Project (April - October 2014);
- Publishing the initial plans for the Project for people living in the vicinity of the site through a range of media coverage - radio, TV, newspapers, websites and social media (May - June 2014); and
- Holding public exhibitions in Lidlington, Stewartby and Marston Moretaine to gather the local community's feedback on the initial Project plans and its potential impact on the environment, local communities and local economy. The public exhibitions were attended by approximately 250 people (June 2014).

2.2.7 MPL also undertook further consultation on the scope of the EIA ('the EIA Scoping Consultation'). MPL submitted an EIA Scoping Report to PINS in June 2014 and received an EIA Scoping Opinion from PINS in July 2014 which contained the Regulation 9 consultee list; the Secretary of State's and statutory consultees' opinions on the scope; and methodologies and potential effects of the Project to be assessed in the EIA.

### **Phase 1 Statutory Consultation**

2.2.8 Following the non-statutory consultation period, MPL published a draft 2014 SoCC in July 2014 which was developed in consultation with CBC and BBC. The final version of the 2014 SoCC was published on the 23rd September 2014.

2.2.9 The 2014 SoCC set out how the PEIR would be publicised and proposed a single phase of statutory consultation which aligned with s42 and s48 publicity deadlines. MPL sought to maximise the opportunities for consultees to comment on the Project by exceeding the minimum statutory timescales of 28 days.

2.2.10 During the statutory phase of consultation MPL was able to demonstrate the iterative process of project evolution and design development, including how the proposals developed since the early non statutory phase of consultation.

2.2.11 A number of consultation documents were published as part of the 2014 statutory consultation, these are listed below:

- 2014 Scoping Report;



- 2014 SoCC;
- 2014 Consultation Plan;
- 2014 Information leaflet;
- 2014 PEIR;
- 2014 PEIR NTS; and
- 2014 PEIR Technical Appendices.

2.2.12 All of the above documents are available to view on the Millbrook Power website (<http://www.millbrookpower.co.uk/key-documents/>).

2.2.13 MPL undertook a series of consultation activities as part of the Phase 1 Statutory Consultation as summarised below:

- s47 PA 2008- Statutory consultation with BBC and CBC on the content of the 2014 SoCC (July-August 2014);
- s47 PA 2008- 2014 SoCC published online (MPL website) and hard copies made available for public viewing in local Council offices and libraries within the CCZ and OZC. The 2014 SoCC set out how MPL will consult the local community living in the vicinity of the Project and how they can comment on the proposals (September 2014);
- s48 PA 2008 - Notice publicising the Project in national newspaper to publicise the intention to submit a DCO Application (October 2014);
- s46 PA 2008- SoS notified of the proposed DCO Application and supplied with all consultation information (October 2014);
- s42 PA 2008- MPL supplied statutory consultees (including prescribed persons, local authorities and those with land interests) with consultation materials and undertook consultation for a period of 35 days (October-November 2014);
- s48 PA 2008- Publicised the intention to submit a DCO application for the project through a range of media coverage- Radio, TV, Newspapers, websites and social media (September – October 2014);
- s47 PA 2008 - Hard copies of the 2014 PEIR, the 2014 PEIR NTS and 2014 information leaflet made available for public viewing over the 35-day consultation period at local Council offices and libraries in the CCZ and OZC; and
- s47 PA 2008 - Public exhibitions held in Marston Moretaine, Stewartby, Amptill and Lidlington to gather the local community's feedback on the

PEIR, the Project and its impact on the environment, local communities and local economy (October - November 2014).

2.2.14 Following the close of the statutory consultation period, MPL undertook additional non-statutory consultation activities. This involved follow up meetings with various statutory consultees, a Project update meeting with PINS, a Project update meeting with the EA and a meeting with CBC, BBC and local parishes. MPL also issued two information updates to the parties covered by section 42 of the Planning Act 2008 as well as members of the public who requested to be kept informed. The first update explained how MPL had made some changes to the Project as a result of statutory consultation and the second update reported on the slight amendment to the red line boundary.

2.2.15 MPL had regard to all feedback received during the Phase 1 Statutory Consultation and as a result several significant changes to the Project have now been made, including:

- undergrounding of the electrical connection to the National Grid (thereby avoiding the need for overhead transmission lines and additional transmission towers);
- reduction in the number of turbines used to generate electricity from a maximum of 5 units to only one unit resulting in only one stack;
- reduction in the maximum height of the stacks;
- re-arrangement of generating equipment in order to reduce the potential impact of noise on nearby homes;
- re-location of the gas connection site to reduce the potential impact on agricultural land; and
- improvement of access arrangements, traffic management measures and routing during construction to minimise potential impact on the road network.

2.2.16 Additionally, MPL has undertaken detailed technical and environmental studies, and associated design work to refine the design of the plant.

### **2.3 Phase 2 Consultation**

2.3.1 A second phase of statutory public consultation is planned to begin on 29th May 2017 and end on 2nd July 2017. This gives a further opportunity to comment on the Project.

2.3.2 MPL is again liaising closely with CBC and BBC. It is also engaging with the Parish Councils in the area as well as organisations such as the Environment Agency, Natural England and Historic England, to ensure that the Project is



designed, built, operated and maintained to the highest safety and environmental standards.

2.3.3 Over the Phase 2 consultation period, MPL will publish a number of documents providing updated information about the Project parameters and design evolution. A brief overview of the content of each report is summarised below:

- This Project Overview Document;
- SoCC - explains how MPL proposes to consult with residents, businesses and other organisations in the vicinity of the Project;
- Consultation Plan – provides an overview of the Project, the 2014 non-statutory and statutory consultation and explains in detail how MPL intends to consult with residents, businesses and other organisations in the vicinity of the Project;
- Information leaflet – provides background on the Project, the consultation process and explains how individuals can engage in the Phase 2 Consultation;
- PEIR - provide updates on Project parameters and design evolution and the updated EIA processes;
- PEIR NTS – provides a NTS of the PEIR; and
- PEIR Technical Appendices – contains the technical appendices to the PEIR.

2.3.4 The Phase 2 Statutory Consultation is scheduled to take place between 29th May 2017 and 2nd July 2017 and therefore MPL welcomes views on the Project on or before 5.00pm on 2nd July 2017. In particular, responses are invited on:

- The Project, as currently proposed, including changes since the 2014 consultation;
- The layout of the Power Generation Plant within the Project Site;
- The interaction with the Rookery South RRF Project and proposed amendments to the RRF Order; and
- The findings of the preliminary assessment on the likely significant environmental effects of the Project during construction and operation, as set out in the PEIR.

2.3.5 The SoCC provides further details of the consultation activities which MPL will undertake as part of the Phase 2 Consultation and explains the ways in which

comments can be submitted to MPL (please see  
<http://www.millbrookpower.co.uk/> for more details).

## **3 The Rookery South (Resource Recovery Facility) Order 2011**

### **3.1 Introduction**

- 3.1.1 The "Rookery South RRF Project" is a separate project promoted by Covanta, which is also planned for construction in Rookery South Pit. The Rookery South RRF Project was granted a DCO in 2011 (the "RRF Order").
- 3.1.2 The Project sits within part of the Order limits (i.e. the redline boundary) of the RRF Order. This means that there would be an overlap between the RRF Order and any DCO that is made by the Secretary of State for the Project.
- 3.1.3 MPL has engaged with Covanta throughout the development of the Project and is developing its DCO application for the Project in such a way as to allow both schemes to co-exist successfully. To do this, MPL intends to submit a draft DCO (the 'MPL Draft Order') which would amend the existing RRF Order. The amendments would insert protective provisions into the RRF Order for the benefit of MPL and further protective provisions into the MPL Draft Order for the Project to protect Covanta. The purpose of these provisions is to ensure that both projects can proceed without conflict and to ensure that the parties co-operate to ensure the best outcome.
- 3.1.4 The purpose of this section of the report is to summarise the interrelationship between the Project and the Rookery South RRF Project, and to explain briefly the approach to the provisions that MPL proposes to include in the MPL Draft Order to ensure that both schemes can co-exist successfully.

### **3.2 Rookery South RRF Project Background**

- 3.2.1 The RRF Order permits the construction of an Energy Recovery Facility at Rookery South Pit that will be capable of using municipal, commercial and non-hazardous industrial residual waste, left after recycling and composting efforts, as fuel to generate over 50MWe of heat and electricity.
- 3.2.2 During early meetings regarding the Project, both CBC and BBC noted the existence of the Rookery South RRF Project and advised that the consultation zones for the Project should be broadly of a similar size to those of the Rookery South RRF Project. It was also recognised by MPL, from the outset, that because of their close proximity, both physically and in terms of their likely construction programmes, the interaction between the two schemes would need to be dealt with transparently and openly during both non-statutory and statutory consultation phases.

### **3.3 Consultation with Covanta**

- 3.3.1 MPL first carried out non-statutory public consultation relating to the Project in May 2014 and June 2014 and statutory consultation in October 2014 and

November 2014 as part of the Phase 1 Consultation. The following paragraphs set out how and where the interaction between the two schemes was reported, and gives details of feedback received relevant to that issue. They also explain the further relevant consultation undertaken by MPL following the conclusion of the statutory consultation.

### **Phase 1 Non-statutory Consultation**

- 3.3.2 Early non-statutory consultation occurred in May and June 2014. In recognition of the need for clarity as expressed above, MPL representatives at all exhibitions ensured that when discussing the Project with attendees, they made it clear that there was a possibility that (subject to consent) both the Rookery South RRF Project and the Project could both be implemented and operate at the same or similar times. Subsequent feedback from the consultation exercise showed that this possibility was of concern to residents.
- 3.3.3 In particular, in response to the consultation question: “Is there anything you would like to see done differently at the next round of exhibitions?”, consultees expressed concern about the “Relationship with Covanta and creep of subsequent growth” (which MPL interpreted as concern about cumulative impact); and made requests to “keep [consultees] informed over future proposals on the old Covanta project”.
- 3.3.4 In response to the above remarks, additional consultation material was prepared for the statutory phase of consultation.

### **Phase 1 Statutory Consultation**

- 3.3.5 Further to the concerns expressed by respondents to the non-statutory consultation, briefing materials at the formal consultation (section 47) exhibitions sought to make clear that an overlap had been identified between the boundaries of both the Project and the Rookery South RRF Project, and that both could be implemented and operational at the same time if the Project was granted Development Consent. The issue of the cumulative impact of both projects being brought forward was dealt with in the text of the explanatory exhibition boards that were presented at the exhibitions.
- 3.3.6 The 2014 PEIR, which formed part of the statutory consultation materials, sought to explain the relationship between the Project and the Rookery South RRF Project at section 2: 'Project and Site Description' (para 2.2.4 and paras 2.3.22 - 2.3.25), with cumulative impact with the Rookery South RRF Project also being addressed at section 4: 'Environmental Impact Assessment Methodology' (paras 4.7.5 - 4.7.7) and then within the topic-specific chapters of the 2014 PEIR. This document is available online at ([www.millbrookpower.co.uk](http://www.millbrookpower.co.uk)).
- 3.3.7 Covanta responded specifically to the section 42 consultation on the 10th November 2014 and indicated its willingness to discuss protective provisions that might govern the interaction between both projects. Other comments were

received from consultees demonstrating knowledge of the relationship between the two projects and commenting upon it. These included:

- English Heritage (now Historic England) commenting that the Project was modest in comparison with the Rookery South RRF Project but that the accumulation of impacts was potentially significant;
- Four additional comments to the effect that the Rookery South RRF Project has already been permitted and that the Project would add to the cumulative impact in the area; and
- A comment stating that if choice were available then the MPL Project would be preferred.

### **Phase 1 Non-Statutory Consultation Activities - Post Statutory Consultation**

3.3.8 Non-statutory consultation has continued since the Phase 1 statutory consultation phase. A number of meetings were held with stakeholders including an outreach meeting at the Marston Vale Forest Centre on the 26th November 2014. At that meeting it was agreed not to use background data from the Rookery South RRF Project application, which was considered to be out of date.

3.3.9 MPL also issued two information updates to the local community and prescribed consultees, which explained the principal changes made to the Project since statutory consultation. The second information update issued in March 2015 dealt specifically with an amendment to the Project's application boundary, this amendment was made in order to ensure that both the MPL Project and the Rookery South RRF Project could co-exist in Rookery South Pit. Additionally, the information update informed consultees of amendments to the RRF Order that MPL proposes to make, details of which are set out in the following section.

## **3.4 Management of the relationship with the Rookery South RRF Project**

3.4.1 As indicated in the introduction to this section, in order to manage the relationship between the two projects, MPL is proposing to include two sets of protective provisions within the MPL Draft Order that will be submitted as part its DCO application.

3.4.2 The first set of provisions would be for the benefit of the Rookery South RRF Project. These provisions would ensure that MPL consults Covanta before submitting certain design details (for example, details relating to the access road into the Rookery South Pit), or before exercising certain powers under the MPL Draft Order for the Project (for example, powers to access land for undertaking street works) where this relates to the land on which Covanta has consent to construct the Rookery South RRF Project.

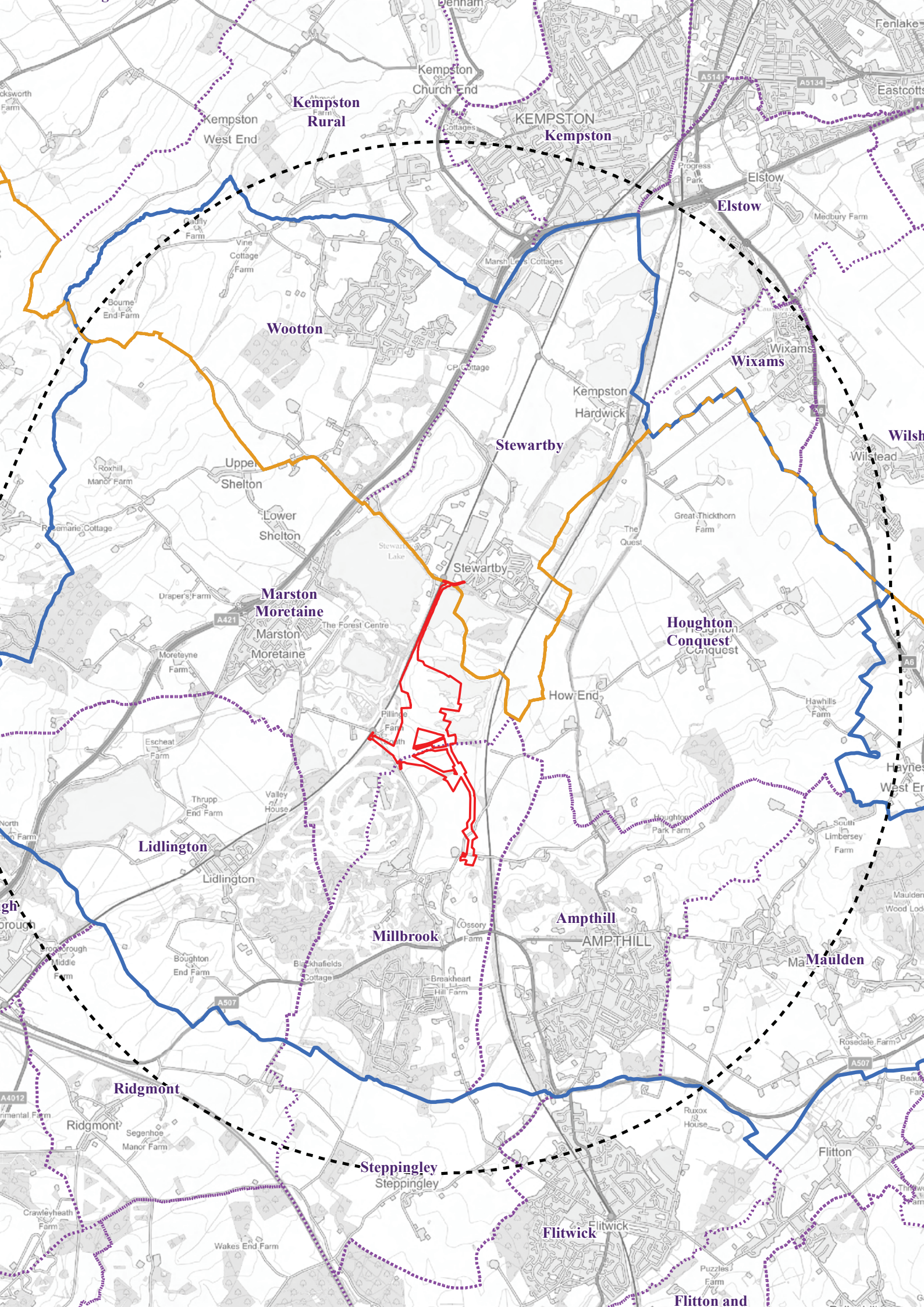
- 3.4.3 This set of provisions would also ensure that MPL and Covanta work together on landscaping and ecological mitigation works within the redline boundary of the Project, so as to ensure that the mitigation schemes for both projects will be compatible and, indeed, will also require MPL and Covanta to work co-operatively to co-ordinate construction programmes and to try to avoid conflicts between the construction of the two schemes to the extent that construction happens at the same time. The drafting of these provisions has been discussed directly with Covanta and will continue to be negotiated following submission, as is the case with the other sets of protective provisions that are for the benefit of statutory undertakers.
- 3.4.4 The second set of protective provisions would be inserted into the RRF Order in the event that the MPL Draft Order for the Project is made by the Secretary of State. These protective provisions would protect MPL where Covanta wishes to exercise its powers under the RRF Order over the land that is also contained within the MPL Order limits. This protection would particularly relate to the exercise of the powers in the RRF Order allowing access to land for various reasons, including for street works, restricting the use of public rights of way, for survey works and for felling or lopping trees. This wording would also require MPL and Covanta to work co-operatively to co-ordinate construction programmes and to try to avoid conflicts between the carrying out of the two schemes to the extent that this happens at the same time. Again, this drafting has been discussed directly with Covanta and will continue to be negotiated following submission, as is the case with the other sets of protective provisions which are for the benefit of other statutory undertakers.
- 3.4.5 In addition to drafting the above protective provisions, MPL has also made certain minor changes to its own Project since 2015 to better enable both projects to co-exist and has also engaged with Covanta as the promoter of the Rookery South RRF Project, O&H as the landowner and the two local authorities (CBC and BBC). The local community and prescribed consultees' views on how MPL has sought to manage this relationship are welcomed as part of Phase 2 Consultation.
- 3.4.6 It is noted that since the RRF Order was granted, Covanta, the original promoter of the Rookery South RRF Project, has entered into a Project Development Agreement with Veolia to develop the Rookery South RRF pursuant to the RRF Order. On 12th May 2016 Veolia issued a press release stating that construction is anticipated to commence "by late 2017 with the facility becoming operational in 2020". Managing the relationship between the two projects therefore remains of considerable practical importance.

## 4 Next Steps

- 4.1.1 The Phase 2 Statutory Consultation is scheduled to take place between 29th May 2017 and 2nd July 2017 and therefore, MPL welcome views from all parties on the Project on or before 5.00pm on 2nd July 2017. The SoCC provides further details of the Phase 2 Statutory Consultation and explains the ways in which comments can be submitted to MPL (see <http://www.millbrookpower.co.uk/> for more details).
- 4.1.2 Following the Phase 2 Statutory Consultation MPL will have regard to all consultation responses received in taking forward the detailed technical and environmental assessment, and associated design work, in order to refine the design of the plant and progress the Project in preparation of the DCO application.
- 4.1.3 MPL will continue to engage with CBC, BBC, and Parish Councils as well as statutory consultees (such as the Environment Agency, Natural England and Historic England) on the development of the Project, and to ensure that the Project is designed, built, operated and maintained to the highest relevant and current safety and environmental standards.
- 4.1.4 MPL will also continue to engage with Covanta in order to develop the Project in a way which will allow both schemes to successfully coexist.
- 4.1.5 MPL anticipates submitting an application for development consent for the Project in Q4 2017 with the intention of the application being examined by PINS during 2018, to enable a decision from the Secretary of State by mid-2019.

# Appendix A CCZ map





**Kempston Rural**

**KEMPSTON**

**Elstow**

**Wootton**

**Wixams**

**Stewartby**

**Wils**

**Marston Moretaine**

**Houghton Conquest**

**Lidlington**

**Millbrook**

**Ampt Hill**

**MaMaulden**

**Ridgmont**

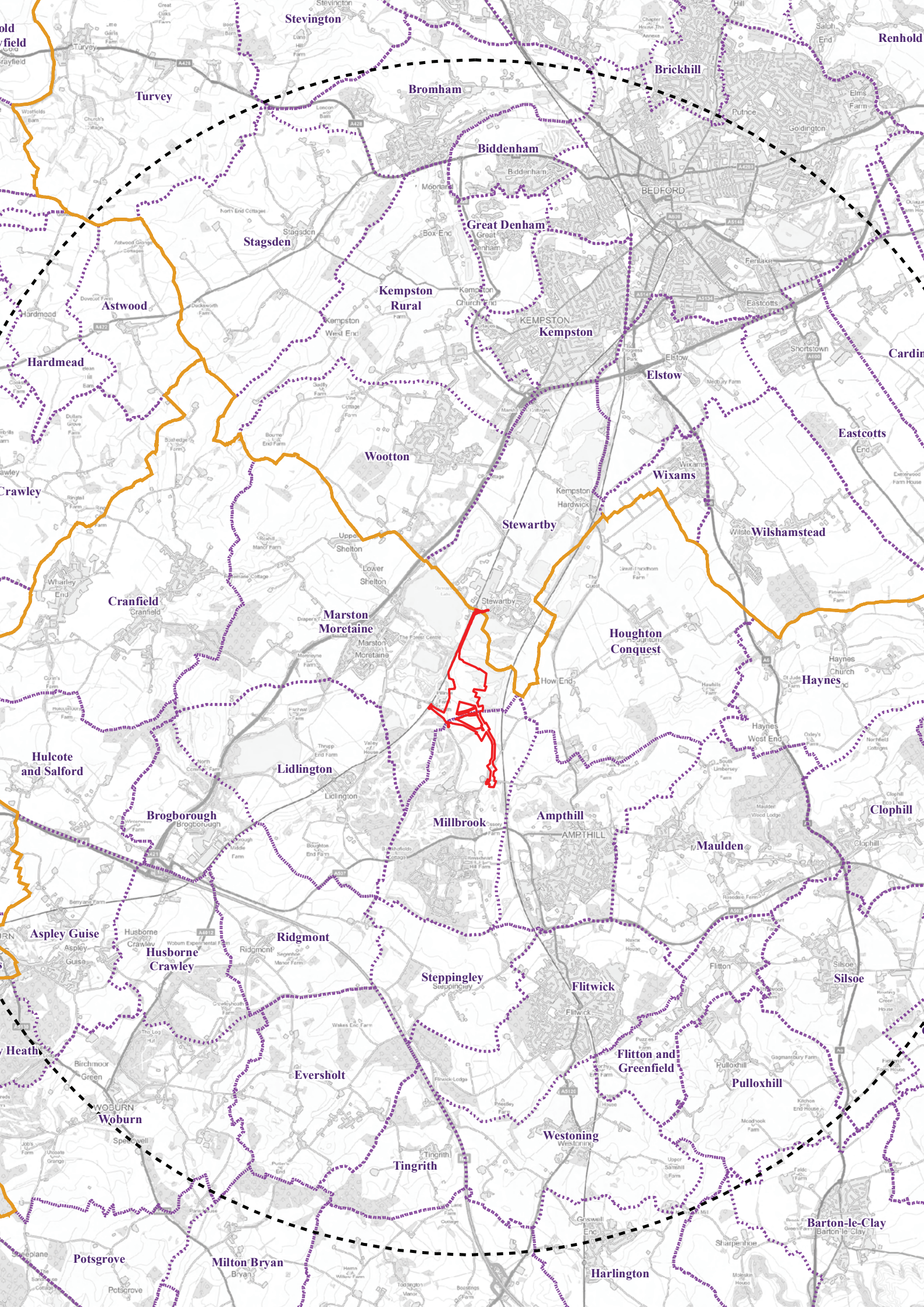
**Steppingley**

**Flitwick**

**Flitton and**

**Appendix B    OCZ map**





Stevington

Renhold

Turvey

Bromham

Brickhill

Biddenham

Stagsden

Great Denham

Astwood

Kempston Rural

Kempston

Hardmead

Elstow

Cardin

Eastcotts

Wootton

Wixams

Stewartby

Wilshamstead

Cranfield

Marston Moretaine

Houghton Conquest

Haynes

Hulcote and Salford

Lidlington

Millbrook

Amphill

Mauden

Clophill

Aspley Guise

Husborne Crawley

Ridgmont

Steppingley

Flitwick

Silsoe

Heath

Eversholt

Flitton and Greenfield

Pulloxhill

Woburn

Tingrith

Westoning

Potsgrove

Milton Bryan

Harlington

Barton-le-Clay



**FW: URGENT: Millbrook Power Limited: Proposed gas fired power plant at Rookery South Pit, Nr Millbrook, Bedfordshire**

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To: Redundant Pipelines &lt;LPDA@fisherman.co.uk>

Kind Regards,

Redundant Pipelines &lt; Land Powers Defence Act 1958

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From: Grace Buckley [mailto:Grace.Buckley@oilandpipelines.com]

Sent: 26 May 2017 11:41

To: Redundant Pipelines &lt; Land Powers Defence Act 1958 &lt;LPDA@fisherman.co.uk>

Subject: RE: URGENT: Millbrook Power Limited: Proposed gas fired power plant at Rookery South Pit, Nr Millbrook, Bedfordshire

Good morning,

I hope these are better for you.

Kind regards

Grace Buckley  
OPA Secretariat

d:

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m:

07802 655947

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grace.buckley@oilandpipelines.com

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To: LPDA@fishergerman.co.uk

From: Emma Pattison [mailto:Emma.Pattison@fishergerman.co.uk]  
On Behalf Of Redundant Pipelines â€œ Land Powers Defence Act 1958  
Sent: 26 May 2017 10:01  
To: Grace Buckley &lt;Grace.Buckley@oilandpipelines.com>;  
Subject: RE: URGENT: Millbrook Power Limited: Proposed gas fired power plant at Rookery South Pit, Nr Millbrook, Bedfordshire

Hi Grace

Thank you for the email, please could you resend the attachments to this email as they have corrupted.

Many thanks

Kind Regards,

Redundant Pipelines â€œ Land Powers Defence Act 1958

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From: Grace Buckley [mailto:Grace.Buckley@oilandpipelines.com]  
Sent: 25 May 2017 12:34  
To: Redundant Pipelines â€œ Land Powers Defence Act 1958 &lt;LPDA@fishergerman.co.uk>;  
Subject: URGENT: Millbrook Power Limited: Proposed gas fired power plant at Rookery South Pit, Nr Millbrook, Bedfordshire  
Importance: High

Good afternoon,

Statutory consultation under Section 42 of the Planning Act 2008

Please see attached letters from Peter Brett Associates regarding Millbrook Power Limited its proposal for a gas fired power plant at Rookery South Pit, Nr Millbrook, Bedfordshire.

I have also received the following documents in the post:

Â·  
Preliminary Environmental Information Report â€œ Non-Technical Summary  
Â·  
Project Overview Document  
Â·  
CD-ROM

Can you confirm where I should send copies of these documents to and also state whether this is a matter for the OPA.

=?utf-8?B?UmVkdW5kYW50IFBpcGVsaW5lcyDigJMgTGFuZCBQb3dlcnMgRGVmZW5jZSBB?=@?utf-8?Q?Created: 05/06/2016 10:06:13 AM  
To: [redacted]@bpa.gov.uk  
From: [redacted]@bpa.gov.uk

I look forward to hearing from you.

Kind regards

Grace Buckley  
OPA Secretariat

d:  
020 7420 1695  
m:  
07802 655947  
e:  
[grace.buckley@oilandpipelines.com](mailto:grace.buckley@oilandpipelines.com)

Aviation House, 1st Floor, Zone A, 125 Kingsway, London WC2B 6NH

t:  
020 7420 1670  
w: <http://www.gov.uk/opa>

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**FW: URGENT: Millbrook Power Limited: Proposed gas fired power plant at Rookery South Pit, Nr Millbrook, Bedfordshire**

=?utf-8?B?UmVkdW5kYW50IFBpcGVsaW5lcyDigJMgTGFuZCBQb3dlcnMgRGVmZW5jZSBB?=?utf-8?Q@ated:19805/06PDA7@f3.06german

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Your ref:

Our ref: MPL/S42

22 May 2017

Oil and Pipelines Agency  
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London  
WC2B 6NH

Peter Brett Associates LLP  
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EC1R 0BJ  
T: +44 20 3824 6600  
E: London@peterbrett.com

Dear Sir / Madam

**Millbrook Power Limited: Proposed gas fired power plant at Rookery South Pit, Nr. Millbrook, Bedfordshire**

**Statutory consultation under Section 42 of the Planning Act 2008**

Peter Brett Associates ("PBA") acts for Millbrook Power Limited ("MPL").

MPL is proposing to submit an application under the Planning Act 2008 in Q4 2017 for an up to 299 megawatt (MW) Power Generation Plant and underground connections to the existing nearby electricity and gas networks (the "Project").

Pursuant to section 42 of the Planning Act 2008, MPL must consult with a variety of people and organisations about its proposed application for the Project. The people and organisations whom MPL is required to consult under section 42 include: certain prescribed bodies (such as the Environment Agency and Natural England); local authorities within or near to the Project site; and those with an interest in the land to which the application for the Project relates (such as land owners, tenants, occupiers and those having the benefit of certain rights over the land) or those who may be able to bring a claim under certain land compensation legislation for the construction or use of the Project.

You have been identified as a person whom MPL believes it needs to consult under section 42 of the Planning Act 2008. As such, you will find the following information enclosed with this letter:

1. A paper copy of a Preliminary Environmental Information Report Non-Technical Summary ("PEIR NTS"). The PEIR NTS is a non-technical summary of the Preliminary Environmental Information Report ("PEIR") described in part 4 of this letter.
2. A CD containing a full electronic copy of the PEIR. The PEIR sets out details of the Project and its potential likely significant environmental effects and these are summarised in the enclosed PEIR NTS. PEIR Figure 1.2 shows the location of Project.

From 29<sup>th</sup> May 2017 the full PEIR will also be available to view and download from the Project website ([www.millbrookpower.co.uk](http://www.millbrookpower.co.uk)). A hard copy of the PEIR (with an electronic





copy of the PEIR Technical Appendices) will be available for inspection at the venues set out in part 6 of this letter.

3. A paper copy and electronic copy (on the enclosed CD) of a Project Overview Document. This document provides: an overview of the Project and explains progress made to date, including an overview of the Phase 1 Consultation; an explanation of the interrelationship between the Project and the Rookery South Resource Recovery Facility (the "Rookery South RRF Project"), promoted by a separate developer (Covanta Rookery South Limited), which is also planned for construction in Rookery South Pit; and a summary of the next steps in the Project programme.
4. A paper copy of the consultation leaflet which MPL has distributed to the local community as part of the consultation undertaken under section 47 of the Planning Act 2008 (if you live near the Project site, you may have already received this leaflet in the post). The leaflet provides a high level overview of the Project as well as describing the community consultation on the Project which is taking place.

The remainder of this letter provides an overview of: the Project; MPL; the need for the Power Generation Plant; the planning regime under the Planning Act 2008; and how you can respond to this consultation.

MPL welcomes your comments on the Project. Part 7 of this letter contains describes how you can respond to this consultation. Note that the consultation period on the Project will run from 29th May until 2nd July 2017 (inclusive), and we would therefore welcome your views on the Project on or before 5.00pm on 2nd July 2017.

Following the end of the consultation period and receipt of consultee responses, MPL will have regard to the comments received when finalising the application for submission under the Planning Act 2008.

## **1 Introduction to the Project**

MPL proposes to develop a Power Generation Plant in the Rookery South Pit, near the villages of Stewartby, Millbrook, Lidlington and Marston Moretaine in Bedfordshire.

The Power Generation Plant will be capable of generating up to 299 MW of electricity, enough to power the equivalent of 150,000 homes. Using the latest and most efficient power generating technology, it will burn natural gas to generate electricity that is delivered into the National Grid. The Project is intended to provide back-up power to the National Grid and support the UK Government's drive to a low carbon economy. More information on the Project can be found at <http://www.millbrookpower.co.uk/>. The Project could enter commercial operation in 2022 subject to the outcome of the public consultation exercise, receipt of planning consent and financing.

The Project was initially developed and taken through the first stages of a Development Consent Order ("DCO") planning application process in 2014 and MPL undertook a first phase of statutory consultation on the Project between 13th October 2014 and 16th November 2014 ("Phase 1 Statutory Consultation"). However, in March 2015, the Project was put on hold due to market and political uncertainty. There remains a need for new gas-fired power stations to be built in this country, and acknowledging this, the MPL project was recently acquired by the UK energy company, Drax Group plc ("Drax").

Under Drax's stewardship, it is MPL's intention to submit an application for a DCO to the Planning Inspectorate ("PINS") in Q4 2017. MPL is undertaking further statutory consultation ("Phase 2 Statutory Consultation") accompanied by the 2017 PEIR (CD copy enclosed) which contains updated information on the Project, the design parameters, design evolution and the EIA process.



## 1.1 The Applicant

Drax acquired MPL from Watt Power Limited which established MPL to develop the Project at Rookery South Pit in Bedfordshire. Drax is seeking to develop gas-fired power stations at Millbrook

and elsewhere in the UK to support the Government's drive to a low carbon economy by plugging the gaps created by intermittent renewables. For more information, refer to Section 1.3 of the enclosed PEIR NTS.

## 1.2 Development Consent Order

The Project will require a DCO under the Planning Act 2008. This is because the capacity of the power plant will be more than 50 MW and it therefore falls within the definition of a Nationally Significant Infrastructure Project ("NSIP") under Section 15 of the Planning Act 2008. Development consent for a NSIP (which can include consent for associated development that the NSIP may require) may only be granted by a DCO. The DCO will permit the construction, operation and maintenance of the Project.

The decision-maker for any DCO application is the Secretary of State for Business, Energy and Industrial Strategy ("Secretary of State") rather than the Local Planning Authority. DCO applications are therefore submitted to the Secretary of State via PINS. Once accepted, an application will be considered over a six-month examination period by an Examining Authority (comprising Planning Inspectors from PINS) on behalf of the Secretary of State. The Examining Authority will process and examine the application before making a recommendation to the Secretary of State as to whether or not an application should be granted development consent. Therefore, the final decision on an application is made by the Secretary of State.

MPL anticipates submitting the DCO application for the Project in Q4 2017. The application would then be examined over the course of 2018, with a decision from the Secretary of State likely to be issued in mid-2019.

## 2 The Project

The Project consists of three main elements:

- A. A new Power Generation Plant in the form of an Open Cycle Gas Turbine (OCGT) peaking power generating station, fuelled by natural gas with a rated electrical output of between 50 and 299 MW. This is the output of the generating station as a whole, measured at the point of export into the National Grid Electricity Transmission System (NETS). The Power Generation Plant comprises:
  - generating equipment including one Gas Turbine Generator with one exhaust gas flue stack and Balance of Plant (together referred to as the 'Generating Equipment'), which are located within the 'Generating Equipment Site';
  - a new purpose built access road to the Generating Equipment Site (the 'Access Road');
  - a temporary construction compound required during construction only (the 'Laydown Area');
- B. A new underground gas pipeline connection to bring natural gas to the Generating Equipment from the National Transmission System ("NTS") (the "Gas Connection"). This element incorporates an Above Ground Installation ("AGI") at the point of connection to the NTS. Further details of the Gas Connection are provided in Section 2.4 of the enclosed PEIR NTS; and



- C. A new electrical connection to export power from the Generating Equipment to the NETS (the "Electrical Connection"). This element could be delivered in one of two ways although both options comprise underground cables and one replacement transmission tower. Further details of both Electrical Connection options are provided in Section 5 of this letter and Section 2.5 of the enclosed PEIR NTS. The Electrical Connection covers an area of approximately 4.8ha no matter which option is used.

### **3 The Need for Gas Generation**

The Government's policy in relation to NSIPs is set out in a series of National Policy Statements ("NPSs"). The Project has been developed with regard to the relevant Energy NPSs, in particular EN-1 (Energy), EN-2 (Fossil Fuel Electricity Generating Infrastructure), EN-4 (Gas Supply Infrastructure and Gas and Oil Pipelines) and EN-5 (Electricity Networks Infrastructure).

NPS EN-1 (paragraph 3.6.2) states that "Gas will continue to play an important role in the electricity sector – providing vital flexibility to support an increasing amount of low-carbon generation and to maintain security of supply".

Gas is a reliable fuel source. As noted above, it is acknowledged by the Government as being essential to a low-carbon economy and to underpin the country's energy security. In addition, gas provides back-up to power generation from renewable sources, particularly wind power – which is an increasingly prevalent but intermittent form of energy. The proposed power plant will be designed to operate flexibly (i.e. not "always on") so that it can respond quickly and efficiently to short-term variations in customer demand and intermittent output from onshore and offshore wind power.

The need for the Project is established through the NPSs set out above and is therefore not proposed as a topic for this consultation. PEIR NTS Section 1.4 "Need for the Project" provides further discussion about the need for gas generation projects.

### **4 Environmental Information**

Due to the nature and size of the Project, MPL is required under the Infrastructure Planning (Environmental Impact Assessment) Regulations 2009 (the '2009 EIA Regulations') to undertake an Environmental Impact Assessment (EIA).

The EIA will consider the likely significant environmental effects, both positive and negative, of the Project relating to matters including air and water quality, noise, landscape and visual impact, traffic, local ecology, archaeology and heritage, and socio-economics. An Environmental Statement ("ES") will be submitted with the DCO application.

The Project falls under the 2009 EIA Regulations regime and not the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (2017 EIA Regulations) regime. This is because a scoping opinion was requested from the Secretary of State under the 2009 EIA Regulations before the commencement of the 2017 EIA Regulations. This means that, in accordance with the transitional arrangements at Regulation 37 of the 2017 EIA Regulations, the 2009 EIA Regulations will continue to apply to the Project.

In accordance with Regulation 10 of the 2009 EIA Regulations, MPL has prepared the PEIR which presents the environmental information gathered to date and provides the results of a preliminary assessment of the likely significant environmental effects of the construction, operation and decommissioning of the Project. This includes the cumulative effects of the Project together with relevant proposed but not yet implemented projects including the Rookery South RRF Project. The Rookery South RRF Project was granted a DCO in 2011 (the "RRF Order"). The PEIR also



includes a preliminary assessment of the residual effects of the Project once proposed mitigation measures have been taken into account.

The PEIR does not set out the final findings but does include information on the preliminary mitigation measures proposed. For information on the preliminary assessment of the likely significant environmental effects of the Project, the relevant sections of the enclosed PEIR NTS are as follows:

- 3.2 Air Quality
- 3.3 Noise and Vibration
- 3.4 Ecology
- 3.5 Water Quality and Resources
- 3.6 Ground Conditions
- 3.7 Landscape and Visual Impact
- 3.8 Traffic and Transport
- 3.9 Historic Environment
- 3.10 Socio-Economics
- 3.11 Other Topics Considered

## **5 Options for the Proposed Project**

The design that will form the basis of the application in Q4 of 2017 will not be a final, detailed design but one developed using the "Rochdale Envelope" approach within which the Project can be constructed. A series of design parameters has been incorporated into the Project to provide MPL with sufficient flexibility to construct and operate an electricity generating plant of up to 299 MW by building one Gas Turbine Generator with its own dedicated flue stack, which could be procured from a range of suppliers.

The application is therefore being prepared with reference to PINS Advice Note 9 (AN9) – 'Using the Rochdale Envelope'. Further details are provided in Section 3.1 of the enclosed PEIR. Advice Note 9 can be accessed via the PINS website at: <http://infrastructure.planningportal.gov.uk>.

PEIR Figure 1.2 shows the Project Site and all elements of the Project including the Generating Equipment Site, Electrical Connection Site, Gas Connection Site and Power Generation Plant Site.

### **5.1 Power Generation Plant**

The site for the Power Generation Plant is located within Rookery South Pit and covers an area of approximately 4 ha. PEIR Figure 1.2 shows the location of the Power Generation Plant Site although the final location and layout are yet to be determined. The precise position and alignment of the Power Generation Plant will be finalised after this consultation has closed, having regard to the responses received and the further environmental and technical studies being undertaken. Your views on the indicative location of the Power Generation Plant would be welcome.

### **5.2 Gas Connection**

The Gas Connection would comprise all the necessary elements to enable gas to be imported to the Generating Equipment at a suitable rate and pressure to produce up to 299 MW. The proposed route for the Gas Connection is shown in the PEIR Figure 1.2 of the PEIR and described in Section 2.4 of the PEIR NTS. PEIR Figure 12.2 shows the two options for accessing the Gas Connection. As such, your views on the preferred Gas Connection access would be welcome.





### **5.3 Electrical Connection**

The Electrical Connection would comprise all the necessary elements to enable power to be exported from the Generating Equipment to the NETS. There are two connection options which both use underground cables to connect the Substation to the existing 400 kV overhead line. Figures 3.1a and 3.1b in the PEIR show an indicative illustration of the position and layout of the Generating Equipment with Electrical Connection options 1 and 2 respectively, both of which include underground cables and no additional transmission towers (pylons). Your comments on the proposed Electrical Connection options would be welcome.

### **5.4 Compulsory Acquisition Rights**

At this stage of the Project's development, MPL notes that the DCO application may seek the compulsory acquisition ("CA") of land and rights over land (including rights to use land) for the Project together with temporary possession of land during the construction and commissioning periods. MPL is commencing and/or continuing discussions with those persons who may be affected and is keen to reach agreement, where possible, with those persons prior to submission of the DCO application.

### **5.5. The Rookery South RRF Project**

The Rookery South RRF Project is another project, promoted by a separate developer, Covanta Rookery South Limited ("Covanta"), which is also planned for construction in Rookery South Pit. The Rookery South RRF Project was granted a DCO in 2011 (the "RRF Order").

The Project sits within part of the application boundary for the RRF Order. This means that there would be an overlap between the RRF Order and any DCO that is made by the Secretary of State for the Project. MPL has engaged with Covanta through the development of the Project and is developing its DCO application for the Project to allow both schemes to successfully coexist. As part of this process, MPL intends to submit a draft DCO that would amend the RRF Order. MPL's PEIR takes full account of the Rookery South RRF Project as part of its assessment of potential cumulative environmental effects. The Project Overview document provides further details of the Rookery South RRF Project and explains how MPL intends to address the interrelationship between the two Projects.

## **6 Consultation**

Consultation with local people, businesses, and organisations is a key part of the DCO process and will help to influence the final design of the Project. MPL undertook both statutory and non-statutory consultation on the Project in 2014 as part of the Phase 1 Consultation. Further details of the Phase 1 Consultation undertaken with statutory consultees and the local community can be found in Section 2 of the enclosed Project Overview document. MPL has had regard to all feedback received during this consultation and as a result several significant changes to the Project have now been made, including:

- undergrounding of the electrical connection to the National Grid (thereby avoiding the need for overhead transmission lines and additional transmission towers);
- reduction in the number of turbines used to generate electricity from a maximum of 5 units to only one unit resulting in only one stack;
- reduction in the maximum height of the stacks;



- re-arrangement of generating equipment in order to reduce the impact of noise on nearby homes;
- re-location of the gas connection site to reduce impact on agricultural land; and
- improvement of access arrangements, traffic management measures and routing during construction to minimise impact on the road network.

As described above, the Project design has evolved significantly since the Phase 1 Consultation was undertaken in 2014. Due to the length of time since MPL last consulted on the Project, as well as to inform stakeholders and the public of the principal changes to the Project that have been made following consideration of the consultation responses from 2014, MPL is now undertaking a further round of statutory consultation ("Phase 2 Consultation").

The information within the enclosed PEIR contains updated information on the Project, the design parameters, design evolution and the EIA process. We wish to seek your views about the Project, including the findings of the preliminary environmental studies described in the PEIR.

You may wish to note that as part of its community consultation under section 47 of the Planning Act 2008, MPL has published a Statement of Community Consultation (SoCC) which can be found at [www.millbrookpower.co.uk](http://www.millbrookpower.co.uk). It is also available for inspection in hard copy at:

- Central Bedfordshire Council Office (Priory House, Monks Walk, Chicksands, Shefford, Bedfordshire SG17 5TQ, open Mon-Thurs 08:30–17:00 and Friday 08:30–16:00);
- Bedford Borough Council's Customer Service Centre (2 Horne Lane, Bedford MK40 1RA open Mon-Thurs 08:45-17:00 and Fri 08:45-16:45); and
- Marston Vale Forest Centre (Station Road, Marston Moretaine, Bedford MK43 0PR, open Mon-Sun 10:00-16:00);

and at the following local libraries:

<b>Bedford Library</b> Harpur Street, Bedford, MK40 1PG	Mon/Tues/Wed/Fri	09.00 – 18.00
	Thurs	09.00 – 13.00
	Sat	09.00 – 17.00
	Sun	Closed
<b>Ampthill Library</b> 1 Dunstable Street, Ampthill, Bedford, MK45 2NL	Mon/Wed/Fri	10.00 – 18.00
	Tues	Closed
	Thurs	14.00 – 18.00
	Sat	10.00 – 13.00
	Sun	Closed
<b>Wootton Library</b> Lorraine Road, Wootton, MK43 9LH	Mon/Fri	14.00 – 18.00
	Tues	Closed
	Wed	10.00 – 13.00/14.00-18.00
	Thurs	Closed
	Sat	10.00 – 13.00
	Sun	Closed



As part of its consultation with the community, MPL will be holding public exhibitions about the Project at these locations and times:

<b>Friday 9<sup>th</sup> June 2017:</b> <b>15.00-19.30</b>	Marston Moretaine Village Hall, Bedford Road, Marston Moretaine, MK43 0LD
<b>Saturday 10<sup>th</sup> June 2017:</b> <b>09.00-13.00</b>	Stewartby Club, Stewartby Way, Stewartby, MK43 9NB
<b>Monday 12<sup>th</sup> June 2017:</b> <b>16.00-20.00</b>	Wingfield Club, 37 Church Street, Ampthill, MK45 2PL
<b>Tuesday 13<sup>th</sup> June 2017:</b> <b>12.30- 15.30</b>	Lidlington Village Hall, High Street, Lidlington, MK43 0RT

## 7 How to respond

The consultation period on the Project will run from 29<sup>th</sup> May until 2<sup>nd</sup> July 2017 (inclusive), and we would therefore welcome your views on the Project on or before 5.00pm on 2<sup>nd</sup> July 2017. If you respond to our consultation, please include your name and an address in your response.

Please note that responses may be made public, subject to data protection laws.

Responses to the consultation on the Project can be made via:

**Website:** [www.millbrookpower.co.uk](http://www.millbrookpower.co.uk)

**Email:** [info@millbrookpower.co.uk](mailto:info@millbrookpower.co.uk)

**Tel:** 0131 550 3380

**Freepost:** Freepost Plus RTXR-ZKKX-XYLT Millbrook Power Ltd, 49 York Place, Edinburgh EH1 3JD

We look forward to receiving your comments.

Yours faithfully



**Dermot Scanlon**  
**Director**

For and on Behalf of Peter Brett Associates LLP  
33 Bowling Green Lane, London, EC1R 0BJ

Encs:

- PEIR NTS;
- Project Overview Document;
- Consultation Leaflet;
- CD containing all PEIR Documents.



Your ref:

Our ref: MPL

16 May 2017



Peter Brett Associates LLP  
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T: +44 20 3824 6600  
E: London@peterbrett.com

Oil and Pipelines Agency  
Aviation House  
1st Floor, Zone A  
125 Kingsway  
London  
WC2B 6NH

Dear Sir / Madam

**RE: Millbrook Power Station, Rookery South Pit, Millbrook, Bedfordshire**

**Regulation 11 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2009 (the "EIA Regulations 2009")**

Peter Brett Associates ("PBA") acts for Millbrook Power Limited ("MPL").

MPL intends to apply to the Secretary of State for Business, Energy and Industrial Strategy for a Development Consent Order ("DCO") under section 37 of the Planning Act 2008 ("the 2008 Act") to authorise the construction, operation and maintenance of an up to 299MW gas fired power station together with its associated gas and electrical connections to the existing electricity and gas networks (the "Project").

MPL was recently acquired by the UK energy company Drax Group PLC ("Drax"). Drax is seeking to develop gas-fired power stations at Millbrook and elsewhere in the UK to support the Government's drive to a low carbon economy by providing back up to the National Grid and plugging the gaps created by intermittent renewables.

The Project was taken through the first stages of the DCO planning application process in 2014 and MPL undertook the first phase of statutory consultation on the Project between 13<sup>th</sup> October 2014 and 16<sup>th</sup> November 2014 ("Phase 1 consultation"). However, due to market and political uncertainty, in March 2015 MPL put on hold its plans for the Project and notified the public that it was doing so. Under the new ownership of Drax, the Project is now once again being taken forward in acknowledgement of the fact that there remains a national need for new gas-fired power stations to be built in the UK.

Due to the nature and size of the Project, MPL is required under the Infrastructure Planning (Environmental Impact Assessment) Regulations 2009 (the "EIA Regulations 2009") to undertake an Environmental Impact Assessment ("EIA"). All development in Schedule 1 ("Schedule 1 development") requires an EIA.

The Project falls under the EIA Regulations 2009 regime and not the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the "EIA Regulations 2017") regime. This is



because a scoping opinion was requested from the Secretary of State under the EIA Regulations 2009 before the commencement of the EIA Regulations 2017. This means that, in accordance with the transitional arrangements at Regulation 37(2)(a)(ii) of the EIA Regulations 2017, the EIA Regulations 2009 will continue to apply to the Project.

The Project is a Schedule 1 development as it is a thermal power station with a heat output of 300MW or more (as listed in Schedule 1, paragraph 2(a) of the EIA Regulations 2009). The proposed application for a DCO will therefore be accompanied by an Environmental Statement ("ES"). The ES will provide a detailed project description and consider the likely significant environmental effects, both positive and negative, of the Project.

Under section 48 of the 2008 Act and Regulation 4 of the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009, MPL is publishing a notice of the proposed application for a DCO for the Project in the London Gazette, the Times, the Bedfordshire on Sunday and the Bedford Times & Citizen. Under Regulation 11 of the EIA Regulations 2009, MPL is required to send a copy of the section 48 notice to consultation bodies (as defined in the EIA Regulations 2009) and to any person notified to the applicant in accordance with regulation 9(1)(c) of the EIA Regulations 2009.

Accordingly, MPL hereby provides a copy of the section 48 notice to you. The enclosed notice sets out details of the project timescales, revised design parameters and explains where to find further details of the Project.

As the project design parameters have changed since 2014, you will be invited, by a separate letter, to submit comments on the MPL proposals during the second phase of statutory consultation which will run from 29th May 2017 until 2nd July 2017 (inclusive).

Should you require any further information, please do not hesitate to contact:

Freepost Plus [RTXR-ZKKX-XYLT]  
Millbrook Power Ltd  
49 York Place  
Edinburgh  
EH1 3JD

0131 550 3380

Yours faithfully



Dermot Scanlon  
**Director**

For and on Behalf of Peter Brett Associates LLP

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t +44 20 3824 6600  
e [London@peterbrett.com](mailto:London@peterbrett.com)  
w [www.peterbrett.com](http://www.peterbrett.com)

Enc.

## **Section 48, Planning Act 2008**

### **Regulation 4 Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009**

#### **Notice of proposed application for a Development Consent Order to construct and operate the Millbrook Power Project, Rookery South Pit, Bedfordshire**

- 1 Notice is hereby given that Millbrook Power Limited ("MPL") of Drax Power Station, Drax, Selby North Yorkshire, YO8 8PH intends to apply to the Secretary of State for a Development Consent Order ("DCO") pursuant to section 37 of the Planning Act 2008 ("the 2008 Act") to authorise the construction, operation and maintenance of an up to 299 megawatts ("MW") gas-fired electricity generation project at the former clay extraction site in Bedfordshire.
- 2 This project comprises a power generation plant, associated gas connection to the National Transmission System (NTS) and electrical connection to the National Grid Electricity Transmission System (NETS) (together, the "Project"). MPL intends to submit its DCO application for the Project in Q4 2017.
- 3 MPL was recently acquired by the UK energy company Drax Group PLC (Drax). Drax is seeking to develop gas-fired power stations at Millbrook and elsewhere in the UK to support the Government's drive to a low carbon economy by providing back up to the National Grid and plugging the gaps created by intermittent renewables.
- 4 The Project was taken through the first stages of the DCO planning application process in 2014. However, due to market and political uncertainty, in March 2015 MPL put on hold its plans for the Project and notified the public that it was doing so. Under the new ownership of Drax, the Project is now once again being taken forward in acknowledgement of the fact that there remains a national need for new gas-fired power stations to be built in the UK.
- 5 The site for the generating equipment covers an area of approximately 4 ha and is located within Rookery South Pit (approximate grid reference 501373, 240734), which itself covers approximately 95 ha.
- 6 The proposed DCO would, among other things, license and authorise:
  - i. The construction, operation and maintenance of an open cycle gas turbine power generation plant consisting of one gas turbine generator fuelled by natural gas with a rated electrical output of up to 299 MW.
  - ii. Provision of:
    - a. One gas turbine generator;
    - b. One exhaust gas emission flue stack;
    - c. Fin fan coolers;
    - d. An administration building and office, workshop, store building, control room, telemetry apparatus, maintenance compound and emergency generator;

- e. A fire water tank and demineralised water storage tank;
- f. Security infrastructure, including cameras, perimeter fencing and a gatehouse;
- g. Site lighting infrastructure, including perimeter lighting columns;
- h. Internal roadways, car parking, pedestrian network, cycle parking, hardstanding and water trailers;
- i. Site vehicular access(es), including a proposed access road from Green Lane to the site;
- j. A 400 kV electrical connection to export electricity produced by the power generation plant to the NETS. This will comprise a new substation connected to the existing 400 kV overhead lines via underground cables. This part of the project may be delivered in one of two ways:
  - i. Option 1 – this would require replacing one existing tower with a new tower and two Sealing End Compounds (SECs) which would be connected to the substation via underground cables. This option would result in no net additional towers; or
  - ii. Option 2 - this would require replacing one existing tower with a new tower and one larger SEC which would be connected to the substation via underground cables. This option would result in no net additional towers.

Site vehicular access is required to the SEC(s)

- k. A transformer compound located within the generating equipment site containing a generator step up transformer, unit and other transformers, overhead line gantry and associated equipment;
- l. A substation located adjacent to the western boundary of the power generation plant within Rookery South Pit;
- m. A new underground gas pipeline connection to import natural gas from the NTS to the power generation plant;
- n. An above ground installation at the NTS connection point containing:
  - i. a minimum offtake connection (MOC) facility comprising a remotely operable valve, control and instrumentation kiosk and electrical supply kiosk;
  - ii. a pipeline inspection gauge (PIG) facility, comprising a PIG launching facility, emergency control valve, isolation valve and control and instrumentation and electricity supply kiosks; and
  - iii. access to the compound.
- o. A natural gas receiving station and compound at the generating equipment site containing:
  - i. a PIG receiving facility;
  - ii. isolation valve;
  - iii. control and instrumentation kiosks; and
  - iv. gas filters, metering, heating boiler and (if required) compressors.
  - v. Emergency generator



- p. Temporary construction compound(s) for the power generation plant, gas connection and electrical connection together with access(es);
  - q. Site drainage and waste management infrastructure;
  - r. Electricity, water, wastewater and telecommunications and other services; and
  - s. The following additional measures may also be taken by the applicant if required:
    - i. Tree and hedge removal along the gas and electricity connection routes;
    - ii. Planting, landscaping and ecological mitigation, permanent and temporary fencing;
    - iii. The temporary stopping up of public footpath(s) during the construction works described above;
    - iv. Permanent and temporary changes to the highway network for the Project;
    - v. The permanent and / or temporary compulsory acquisition of land and / or rights in land for the Project;
    - vi. The required, overriding of easements and other rights over or affecting land for the Project;
    - vii. The application and/or disapplication of legislation relevant to the Project;
    - viii. Construction, operation and maintenance of associated development, including, but not limited to, those items listed in paragraph 6 above;
    - ix. High voltage and low voltage cabling, equipment and controls and associated telemetry and electrical protection auxiliary cabling;
    - x. Underground gas pipeline connection(s), associated telemetry and cathodic protection test / transformer rectifier unit; and
    - xi. Such ancillary, incidental and consequential works, provisions, permits, consents, waivers or releases as are necessary and/or convenient for the successful construction, operation and maintenance of the Project.
- 7 Due to the nature and size of the Project, MPL is undertaking an Environmental Impact Assessment (EIA). The Project is classified as EIA development under the Infrastructure Planning (Environmental Impact Assessment) Regulations 2009 (EIA Regulations 2009). The proposed application for a DCO will therefore be accompanied by an Environmental Statement (ES). The ES will provide a detailed Project description and consider the likely significant environmental effects, both positive and negative, of the Project.
- 8 The Project falls under the EIA Regulations 2009 regime and not the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (EIA Regulations 2017) regime. This is because a scoping opinion was requested from the Secretary of State under the EIA Regulations 2009 before the commencement of the EIA Regulations 2017. This means that, in accordance with the transitional arrangements at Regulation 37 of the EIA Regulations 2017, the EIA Regulations 2009 will continue to apply to the Project.
- 9 Information (including plans and maps) about the nature and location of the Project, as well as the information so far compiled about the Project's likely significant environmental effects

is contained in a Preliminary Environmental Information Report (PEIR) and summarised in a Non-Technical Summary of the PEIR (the "Documents"). The Documents will be available to view or download free of charge from the Project website from 29<sup>th</sup> May 2017. The Project website is located at the following link: [www.millbrookpower.co.uk](http://www.millbrookpower.co.uk).

- 10 The Documents will be available to view free of charge from 29<sup>th</sup> May 2017 to 2 July 2017 at the following libraries.

<b>Bedford Library</b> Harpur Street, Bedford, MK40 1PG	Mon/Tues/Wed/Fri: 09.00 – 18.00 Thurs: 09.00 – 13.00 Sat: 09.00 – 17.00 Sun: Closed
<b>Amphill Library</b> 1 Dunstable Street, Amphill, Bedford, MK45 2NL	Mon/Wed/Fri: 10.00 – 18.00 Tues: Closed Thurs: 14.00 – 18.00 Sat: 10.00 – 13.00 Sun: Closed
<b>Wootton Library</b> Lorraine Road, Wootton, MK43 9LH	Mon/Fri: 14.00 – 18.00 Tues: Closed Wed: 10.00 – 13.00 / 14.00 -18.00 Thurs: Closed Sat: 10.00 – 13.00 Sun: Closed

- 11 The Documents will also be available to view free of charge from 29<sup>th</sup> May 2017 at the following locations:

Central Bedfordshire Council main offices, Priory House, Chicksands, Shefford, SG17 5TQ	Tel. 0300 3008301
Bedford Borough Council Customer Service Centre, 2 Horne Lane, Bedford, MK40 1RA	Tel. 01234 267422
Marston Vale Forest Centre, Station Road, Marston Moretaine, MK43 0PR	Tel. 01234 767037

- 12 The technical appendices to the PEIR will only be available electronically at the libraries, council offices and Forest Centre listed above.
- 13 The Documents will also be available to view free of charge at public exhibitions, which will be held by MPL between the 9<sup>th</sup> June 2017 and 13<sup>th</sup> June 2017 at the following locations:

Friday 9 <sup>th</sup> June 2017 15.00-19.30	Marston Moretaine Village Hall, Bedford Road, Marston Moretaine, MK43 0LD
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Saturday 10 <sup>th</sup> June 2017 09.00-13.00	Stewartby Club, Stewartby Way, Stewartby, MK43 9NB
Monday 12 <sup>th</sup> June 2017 16.00-20.00	Wingfield Club, 37 Church Street, Ampthill, MK45 2PL
Tuesday 13 <sup>th</sup> June 2017 12.30- 15.30	Lidlington Village Hall, High Street, Lidlington, MK43 0RT

- 14 The Documents can be obtained by writing to: Millbrook Power Limited, 49 York Place, Edinburgh, EH1 3JD. A reasonable copying charge may apply up to a maximum of £250 for the full suite of Documents and £10 for an electronic copy on CD. Copies of individual Documents are also available on request.
- 15 If you wish to respond to this notice, or make any representations in respect of the Project as it is currently proposed, these should be sent to MPL. When making a response or representation, please include your name and an address where correspondence about your response or representation can be sent.
- 16 Responses or representations may be submitted in the following ways:
- Website:** [www.millbrookpower.co.uk](http://www.millbrookpower.co.uk)
- Email:** [info@millbrookpower.co.uk](mailto:info@millbrookpower.co.uk)
- Freepost:** Freepost plus RTXR-ZKKX-XYLT, Millbrook Power Ltd, 49 York Place, Edinburgh, EH1 3JD
- Phone:** 0131 550 3380
- 17 Your comments will be analysed by MPL and any appointed agent of MPL. Copies may be made available, in due course, to the Planning Inspectorate, Secretary of State and other relevant statutory authorities so that your comments can be noted. We will request that your personal details are not placed on the public record. Your personal details will be held securely by MPL and any appointed agent of MPL in accordance with the Data Protection Act 1998 and will be used solely in connection with the consultation process and subsequent development consent application(s) and, except as noted above, will not be passed to any third parties.
- 18 Please note that all responses and representations on the Project must be received by MPL on or before 5.00pm on 2<sup>nd</sup> July 2017.





Headquarters  
Melbourn Ambulance Station  
Whiting Way  
Melbourn  
CAMBRIGSHIRE  
SG8 6NA

26/06/17

Dear Sir or Madame,

**Millbrook Power Limited: Proposed gas fired power plant at Rookery South Pit, Nr Millbrook,  
Bedfordshire  
Statutory consultation under section 42 of the Planning Act 2008**

Please find below the East of England Ambulance Service NHS Trust (EEAST or the Trust) response to the Stage Two Consultation for the proposed gas fired power plant near Millbrook.

EEAST holds no opinion either for or against the proposed gas fired power plant and principle concerns to the Trust are those pertaining to generic risk associated with any substantive development, and the potential impact upon emergency response and resourcing within the effected locality.

The NHS Ambulance Service responds to emergency calls made through the 999 system; in addition to this the Trust also responds to doctors' calls and provides a non-emergency patient transport service. Assets are deployed at the beginning of each shift with responders being *on the road* for the majority of their duty period; as a regional Ambulance Service any 999 request to attend Millbrook or the surrounding villages could see a response being despatched from anywhere in the County or further afield. Ambulance resources include rapid response vehicles (RRV), ambulances, managers, community first responders (lay volunteers), as well as air ambulances capable of bringing specialist doctors, nurses and critical care paramedics to the scene of an emergency.

There is an expectation from the public that when a 999 call is made to the Ambulance Service, a response will be despatched and arrive on scene in a timely manner. The NHS Ambulance Service is compelled to work towards Government set response times and targets, and failure to achieve these results in detriment to patient care and severe financial penalties being imposed. EEAST works at 98% capacity at all times and resources are finite. The current response from EEAST to the areas within and around the proposed new build cannot be diminished as a result of the gas fired power plant development.

It is noted by the Trust that although the Phase 2 consultation has refined details under consideration by Millbrook Power, the level of in depth detail to permit full evaluation of necessitated mitigation against the impacts of the gas fired power plant development to the Ambulance Service and the local populace is not available. EEAST understanding is that until final agreement is reached on preferred options (i.e. transport and accommodation, medical facilities available to workers etc.) that the Trust will not be able to determine specific prerequisites to mollify final preferences.

Generically the key aspects of concern relate to;

- Increase in workforce and associated medical emergencies leading to raised call volume and demand – information provided makes reference to only five members of staff working at the plant at any one time and 40 additional staff during annual maintenance
- Traffic volume increase leading to longer and/or delayed response times – information provided references 53 HGV movements and 20 car movements per day during construction
- Detriment to the local health economy

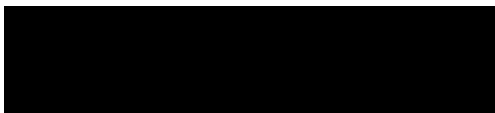
Chief Executive: Robert Morton

Chair: Sarah Boulton

[www.eeastamb.nhs.uk](http://www.eeastamb.nhs.uk)

As the project continues, the Trust will work with Millbrook Power to ensure that potential consequences from these options are tapered from an Ambulance and primary healthcare perspective. We look forward to working with Millbrook Power and partner agencies through the remainder of the consultation process and providing joint review of mitigation proposed to ensure that provision and delivery to the public of EEAST services' within the local area to the development continues to the highest possible standard.

Yours sincerely



Rob Hayes  
Senior Resilience Manager (Acting)

East of England Ambulance Service NHS Trust



## Francesca Rowson

---

**From:** Francesca Rowson  
**Sent:** 17 October 2017 12:16  
**To:** Francesca Rowson  
**Subject:** Your Reference: MPL/S42 MILLBROOK Our Reference: PE132459. Plant Not Affected Notice from ES Pipelines

---

**From:** ESP Utilities Group Ltd [<mailto:donotreply@espug.com>]  
**Sent:** 31 May 2017 14:41  
**To:** London <[London@peterbrett.com](mailto:London@peterbrett.com)>  
**Subject:** Your Reference: MPL/S42 MILLBROOK Our Reference: PE132459. Plant Not Affected Notice from ES Pipelines

Peter Brett Associates LLP

31 May 2017

Reference: MPL/S42 MILLBROOK

Dear Sir/Madam,

Thank you for your recent plant enquiry at (MPL/S42 MILLBROOK).

I can confirm that ESP Gas Group Ltd has no gas or electricity apparatus in the vicinity of this site address and will not be affected by your proposed works. Therefore, ESP **DOES NOT OBJECT** to the proposed stopping up order.

ESP are continually laying new gas and electricity networks and this notification is valid for 90 days from the date of this letter. If your proposed works start after this period of time, please re-submit your enquiry.

### **Important Notice**

Please be advised that any enquiries for ESP Connections Ltd, formerly known as British Gas Connections Ltd, should be sent directly to us at the address shown above or alternatively you can email us at: [PlantResponses@espipelines.com](mailto:PlantResponses@espipelines.com)

Yours faithfully,

Alan Slee  
**Operations Manager**

Bluebird House  
Mole Business Park  
Leatherhead  
KT22 7BA

☎ 01372 587500 📠 01372 377996

<http://www.espug.com>

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Historic England

EAST OF ENGLAND OFFICE

Mr Dermot Scanlon  
582710

Direct Dial: 01223

Millbrook Power Ltd

Freepost plus RTXR-ZKKX-XYLT  
PL00095962

Our ref:

49 York Place

Edinburgh

EH1 3JD  
2017

22 June

Dear Mr Scanlon

**Millbrook Power Limited: Proposed gas fired power plant at Rookery South Pit, Nr. Millbrook, Bedfordshire**

Thank you for consulting us under Section 42 of the Planning Act 2008 on a proposed gas fired power plant at Rookery Pit south.

**The Proposal**

The project comprises a new generation power plant, a new underground gas pipeline incorporating an above ground installation at the point of connection and a new electrical connection to export power. There are two options for how the electrical connection could be delivered. The site covers an area of 4 hectares. The final location and layout of the plant are yet to be determined. They will be finalised post consultation having regard to the consultation responses and further studies. The minimum stack height would be 32.5 meters and the maximum stack height would be 35 meters.

Following the consultations in 2014 several changes have been made including: the undergrounding of the electrical connection to the National Grid (avoiding the need for overhead transmission lines and additional transmission towers); a reduction in the



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number of turbines to one unit with one stack and a reduction in the height of the stack.

The consultation notes the design that will form the basis of the application will not be a final, detailed design, but one developed using the 'Rochdale Envelope'. We understand this should ensure all the realistic and likely worse case variations have been properly considered, set out and adequately assessed.

The supporting information explains that the proposed Millbrook Power Station would co-exist with Covanta's (or its successor's) power station in Rookery South pit. The Preliminary Environmental Impact Report (PEIR) includes cumulative effects of the project including Rookery South RRF Project, Covanta.

We understand the Rookery is subject to an ongoing low level restoration scheme which would take place regardless of the current proposals. This is to restore the former clay workings to low grade agriculture, achieved at low level (below pre excavated ground levels). It would be helpful if the applicant were clear about the implications of the land levels on the visibility of the new plant.

## **Historic England Advice on the Preliminary Environmental Impact Report**

### *Visual Material*

The project is proposed at and in the area of the former clay extraction pit at Rookery South. It is described in the PEIR Non-Technical Summary in terms of the various component parts and the indicative dimensions of main plant items, sub-station and electrical connection are given in Table 3.1 in the PEIR. However, there is little visual information to convey the appearance and scale of the plant. The only visual indication of the appearance is as presented in the photomontages in the Landscape and Visual Impact (which we understand date from the earlier scheme proposed in 2014) and Insert 2 in the PEIR Non-Technical Summary.

In order to consider and assess the impacts on the historic environment this visual information is essential. It is particularly difficult to comment on whether the first or second option for the Electrical Connection would have a greater impact in the absence of this (one involving 2 sealing end compounds and the other one larger sealing in compound). We do note that the PEIR notes the effects of both options are expected to be substantially the same in heritage terms as the total area for development is substantially the same (13.4.3).

The photomontages will be critical for understanding and assessing the impact of the development on the setting of the surrounding heritage assets. A number are provided within the PEIR appendices under the Landscape and Visual Impact work.



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We understand these photomontages undertaken in 2014. Some of the viewpoints are absent, numbers 5 and 7. We understand that there will be photomontages to allow for the assessment on Houghton House, 4 and 5, and Amptill Park House, 3 and 7. We suggest a further viewpoint from the area around Houghton House would be necessary and valuable. Viewpoint 3 seems to show part of the plant behind a tree but this would presumably come into view from other parts of the site. Even if the parts cannot be seen together, both are likely to have an impact and the information provided should enable this to be considered. It would also be helpful to have a viewpoint illustrating the impact on the significance of Marston Mortaine church tower. With regard to the quality of the photomontages produced, the images in this report are very unclear and we assume the when these are updated; they will be of better quality. As this is critical to the assessment of the setting of heritage assets please ensure that the images are of a suitable quality and high resolution, particularly when the documents are enabled for digital dissemination.

The figures include a Zone of Theoretical Visibility. Again, this figure is not easy to read as the map on which it is produced is very faint. It would be helpful if this could be addressed.

*Methodology*

We have reservations about the assessment methodology of the Report which is dealt with in section 4 of the PEIR. This uses a series of matrices and in order to provide a consistent approach across the different environmental components, a general structure is provided in tables 4.1-3. In table 4.1 showing a sensitivity matrix, a heritage site falls into the category of medium sensitivity. We consider many of the heritage sites under assessment to be of high sensitivity. We note that for some environmental topics the significance criteria may differ. Within the historic environment chapter, it does attribute a high sensitivity to various designated heritage assets (table 13.2).

The Historic Environment chapter in the PEIR deals with grade II buildings. It describes the positive contribution of their settings to their significance as 'generally limited to their immediate vicinity,' (13.5.4). While we do not wish to comment on the impacts on individual grade II buildings, we do not agree that the grading of a building reflects the contribution of setting to its significance. The document continues to note that the majority of these grade II buildings are in settlements and do not have a strong interaction with the surrounding countryside. This may be the case but there may be others where setting may encompass a wide area and makes a contribution to their significance. For example, the tall chimneys at Stewartby, listed grade II, have a very extensive setting as they are visible in long views across the Marston Vale.

The PEIR notes the designated assets were viewed from the closest possible publicly accessible location (13.5.9). Although it continues that this did not lead to any



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limitations to the assessment, we have concerns about this approach. Setting is not defined by public access and where there are potentially notable impacts on designated heritage assets, efforts should be made to ensure these are properly assessed. This may mean trying to secure access to undertake the assessment. For example, at Ampthill Park House there are likely to be key views from which the development should be assessed. These should include the front steps (and potentially the principal rooms within the house) and the area in front of the north of the house where there is a statue of a hound. This provides a focal point and leads the eye out to the landscape beyond in the direction of the proposed development. This is the same for the scheduled moated sites at Thrupp End and Marston Moritaine where a suitable image from the site itself should be provided.

### *Assessment*

With regard to the assessment, the document notes the stack may be seen within the settings of designated heritage assets and consequently may have an effect on the contribution setting makes to significance (13.7.7). This impact is considered in detail in Appendix 13.2. However, this is summarised as no more than a slight adverse indirect effect and for the majority of assets there would be a neutral indirect effect. Those where there is a slight indirect effect are South Pilling Farm, grade II, Park House, grade II\*, Ampthill Park, scheduled monument and grade II registered park and garden and Houghton House, scheduled monument and grade I (13.7.8). It notes the stack is similar in nature to existing structures in the area. It would appear lower than these as it sits within the pit so 20 meters would be visible above ground level (13.7.9). It considers the gas and electrical connection would have no impact on the setting of designated heritage assets (13.7.14 and 13.7.19). It is not clear how the impact of the sealing end compounds has been considered. If these are within the pit (their location is unclear) they may only just rise above ground level, being 17 metres in height. If they are outside the pit, they are likely to be more visible in the landscape. While of a lower height than the stack, the cumulative impact of this built development on the setting and significance of the heritage assets should be considered. The conclusion is that effects on setting are moderate but this effect is based on the contribution of setting to significance and not significance itself. This is not considered to reduce the significance of the asset but have a minor magnitude of impact to contribution setting makes to significance. The significance is considered to be largely unaffected or not significant (13.10.14). It would also be helpful if the impacts were considered using the language of the National Planning Policy Framework. This requires an assessment of harm on the significance of heritage assets. On an initial assessment of the photomontages provided with at PIER stage, we consider there is likely to be notable harm to the significance of Ampthill Park, Park House and Houghton House through a development within their setting.

The detailed assessment on heritage assets is set out in the table at Appendix 13.2. As is explained below, it is difficult to undertake an assessment of the impacts until the



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photomontages are updated and further visual information is provided. However, we have general reservations about how the impacts on the highly graded heritage assets referred to above have been assessed. These assessments note the modern industrial and transport infrastructure in the Marston Vale and take a view that this already compromises the setting of heritage assets. However, they do not consider the potentially harmful cumulative effect of more industrial development in their setting. As has been discussed, the effects would need to be considered in terms of levels of harm in accordance with the NPPF.

The cumulative impact of the proposed plant together with the consented Covanta scheme is considered in the PEIR. There is not considered to be cumulative impact with Covanta RRF during construction (13.8.8). In the operation phase there are considered to be not significant effects (13.8.16). It considers the cumulative and combined impacts with Covanta are the same nature and magnitude as the project on its own (13.8.17). Although as we have noted, the photomontages are not particularly clear, we consider the cumulative impact of both projects on the significance of heritage assets, in particular Park House, Ampthill Park and Houghton House, is likely to be harmful. This should be re considered once the photomontages are updated.

### *Archaeology*

We note that the archaeological matters have been considered by the CBC archaeologists following an evaluation, the results of which are summarised in the report. The report also states that a post DCO programme of works has been agreed. We would not wish to comment further on this approach, however would want to note that any pre-commencement works such as enabling works or geoarchaeological investigations would need to be discussed with the CBC archaeologist and may need to be subject to a programme of archaeological work and where necessary an archaeological WSI would need to be produced to the approval of CBC archaeological team.

### **Next Steps**

We hope this letter is helpful in developing the assessment. We also recommend that the ES chapter is amended to take these comments into account, particularly the approach to the assessment of significance and harm. We would be happy to discuss any of these points with you further. In particular, it would be useful to consider the impact assessments on the individual highly designated heritage assets in more detail once additional visual information is available.

Yours sincerely,



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Will Fletcher  
Inspector of Ancient Monuments  
will.fletcher@HistoricEngland.org.uk



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## Morina Benjamin

---

**From:** Sarah Watt <sarahwatt36@gmail.com>  
**Sent:** 04 June 2017 19:56  
**To:** Info Millbrook  
**Cc:** Gill Wiggs; Lisa Frangiamore  
**Subject:** re: Request for Additional Information: Houghton Conquest Parish Council  
**Attachments:** Millbrook Power Ltd - Letter.docx

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Sir/ Madam,

Thank you for posting the parish council the documentation around the Millbrook Power Plant for our review.

I have been appointed to represent the council on this matter, and feedback as appropriate. I have reviewed the documentation, and attach an agreed letter requesting clarification on a number of points.

I would appreciate it if we could arrange a suitable time for a call or face to face meeting to address the points.

Look forward to your response,

Sarah Watt  
Parish Councillor  
(Houghton Conquest)

Millbrook Power Ltd.  
29 York Place  
Edinburgh  
EN1 3JD

On behalf of Houghton Conquest Parish Council  
28 Ridge View  
Houghton Conquest  
MK45 3FF

31 May 2017

Dear Sir/ Madam,

**Re: Proposed OCGT at Rookery South Pit, Near Millbrook, Bedfordshire.**

The Houghton Conquest Parish Council has recently reviewed the information provided regarding the installation of the OCGT at Rookery South Pit by Millbrook Power.

Following our review, and Parish Council discussion we would like to request further information/ clarification on a number of points:

- (1) We are currently unclear regarding the specific detail of the interaction between the Millbrook Power Project and the Covanta Waste Incineration Project. We are interested in quantitative assessment of environmental impact and cumulative effect over time.
- (2) The different installation options between the gas and electrical connections which we were asked to comment on seem to be very minor and subtle. We accept that we may have misunderstood this point, so some clarification would be appreciated.
- (3) There are some concerns regarding the attenuation pond and the risk flooding as well as emission to air from the stacks.

I would be grateful if we could either meet in person or have a telephone call to discuss these points. This additional information will be given to the council for further discussion.

Regards,

Sarah Watt  
Parish Councillor

[sarahwatt36@gmail.com](mailto:sarahwatt36@gmail.com)

# MARSTON MORETEYNE PARISH COUNCIL

## Clerk to the Council

Mrs. H. Trustam  
30 Armstrong Close  
Wilstead  
Bedford  
MK45 3EJ

Tel: 01234 743598

Email: [h.trustam@btinternet.com](mailto:h.trustam@btinternet.com)

2<sup>nd</sup> July 2017

Peter Brett Associates LLP  
33 Bowling Green Lane  
London  
EC1R 0BJ

For the attention of Mr. Dermot Scanlon – Director

Dear Mr Scanlon

Thank you for your letter dated 22<sup>nd</sup> May 2017. Marston Moreteyne Parish Council has been asked to comment on documents relating to Millbrook Power Limited's Proposed gas fired power plant at Rookery South Pit, Nr. Millbrook, Bedfordshire. Statutory consultation under Section 42 of the Planning Act 2008.

Having reviewed the documents and subsequent information within, Marston Moreteyne Parish Council has a number of concerns which are related to emissions and inversion.

Point 3.2.9 within the Preliminary Environmental Information Report (2017) – Non-Technical Summary Operation notes that *“the main potential effects arising from the operation of the Project are associated with the stack emissions arising as a result of the combustion of natural gas in the Generating Equipment. Emissions from the stack which have the potential **to cause impacts on human or ecological receptors are limited to Nitrous Oxides (NOx), which can increase ground level concentrations of nitrogen dioxide (NO2) which could impact human receptors or lead to nitrogen and acid deposition which could impact sensitive ecological habitats**”.*

Point 3.2.11 *“Air quality modelling has shown that an appropriate stack height which will achieve adequate dispersion of NOx to meet legislative limits and prevent any likely significant effects to identified receptors is between 32.5 m and 35 m. It is concluded that there are expected to be **no likely significant effects** during operation of the Generating Equipment on human or ecological receptors”.*

The Parish Council expresses deep concern regarding the potential increase of ground levels of Nitrogen Dioxide (NO<sub>2</sub>) which could be caused by emissions from the stack and the subsequent detrimental impact that this would have upon environmental habitats and effects upon both human life and wildlife.

The council would also draw attention to the wording in 3.2.11, especially *“it is concluded that there are expected to be no likely significant effects during operation ....”*. The council would like to know - significant in relation to what? At what level is a detrimental effect deemed significant?

The proposed site is within the Marston Vale. The council expresses deep concerns regarding emission inversions and the fact that any Nitros Oxide (NO<sub>2</sub>) gases have the potential to be delayed from being dispersed to a specific height and therefore this time delay has the effect that Nitrous Oxide gases could fall to the ground with detrimental effects.

The Parish Council feels that the above points warrant further a deeper investigation.

Yours sincerely,

*H. Trustam*

Mrs H. Trustam (Parish Clerk)



## Morina Benjamin

---

**From:** Demi McQueeney <DemiM@sourcedesignservices.co.uk>  
**Sent:** 26 June 2017 08:54  
**To:** London  
**Subject:** FW: PLANT ENQUIRY RESPONSES - NOT AFFECTED - TATA and KPN

The locations below are NOT AFFECTED by TATA and KPN apparatus.

None Given    Millbrook Power    Millbrook Power Station, Rookery South Pit, Millbrook Bedfordshire

**FROM 1<sup>ST</sup> JULY 2017, McNICHOLAS WILL NO LONGER REPRESENT KPN FOR PLANT PROTECTION.**

**Please send all enquiries after this date to [kpnplantenquiries@instalcom.co.uk](mailto:kpnplantenquiries@instalcom.co.uk)**

Please quote these references on any correspondence.

**Please note:**

*McNicholas, on behalf of our client, accept no liability for claims arising from inaccuracies, omissions or errors contained within your plant enquiry request.*

If you require further information please do not hesitate to contact us.

Kind Regards,



**McNicholas Plant Enquiry Team**

Telephone – 0330 055 8466/8469  
Facsimile – 01923 802704

Website - [www.mcnicholas.co.uk](http://www.mcnicholas.co.uk)

**Our team. Your solution.**



Demi McQueeney  
Administrator

Part of the  McNicholas Group

\*\*\*\*\*

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## Morina Benjamin

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**From:** Law, Duncan <Duncan.Law@milton-keynes.gov.uk>  
**Sent:** 03 July 2017 09:58  
**To:** Francesca Rowson  
**Subject:** RE: Millbrook Power Limited: Statutory consultation under Section 42 of the Planning Act 2008

Dear Francesca

RE: Millbrook Power Limited: Statutory consultation under Section 42 of the Planning Act 2008

Thank you for your recent request for consultation for the above. Milton Keynes Council has no comments to make as long as the development is carried out in accordance with regional and your local policies.

Kind regards

Duncan Law  
Senior Planning Officer (Development control) – West Team  
T: 01908 252485  
E: [duncan.law@milton-keynes.gov.uk](mailto:duncan.law@milton-keynes.gov.uk)

**Milton Keynes Council** | Planning Service | Growth, Economy and Culture | Place | Civic Offices | 1 Saxon Gate East  
| Milton Keynes | MK9

---

**From:** Francesca Rowson [mailto:frowson@peterbrett.com]  
**Sent:** 02 June 2017 16:45  
**To:** Law, Duncan  
**Cc:** Sarah Chandler; Edward Buckingham  
**Subject:** [EXT] Millbrook Power Limited: Statutory consultation under Section 42 of the Planning Act 2008

Dear Mr Law

We recently received your response to the current Section 42 consultation being carried out in respect of the proposed gas fired power plant at Rookery South Pit Nr. Millbrook. Over the last few weeks Milton Keynes Council have received two sets of information from PBA in relation to the proposal including a Section 48 notice and a Section 42 consultation pack.

In your response (attached for ease) you state that the s42 consultation documents will be uploaded to Milton Keynes online planning register. We request that these documents are not uploaded to the planning application register since these are consultation documents only and this may cause some confusion amongst the public and other consultees.

Instead the Council may wish to publish the S48 notice on the Councils website to help publicise the ongoing public consultation. Should the Council wish to submit further comments on the Project, please be aware that the statutory consultation period will close on **2nd July 2017**.

Kind regards,

**Francesca Rowson**

Senior Planner

For and on behalf of Peter Brett Associates LLP - [London Brewhouse Yard](#)



e [frowson@peterbrett.com](mailto:frowson@peterbrett.com)

w [peterbrett.com](http://peterbrett.com)



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Visit the Milton Keynes Council web site at <http://www.milton-keynes.gov.uk>

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Peter Brett Associates LLP (on Behalf of Millbrook Power)  
33 Bowling Green Lane  
London  
EC1R 0BJ

**Duncan Sharkey**  
Corporate Director - Place

**Anna Rose**  
Service Director Planning and Transport

**Our Ref:** 17/01450/CONS

**Your Ref:**

**Reply To:** Ducan Law

**Direct Line:**

**e-mail:** [ducan.law@milton-keynes.gov.uk](mailto:ducan.law@milton-keynes.gov.uk)

30th May 2017  
Dear Sir/Madam,

**Application no: 17/01450/CONS**

**Proposal: Notification of proposed application for a Development Consent Order to construct and operate the Millbrook Power Project (notification under section 42 of the Planning Act 2008)**

**At: Millbrook Power Station, Rookery South Pit, Millbrook, Bedfordshire,**

I am writing to acknowledge receipt of your application. I have checked the paper work submitted and I am treating the application as being valid. If I later find out that the submission is not valid, I will write to you again.

Your application will be posted on the Council's web site for the public to view. Personal details such as your signature, your personal e-mail address, and your personal telephone number will be removed from the documents posted on the web site. You can keep track of your application's progress through the Council's Planning Applications Public Access system via the following link [www.milton-keynes.gov.uk/publicaccess](http://www.milton-keynes.gov.uk/publicaccess). All of the information which is important in the decision making process can be viewed through Public Access. However, some background information held on the planning file can not be viewed through Public Access.

Every effort will be made to determine your application in the shortest time possible. However, should there be any delay in dealing with your application you will be notified of the circumstances and your permission requested for an extension to the statutory determination date stated below. Nevertheless I hope it will be possible to determine the application before this date.

If by **19th July 2017**, therefore, you have not been given a notice of a decision, and you have not agreed in writing that the determination period may be extended you may appeal to the Secretary of State. Appeals must be lodged within six months of that date unless the application has already been referred by the Authority to the Secretary of State for the

Development Management, Planning and Transport  
Civic Offices, 1 Saxon Gate East, Central Milton Keynes MK9 3EJ  
Planning Enquiries Direct Line (01908) 252358  
MK Council Tel: (01908) 691691  
[www.milton-keynes.gov.uk](http://www.milton-keynes.gov.uk)



Environment. Appeals must be made on a form which is obtainable from the Planning Inspectorate, Temple Quay House, 2 The Square, Temple Quay, Bristol BS1 6PN.

Yours faithfully,

**Ducan Law**  
**Senior Planning Officer (Dev Control)**

**On behalf of Head of Development Management**



Submitted electronically to:

[info@millbrookpower.co.uk](mailto:info@millbrookpower.co.uk)

Nick Dexter  
DCO Liaison Officer  
Land & Business Support

[Nicholas.dexter@nationalgrid.com](mailto:Nicholas.dexter@nationalgrid.com)

Tel: +44 (0)7917 791925

[www.nationalgrid.com](http://www.nationalgrid.com)

30<sup>th</sup> June 2017

Dear Sir/Madam,

## **Millbrook Power Limited: Proposed Gas Fired Power Plant at Rookery South Pit, Nr. Millbrook, Bedfordshire**

### **Statutory consultation under Section 42 of the Planning Act 2008**

This is a joint response by National Grid Electricity Transmission plc (NGET) and National Grid Gas plc (NGG)

I refer to your letter dated 22<sup>nd</sup> May 2017 regarding the above proposed application. Having reviewed the section 42 documents, I would like to make the following comments:

#### National Grid Infrastructure within or in close proximity to the Proposed Order Limits

##### **National Grid Electricity Transmission**

National Grid Electricity Transmission has a high voltage electricity transmission overhead line which lies within the proposed order limits. This line forms an essential part of the electricity transmission network in England and Wales and include the following:

- ZA 400kV Overhead Transmission Line – Grendon to Sundon

##### **Electricity Infrastructure:**

- National Grid's Overhead Line/s is protected by a Deed of Easement/Wayleave Agreement which provides full right of access to retain, maintain, repair and inspect our asset
- Statutory electrical safety clearances must be maintained at all times. Any proposed buildings must not be closer than 5.3m to the lowest conductor. National Grid recommends that no permanent structures are built directly beneath overhead lines. These distances are set out in EN 43 – 8 Technical Specification for “overhead line clearances Issue 3 (2004) and also shown in the following National Grid Document:  
<http://www2.nationalgrid.com/WorkArea/DownloadAsset.aspx?id=6169>
- If any changes in ground levels are proposed either beneath or in close proximity to our existing overhead lines then this would serve to reduce the safety clearances for such overhead lines. Safe clearances for existing overhead lines must be maintained in all circumstances.

- The relevant guidance in relation to working safely near to existing overhead lines is contained within the Health and Safety Executive's ([www.hse.gov.uk](http://www.hse.gov.uk)) Guidance Note GS 6 "Avoidance of Danger from Overhead Electric Lines" and all relevant site staff should make sure that they are both aware of and understand this guidance.
- Plant, machinery, equipment, buildings or scaffolding should not encroach within 5.3 metres of any of our high voltage conductors when those conductors are under their worse conditions of maximum "sag" and "swing" and overhead line profile (maximum "sag" and "swing") drawings should be obtained using the contact details above.
- If a landscaping scheme is proposed as part of the proposal, we request that only slow and low growing species of trees and shrubs are planted beneath and adjacent to the existing overhead line to reduce the risk of growth to a height which compromises statutory safety clearances.
- Drilling or excavation works should not be undertaken if they have the potential to disturb or adversely affect the foundations or "pillars of support" of any existing tower. These foundations always extend beyond the base area of the existing tower and foundation ("pillar of support") drawings can be obtained using the contact details above
- National Grid Electricity Transmission high voltage underground cables are protected by a Deed of Grant; Easement; Wayleave Agreement or the provisions of the New Roads and Street Works Act. These provisions provide National Grid full right of access to retain, maintain, repair and inspect our assets. Hence we require that no permanent / temporary structures are to be built over our cables or within the easement strip. Any such proposals should be discussed and agreed with National Grid prior to any works taking place.
- Ground levels above our cables must not be altered in any way. Any alterations to the depth of our cables will subsequently alter the rating of the circuit and can compromise the reliability, efficiency and safety of our electricity network and requires consultation with National Grid prior to any such changes in both level and construction being implemented.

### **National Grid Gas Transmission**

National Grid has three high pressure gas transmission pipelines located within the proposed order limits. The high pressure gas pipelines located within this area are:

- FM09- Huntingdon- Steppingley
- FM26- Huntingdon- Steppingley
- FM07- Old Warden- Chalgrove

I enclose plans showing the routes of our overhead line and gas transmission pipelines.

### **Specific Comments – Gas Infrastructure**

The following points should be taken into consideration:

- National Grid has a Deed of Grant of Easement for each pipeline, which prevents the erection of permanent / temporary buildings, or structures, change to existing ground levels, storage of materials etc.

## Pipeline Crossings:

- Where existing roads cannot be used, construction traffic should ONLY cross the pipeline at previously agreed locations.
- The pipeline shall be protected, at the crossing points, by temporary rafts constructed at ground level. The third party shall review ground conditions, vehicle types and crossing frequencies to determine the type and construction of the raft required.
- The type of raft shall be agreed with National Grid prior to installation.
- No protective measures including the installation of concrete slab protection shall be installed over or near to the National Grid pipeline without the prior permission of National Grid.
- National Grid will need to agree the material, the dimensions and method of installation of the proposed protective measure.
- The method of installation shall be confirmed through the submission of a formal written method statement from the contractor to National Grid.
- Please be aware that written permission is required before any works commence within the National Grid easement strip.
- A National Grid representative shall monitor any works within close proximity to the pipeline to comply with National Grid specification T/SP/SSW22.
- A Deed of Consent is required for any crossing of the easement

## Cables Crossing:

- Cables may cross the pipeline at perpendicular angle to the pipeline i.e. 90 degrees.
- A National Grid representative shall supervise any cable crossing of a pipeline.
- Clearance must be at least 600mm above or below the pipeline.
- Impact protection slab should be laid between the cable and pipeline if cable crossing is above the pipeline.
- A Deed of Consent is required for any cable crossing the easement.
- Where a new service is to cross over the pipeline a clearance distance of 0.6 metres between the crown of the pipeline and underside of the service should be maintained. If this cannot be achieved the service shall cross below the pipeline with a clearance distance of 0.6 metres.

## General Notes on Pipeline Safety:

- You should be aware of the Health and Safety Executives guidance document HS(G) 47 "Avoiding Danger from Underground Services", and National Grid's specification for Safe Working in the Vicinity of National Grid High Pressure gas pipelines and associated installations - requirements for third parties T/SP/SSW22.
- National Grid will also need to ensure that our pipelines access is maintained during and after construction.
- Our pipelines are normally buried to a depth cover of 1.1 metres however; actual depth and position must be confirmed on site by trial hole investigation under the supervision of a National Grid representative. Ground cover above our pipelines should not be reduced or increased.
- If any excavations are planned within 3 metres of National Grid High Pressure Pipeline or, within 10 metres of an AGI (Above Ground Installation), or if any embankment or dredging works are proposed then the actual position and depth of the pipeline must be established on site in the presence of a National Grid representative. A safe working method agreed prior to any work taking place in order to minimise the risk of damage and ensure the final depth of cover does not affect the integrity of the pipeline.
- Excavation works may take place unsupervised no closer than 3 metres from the pipeline once the actual depth and position has been confirmed on site under the supervision of a National Grid representative. Similarly, excavation with hand held power tools is not permitted within 1.5 metres from our apparatus and the work is undertaken with NG supervision and guidance.

To view the SSW22 Document, please use the link below:

<http://www2.nationalgrid.com/WorkArea/DownloadAsset.aspx?id=33968>

To view the National Grid Policy's for our Sense of Place Document. Please use the link below:

<http://www2.nationalgrid.com/uk/services/land-and-development/publications/>

To download a copy of the HSE Guidance HS(G)47, please use the following link:

<http://www.hse.gov.uk/pubns/books/hsg47.htm>

Further information in relation to in proximity to National Grid's apparatus can be found at:

<http://www2.nationalgrid.com/UK/Safety/Library/>

## **Further Advice**

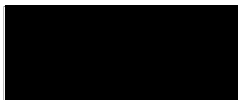
**We would request that the potential impact of the proposed scheme on National Grid's existing assets as set out above is considered in any subsequent reports, including in the Environmental Statement, and as part of any subsequent application.**

**Where it is intended to acquire land, extinguish rights, or interfere with any of National Grid apparatus protective provisions will be required in a form acceptable to it to be included within the DCO.**

**The information in this letter is provided notwithstanding any discussions taking place in relation to connections with electricity or gas customer transmission network services.**

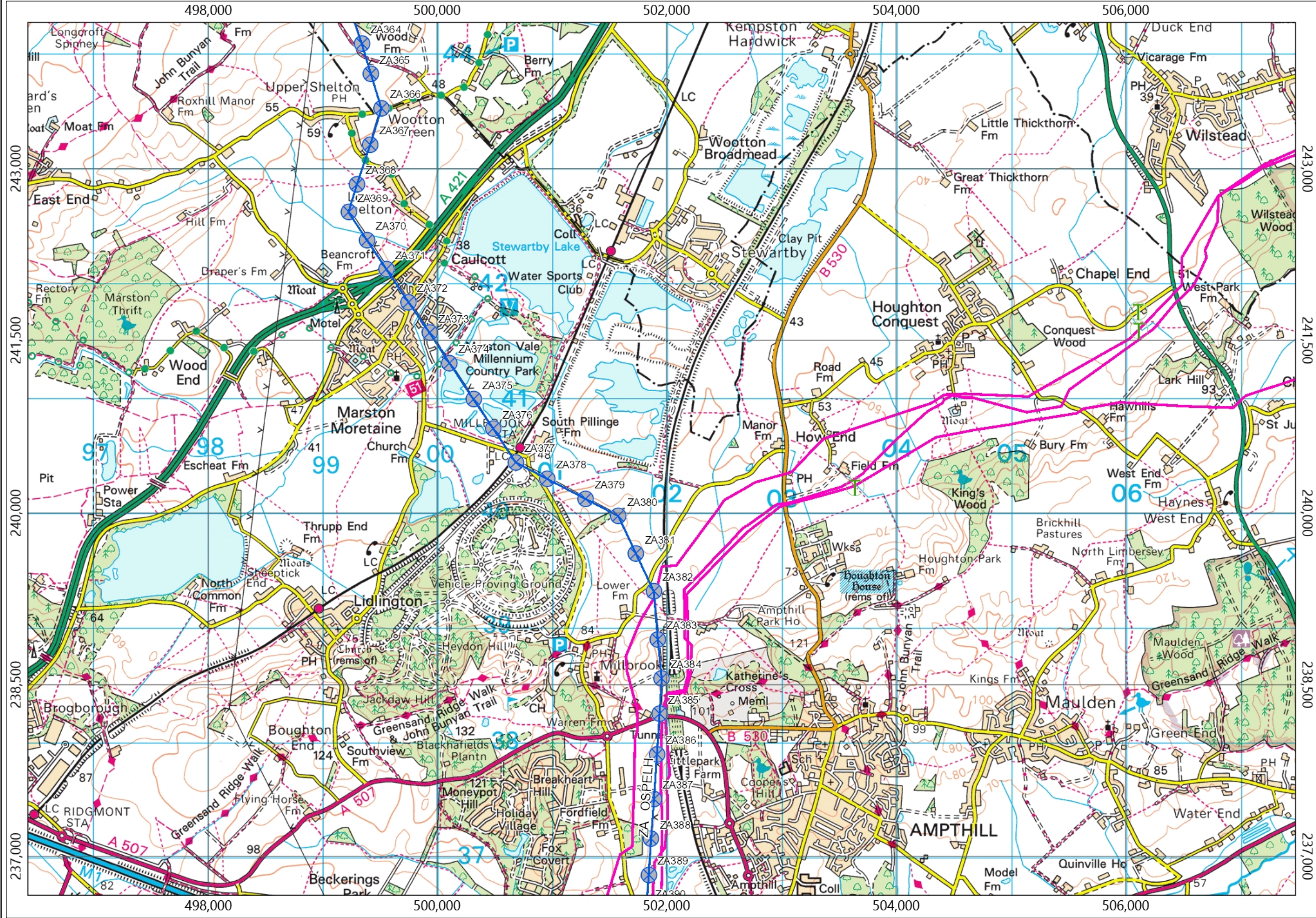
I hope the above information is useful. If you require any further information please do not hesitate to contact me.

Yours sincerely



**Nick Dexter.**



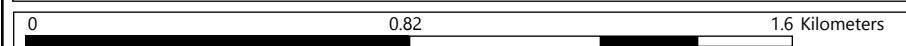


- Legend:**
- Substations Commissioned
  - OHL 400kV Commissioned
  - OHL 275kV Commissioned
  - OHL 132kV & Below Commissioned
  - Towers Commissioned
  - Buried Cable Commissioned
  - Fibre Cable Commissioned
  - Pilot Cable
  - Gas Operational Boundary
  - Gas Site Boundary
  - Block Valve
  - Compressor
  - LNG Site
  - Multijunction
  - Minimum Offtake
  - Future Minimum Offtake
  - Offtake
  - Pressure Reduction Installation
  - Pig Trap
  - Terminal
  - Transferred Offtake
  - Transformer Rectifier
  - Gas Pipe Feeder
  - Commissioned
  - Decommissioned Group
  - Planned and Spares

**Notes:**

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Note: Any sketches on the map are approximate and not captured to any particular level of precision.



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Note: Any sketches on the map are approximate and not captured to any particular level of precision.



Date: 06 July 2017  
Our ref: 216544  
Your ref: MPL/S42



Mr Dermot Scanlon  
Director, Peter Brett Associates LLP

[info@millbrookpower.co.uk](mailto:info@millbrookpower.co.uk)  
**BY EMAIL ONLY**

Customer Services  
Hornbeam House  
Crewe Business Park  
Electra Way  
Crewe  
Cheshire  
CW1 6GJ

T 0300 060 3900

Dear Mr Scanlon

**Section 42 Planning Act 2008 consultation:** Proposed gas fired power plant  
**Location:** Rookery South Pit, Nr.Millbrook, Bedfordshire

Thank you for your consultation which was received by Natural England on 22 May 2017.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

**Natural England advises that air quality impacts from the proposal will not impact upon King's Wood and Glebe Meadows Site of Special Scientific Interest (SSSI) or Coopers Hill SSSI. However, further information is required regarding protected species and soil and land quality.**

We understand that you are consulting us in line with paragraph 67 of the Planning Act 2008 "Guidance on pre-application consultation", and that further consultation may be required in line with paragraph 85, particularly if/when the draft Environmental Statement has been prepared. We also appreciate that this consultation under Section 42 of the Planning Act 2008 also encompasses consultation on the preliminary environmental information, and that some overlap exists between these various requirements. Natural England welcomes both formal and informal pre application consultation and refers you to [Annex C to the NID advice note 11](#).

We provided advice on 18 July 2014 (our ref: 124328) to the Secretary of State on the scope of the Environmental Impact Assessment (EIA) where we advised we were broadly happy with the approach outlined for the EIA. We also provided advice on an earlier version of the Preliminary Environmental Information Report (hereafter the 'PEIR') on 29 October 2014 (our ref: 133972, your ref: PGW/MPL). We now acknowledge receipt of the Section 48 Notice of proposed application for a Development Consent Order that you have provided. We have examined the PEIR (by Peter Brett Associates, Project Ref: 40335 Rev: 1.0, dated May 2017) and we provide further information in Annex A.

We would be happy to comment further through our [Discretionary Advice Service](#) should the need arise but if in the meantime you have any queries please do not hesitate to contact us. For any queries relating to the specific advice in this letter only please contact me on 0208 225 7685. For any new consultations, or to provide further information on this consultation please send your correspondences to [consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk).

We really value your feedback to help us improve the service we offer. We have attached a

feedback form to this letter and welcome any comments you might have about our service.

Yours sincerely

Steve Roe  
West Anglia Area Team

## Annex A – Additional information

### Designated Sites

#### *Air Quality*

In our advice of 29 October 2014 we advised that modelled process contributions for nearby SSSIs were required to determine whether there would be adverse impacts. The PEIR now provide values for the process contributions (PCs) at ecological receptors, including the two nearby SSSIs. The proposed power plant will result in the emission of oxides of nitrogen and we are aware that a Resource Recovery Facility (the Covanta waste incineration plant) is proposed nearby. We acknowledge at para 4.10.8 of the PEIR that a ‘worst case’ scenario assessment of the potential impacts from air quality has been undertaken. *Note that we have not checked the validity of the Covanta air quality data, only the cumulative modelling that you have undertaken.* We note that your assessment has used Air Pollution Information System <http://www.apis.ac.uk/> to determine existing nitrogen and acid deposition rates within the study area, and that the air quality assessment has used an appropriate ADMS 5 model (described in para 6.5.20 of the PEIR).

Volume D of the PEIR considers the potential impacts on King's Wood and Glebe Meadows SSSI and Coopers Hill SSSI as ecological receptors and uses air quality modelling to assess the impact of the proposal on the three habitat features of the two SSSIs. See our advice below on potential impacts to European Sites. Natural England is satisfied that there would not be any adverse effects to SSSIs through the construction or decommissioning stages: the main potential for impact to SSSIs would be through changes in air quality during operation of the power plant. In considering the operation of the power plant we note the results in Table A6 of pollutant concentrations and in Table A8 of nitrogen deposition and **we conclude that the proposal will not impact upon King's Wood and Glebe Meadows SSSI or Coopers Hill SSSI.** Our reasoning is because screening has indicated that the process contribution (PC) for all pollutants at all sites will be <1% of the relevant critical level or load for the most sensitive habitat at each site.

#### *European Sites*

We note that the Habitat Regulations Assessment: No Significant Effects Report (by Peter Brett Associates, Project Ref: 31116/001 Rev: AA, Dated March 2015) has been produced to record a Habitats Regulations assessment. We confirm our previous advice (email from Ross Holdgate on 2 March 2015) that there would be no likely significant effects to Chiltern Beechwoods Special Area of Conservation, Upper Nene Valley Gravel Pits Special Protection Area and Ramsar Site, either alone or in combination with other plans or projects.

### Protected Species

We note that Volume F Ecology contains the Herpetofauna Report dated 2 December 2014 and we understand that great crested newt (GCN) exclusion fence (that was part of the licence 2014-1762-EPS-MIT-1) as part of previous translocation work will remain on site until April 2018. We also understand from Hayley Scoffham (email dated 13 June 2017) that *“no material changes in the nature and extent of the habitats were identified during the survey, and no further survey requirements were identified to inform the DCO application.”* **We are concerned that if this fence is taken down before the DCO works commence then there is likelihood that GCNs may access the site. We require further information as to why it is considered that no further surveys for GCNs are required.** This echoes the guidance provided by the Secretary of State in the [Scoping Opinion of the Proposed Millbrook Power Project](#) (July 2014) at para 3.47 that *“ecological surveys should be thorough, up to date and take account of other developments proposed in the vicinity.”*

We also note the presence of other protected species including bats and badgers within the proposal area. Should the development involve a requirement for any protected species licences to be issued by Natural England it is important that the details are agreed with us at an early stage, to ensure that Letters of No Impediment can be issued with submission.

## Soils and Agricultural Land

Detailed information on Agricultural Land Classification (ALC) Grade is not supplied in the PEIR. Further, we note at para 5.7.7 of the [Environmental Impact Assessment Scoping Report](#) (dated June 2014, Doc Ref: Orbis P1078/04/01 Rev 10) that the vicinity of Rookery South Pit is located within agricultural fields classified as ALC Grade 3. In our previous advice of 29 October 2014 we recommended that *“that the area of agricultural land to be affected by the works is quantified”*. We understand from an email of 27 June 2017 from Hayley Scoffham of Peter Brett Associates that the following land areas are involved:

- *The Gas Connection is 6.25ha;*
- *The Electrical Connection is 19.07ha;*

We acknowledge that a certain area within the Gas Connection comprises the pipeline itself, and likewise within the Electrical Connection the cable itself, and that such areas will be re-instated after installation. Further we understand that the laydown area (~4ha) and the substation (~3ha) are sited in brownfield land (the base of the former clay pit). However, in order to assess the significance of the impact of the Gas and Electrical Connections, **Natural England recommends it is necessary to undertake an agricultural land quality and soil resources survey of the site – particularly any areas of land that will not be re-instated or are likely to suffer permanent loss.** This would identify whether best and most versatile land is affected and if so to what extent. The survey should also inform the methodology for soil handling during the works. To safeguard soil resources as part of the overall sustainability of the development, it is important that the soil is able to retain as many of its many important functions and services (ecosystem services) as possible through careful soil management.



To:  
Dermot Scanlon  
Director  
Peter Brett Associates  
33 Bowling Green Lane  
London  
EC1R 0BJ

From: Diane Clarke  
Network Rail,  
1<sup>st</sup> Floor  
Square One  
4 Travis Street  
Manchester  
M1 2NY  
Tel: 0161 880 3598  
[diane.clarke@networkrail.co.uk](mailto:diane.clarke@networkrail.co.uk)  
Date: 21<sup>st</sup> June 2017

Dear Dermot Scanlon

**Rookery South Pit, Millbrook, Bedfordshire**  
**DCO for Millbrook Power Station – gas-fired power station**  
**Drax Group PLC**  
**501373 / 240736**

Network Rail has the following comments to make on the above DCO proposal and development.

Network Rail has been consulted on the Millbrook Power Project, a proposal to develop a new gas power station on land to the east of the railway between Stewartby and Millbrook stations, in Bedfordshire. The project will be subject to a DCO application to be submitted in late 2017.

Whilst at this stage we do not believe that the proposal requires any Network Rail land/assets to be included within the red line boundary, it is highly likely that the proposed new access roads off Green Lane in Stewartby and Station Lane in Millbrook will have an impact on the 2 Level Crossings located on both these roads.

The information provided at this stage suggests that during construction there would be 78 HGV movements and 80 car movements per day. Some of the equipment would be large and potentially disruptive. During operation, the developer envisages approximately 5 employees plus maintenance visits. An annual month long maintenance outage would attract an additional 40 staff and 4 HGV movements daily for that period.

The report submitted to Network Rail for this consultation does not discuss or mention the potential impact on the level crossings of the proposal.

(1)  
In 2015, the Network Rail Level Crossings Manager for the area, was consulted on initial proposals and raised concerns that the entrance to the development was approximately 150 metres from Stewartby Green Lane Level Crossing. There was concern that the construction traffic could cause blocking back at the level crossing and discussions included traffic management control to mitigate any impacts from the construction phase. There was also a proposal to re-model a section of Green Lane where the new access road would join it.

- (a) The developer should continue to liaise with Network Rail's Level Crossing Manager to ensure that the construction works on site do not impact upon the safe operation and integrity of the Stewartby

Green Lane Level Crossing and Millbrook Level Crossing.

- (b) A good traffic management control scheme must be included within the construction works phase to remove any issues of blocking back due to the additional traffic and construction traffic generated by the proposal.
- (c) The developer should also consider the potential impacts of the proposal not only during construction but also once the proposal is up and running (should it be granted planning consent).

As the proposal progresses the impact of construction works on site and impacts from the proposal once in operation on Network Rail's level crossings should be considered within the Transport Assessment.

Any mitigation measures required at the level crossings would need to be fully funded by the developer and agreed with Network Rail.

An addendum to this letter includes a list of asset protection issues and measures to be actioned by the developer.

If you have any queries please do not hesitate to contact me.

Yours sincerely

**Diane Clarke AssocRTPI**  
Town Planning Technician LNW  
Network Rail  
Floor 1  
Square One  
4 Travis Street  
Manchester, M1 2NY  
Tel: 0161 880 3598

Enc.

## Asset Protection Appendix

Network Rail has the following comments on asset protection issues as the proposal is adjacent to the operational railway line.

(1)  
Network Rail's Asset Protection Engineer has already informed the developer that they have reviewed the new access road within the site, which runs adjacent to the railway boundary. The developer has been advised that there must be no disturbance to the operational railway infrastructure and that the developer will need to provide:

- suitable trespass proof fence of at least 1.8m in height
- directional column lighting
- adequate anti incursion barriers – especially in view of the increase in HGVs
- surface water drainage away from the railway boundary

(2)  
Network Rail has been advised that the developer may want to install an Under Track Crossing (UTX) – this would need to be agreed with Network Rail including any wayleaves etc.

(3)  
As the proposal includes works which may impact the existing operational railway and in order to facilitate the above, a BAPA (Basic Asset Protection Agreement) will need to be agreed between the developer and Network Rail. The developer will be liable for all costs incurred by Network Rail in facilitating this proposal, including any railway site safety costs, possession costs, asset protection costs / presence, site visits, review and agreement of proposal documents and any buried services searches. The BAPA will be in addition to any planning consent.

The applicant / developer should liaise directly with Asset Protection to set up the BAPA.

For major works / large scale developments an Asset Protection Agreement will be required with further specific requirements.

[AssetProtectionLNWSouth@networkrail.co.uk](mailto:AssetProtectionLNWSouth@networkrail.co.uk)





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F +44 (0) 1235 822614  
[www.gov.uk/phe](http://www.gov.uk/phe)

Dermot Scanlon  
Director  
Peter Brett Associates LLP  
33 Bowling Green Lane  
London EC1 0BJ

[info@millbrookpower.co.uk](mailto:info@millbrookpower.co.uk)

Your Ref: MPL/S42

19<sup>th</sup> September 2017

Dear Mr Scanlon,

**Re: Nationally Significant Infrastructure Project  
Millbrook Power Station, Rookery South Pit, Millbrook, Bedfordshire  
Section 42 Consultation**

Thank you for your consultation regarding the above development. Public Health England (PHE) welcomes the opportunity to comment on your proposals and preliminary environmental information report at this stage of the project

Our records indicate that we have replied to earlier consultations as listed below and this response should be read in conjunction with that earlier correspondence.

- Request for Scoping Opinion      17<sup>th</sup> July 2014
- Section 42                              14<sup>th</sup> November 2014

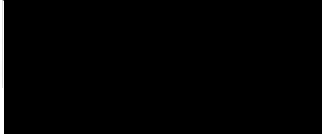
PHE has considered the submitted documentation and can confirm that we are broadly satisfied with the approach proposed for the preparation of the Preliminary Environmental Information Report (PEIR).

However, PHE notes that there is currently only a preliminary assessment of the potential impacts of electric and magnetic fields (EMFs). PHE will require the promoter to demonstrate that risks from EMFs have been fully considered and that any necessary risk assessment has been undertaken. Further information on the codes of practice in carrying out a full assessment can be found here:

<http://www.emfs.info/codes-practice-exposure-limits-uk/>

Should you have any questions or concerns please do not hesitate to contact us.

Yours sincerely



Nicholas Brooke  
Principal Environmental Public Health Scientist

[nsipconsultations@phe.gov.uk](mailto:nsipconsultations@phe.gov.uk)

*Please mark any correspondence for the attention of National Infrastructure Planning Administration*



## **Millbrook Power Station**

### **Response to statutory consultation under section 42 of the Planning Act 2008**

#### **Introduction**

Reference the letter from Peter Brett Associates on behalf of Millbrook Power Limited to Royal Mail dated 22 May 2017, Royal Mail's consultants BNP Paribas Real Estate have reviewed the Preliminary Environmental Information Report (PEIR) dated May 2017.

Royal Mail's consultation response is set out below. It is requested that Millbrook Power has due regard to this consultation response in progressing the Power Station proposal and forthcoming DCO application.

#### **Royal Mail – relevant information**

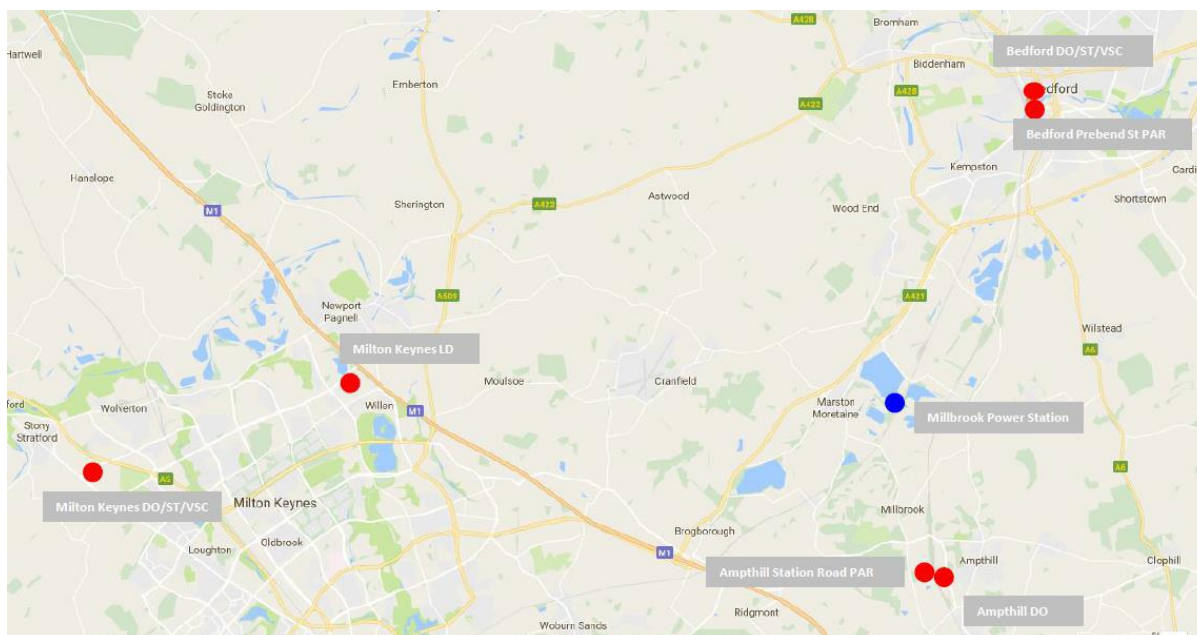
Royal Mail is responsible for providing efficient mail sorting and delivery nationally. As the Universal Service Provider under the Postal Services Act 2011, Royal Mail has a statutory duty to deliver mail to every residential and business address in the country as well as collecting mail from all Post Offices and post boxes six days a week.

Royal Mail's postal sorting and delivery operations rely heavily on road communications. Royal Mail's ability to provide efficient mail collection, sorting and delivery to the public is sensitive to changes in the capacity of the highway network.

Royal Mail is a major road user nationally. Disruption to the highway network and traffic delays can have direct consequences on Royal Mail's operations, its ability to meet the Universal Service Obligation and comply with the regulatory regime for postal services thereby presenting a significant risk to Royal Mail's business.

Royal Mail has a Delivery Office at Ampthill which is circa 3.1 miles from the proposed Millbrook Power Station and three other operational facilities within a 10 mile radius of the proposal site, as listed and shown on the plan below:

Ampthill Delivery Office	MK45 2QW	3.1 miles
Ampthill Vehicle Park	MK45 2RB	3.2 miles
Bedford Prebend Street Vehicle Park	MK42 9BX	7.8 miles
Bedford Delivery Office	MK40 1AA	9.0 miles
Milton Keynes Parcelforce	MK15 8HG	12.6 miles
Milton Keynes Delivery Office	MK11 3AA	17.4 miles



In exercising its statutory duties Royal Mail vehicles use on a daily basis all of the main roads that may potentially be affected by additional traffic arising from the construction of the proposed new Millbrook Power Station. In particular, the section of the A421 between junction 13 of the M1 Motorway and Bedford is of strategic importance to Royal Mail's services to Bedford and the surrounding area.

Royal Mail therefore wishes to ensure the protection of its future ability to provide an efficient mail sorting and delivery service to the public in accordance with its statutory obligations which may potentially be adversely affected by the construction of this proposed scheme.

#### **Comments / observations on the applicant's PEIR**

Royal Mail notes from the PEIR that following ES scoping consultations in 2014 and subsequent traffic surveys, Millbrook Power limited has prepared a TA and a draft Construction Environmental Management Plan (CEMP), with a Travel Plan to be prepared and submitted with the DCO application.

The PEIR indicates that the construction, operation and decommissioning of the proposed Power Station has potential to affect the local transport network through the generation of additional traffic movements to the area in the vicinity of the proposal site.

It is noted by Royal Mail that in addition to the CEMP, a contractor's Route Management Plan will be agreed at the detailed design stage of the project.

#### **Royal Mail's comments / requests:**

1. Royal Mail requests that the ES includes information on the needs of major road users (such as Royal Mail) and acknowledges the requirement to ensure that major road users are not disrupted through full advance consultation by the applicant at the appropriate time in the DCO and development process.



2. The ES should include detailed information on the construction traffic mitigation measures that are proposed to be implemented, including a draft Construction Traffic Management Plan (CTMP) in addition to the CEMP and Contractor's Route Management Plan.
3. Royal Mail requests that it is fully pre-consulted by Millbrook Power on any proposed road closures/ diversions/ alternative access arrangements, hours of working and the content of the CEMP, CTMP and the Contractor's Route Management Plan.

Royal Mail is able to supply the applicant with information on its road usage/ trips if required.

Should Millbrook Power Limited or Peter Brett Associates have any queries in relation to the above, then in the first instance please contact Jennifer Douglas ([jennifer.douglas@royalmail.com](mailto:jennifer.douglas@royalmail.com)) of Royal Mail's Legal Services Team or Daniel Parry-Jones ([daniel.parry-jones@bnpparibas.com](mailto:daniel.parry-jones@bnpparibas.com)) of BNP Paribas Real Estate.

**Francesca Rowson**

---

**From:** Francesca Rowson  
**Sent:** 17 October 2017 13:14  
**To:** Francesca Rowson  
**Subject:** FW: Proposed gas fired power plant at Rookery South Pit Nr Millbrook Bedfordshire

**From:** Shelia Moran [REDACTED]  
**Date:** 11 July 2017 at 13:18:39 BST  
**To:** "[dscanlon@peterbrett.com](mailto:dscanlon@peterbrett.com)" <[dscanlon@peterbrett.com](mailto:dscanlon@peterbrett.com)>  
**Subject:** Proposed gas fired power plant at Rookery South Pit Nr Millbrook Bedfordshire

Dear Mr Dermot Scanlon

I am aware I have missed the deadline for the public exhibitions and also the response date to the proposed project, This is unfortunate because I need more information on how this proposal relates to us???? Is it just courtesy to inform all in the surrounding area. or is our land specific to your proposal?? As you can gather I am not up to speed!!!

If you could update /inform me it would be appreciated

Regards  
Shelia J Moran

Sent from my iPad

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## Francesca Rowson

---

**From:** Francesca Rowson  
**Sent:** 17 October 2017 11:28  
**To:** Francesca Rowson  
**Subject:** Joanne Gray (s42-162)

**From:** joanne gray [REDACTED]  
**Sent:** 22 September 2017 11:53 AM  
**To:** Info Millbrook <[info@millbrookpower.co.uk](mailto:info@millbrookpower.co.uk)>  
**Subject:**

All I request is that if I require access to our field we would be allowed

Regards  
Jo

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Ministry  
of Defence

# Defence Infrastructure Organisation

Safeguarding Department  
Statutory & Offshore

Millbrook Power Ltd  
49, York Place  
Edinburgh  
EH1 3JD

Defence Infrastructure Organisation  
Kingston Road  
Sutton Coldfield  
West Midlands  
B75 7RL

Tel: +44 (0)121 311 3818 Tel (MOD): 94421 3818

Fax: +44 (0)121 311 2218

E-mail: [DIO-safeguarding-statutory@mod.uk](mailto:DIO-safeguarding-statutory@mod.uk)

[www.mod.uk/DIO](http://www.mod.uk/DIO)

22 June 2017

Your Reference: MPL/S42

Our reference: 10040406

Dear Sir/Madam

## **MOD Safeguarding – SITE OUTSIDE SAFEGUARDING AREA (SOSA)**

**Proposal:** New Open Cycle Gas Turbine power peaking plant

**Location:** Rookery South Pit, Near Millbrook, Bedfordshire

**Grid Ref:** 501373, 240734

Thank you for consulting Defence Infrastructure Organisation (DIO) on the above proposed development. This application relates to a site outside of Ministry of Defence safeguarding areas. I can therefore confirm that the Ministry of Defence has no safeguarding objections to this proposal.

I trust this adequately explains our position on this matter.

Yours sincerely

Debbie Baker

## Morina Benjamin

---

**Subject:** FW: Ref MPL/S42 Proposed gas fired power plant at Rockery South Pit, Nr Millbrook.  
**Attachments:** image001.png

---

**From:** Stevens Sarah [<mailto:Sarah.Stevens@scambs.gov.uk>]  
**Sent:** 01 June 2017 04:09 PM  
**To:** Info Millbrook <[info@millbrookpower.co.uk](mailto:info@millbrookpower.co.uk)>  
**Subject:** Ref MPL/S42 Proposed gas fired power plant at Rockery South Pit, Nr Millbrook.

Thank you for your consultation letter and information relating to the above proposal. Having liaised with officers within Planning & New Communities and in view of the location of the development the Council does not wish to make any comment at this time.

Yours sincerely,

Sarah Stevens | Interim Head of Development Management



South Cambridgeshire Hall | Cambourne Business Park | Cambourne | Cambridge | CB23 6EA  
e: [sarah.stevens@scambs.gov.uk](mailto:sarah.stevens@scambs.gov.uk)  
[www.scambs.gov.uk](http://www.scambs.gov.uk) | [facebook.com/south-cambridgeshire](https://facebook.com/south-cambridgeshire) | [twitter.com/SouthCambs](https://twitter.com/SouthCambs)

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SGN  
Gas Control  
St Lawrence House  
Station Approach  
Horley RH6 9HJ

Peter Brett Associates LLP  
33 Bowling Green Lane,  
London  
EC1R 0BJ

22 May 2017

Dear Sir

**Millbrook Power Station, Rookery South Pit, Millbrook, Bedfordshire; Your reference; MPL**

With reference to your consultation document of 16 May 2017 for a gas fired power station at Millbrook, Bedfordshire. SGN as a gas transportation company do not hold a licence which covers this part of Bedfordshire. As such we have no observations or comments relevant to this project.

Yours sincerely

  
Roger Crane  
Gas Control Manager

**PLANNING & BUILDING CONTROL**  
Tracy Harvey – Head of Planning & Building Control

**Our Ref:** 5/2017/1523  
**Your Ref:** MPL/S42  
**Please ask for:** Gillian Donald  
**Telephone:** 01727 816000  
**E-mail:** planning@stalbans.gov.uk  
**Date:** 13 June 2017

Peter Brett Associates Ltd  
33 Bowling Green Lane  
London  
EC1R 0BJ

**F.A.O. Mr D Scankon**

Dear Sir,

**Consultation by Peter Brett Associates under Section 42 of the Planning Act 2008**

**Proposal:** Proposed gas fired power plant

**At:** Rookery South Pit Green Lane Stewartby Bedfordshire

I refer to your letter dated 22 May 2017 concerning the application referred to above.

I would advise you that St Albans City & District Planning Authority has no comment on the proposed development.

Yours sincerely

A black rectangular redaction box covering the signature of Tracy Harvey.

**Tracy Harvey**  
**Head of Planning and Building Control**

## Morina Benjamin

---

**From:** Morina Benjamin  
**Sent:** 19 October 2017 15:03  
**To:** Morina Benjamin  
**Subject:** Millbrook Power

---

**From:** Jane Hennell [<mailto:Jane.Hennell@canalrivertrust.org.uk>]  
**Sent:** 30 June 2017 09:36  
**To:** Info Millbrook <[info@millbrookpower.co.uk](mailto:info@millbrookpower.co.uk)>  
**Subject:** Millbrook Power

Thank you for your consultation on the proposed Gas powered generating plant at Rookery Pit Near Stewartby, Bedfordshire.

The site is not in close proximity to any canal owned or managed by the Canal & River Trust although it is close to the route of the proposed new Bedford to Milton Keynes waterway.

The Canal & River Trust have considered this proposal and have no comments to make at this time. However please continue to consult the Canal & River Trust on this proposal in the future as any additional information or changes may require further consideration and comment by us.

Jane Hennell MRTPI  
Area Planner South

The Canal & River Trust  
The Dock Office  
Commercial Road  
Gloucester  
GL1 2EB

Tel. 07747 897793

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Mae'r e-bost hwn a'i atodiadau ar gyfer defnydd y derbynnydd bwriedig yn unig. Os nad chi yw derbynnydd bwriedig yr e-bost hwn a'i atodiadau, ni ddylech gymryd unrhyw gamau ar sail y cynnwys, ond yn hytrach dylech eu dileu heb eu copïo na'u hanfon ymlaen a rhoi gwybod i'r anfonwr eich bod wedi eu

derbyn ar ddamwain. Mae unrhyw farn neu safbwynt a fynegir yn eiddo i'r awdur yn unig ac nid ydynt o reidrwydd yn cynrychioli barn a safbwyntiau Glandŵr Cymru.

Elusen newydd yw Glandŵr Cymru sy'n gofalu am 2,000 o filltiroedd o ddyfrffyrdd yng Nghymru a Lloegr. Cymerwch ran, ymunwch â ni - Ewch i Rhoddion a Gwirfoddoli yn [www.glandwrcymru.org.uk](http://www.glandwrcymru.org.uk)

Mae Glandŵr Cymru yn gwmni cyfyngedig drwy warant a gofrestrwyd yng Nghymru a Lloegr gyda rhif cwmni 7807276 a rhif elusen gofrestredig 1146792. Swyddfa gofrestredig: First Floor North, Station House, 500 Elder Gate, Milton Keynes MK9 1BB.

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Authority

Resolving the **impacts** of mining

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[www.gov.uk/coalauthority](http://www.gov.uk/coalauthority)

Mr D. Scanlon – Director  
Peter Brett Associates LLP

[By Email: [info@millbrookpower.co.uk](mailto:info@millbrookpower.co.uk)]

28 June 2017

Dear Mr Scanlon

**Proposed gas fired power plant at Rookery South Pit, Nr Millbrook, Bedfordshire  
Development Consent Order**

**Planning Act 2008 (as amended) Section 42**

Thank you for your consultation letter of 22 May 2017 seeking the pre-application views of the Coal Authority on the above.

The Coal Authority Response:

I have reviewed the proposals and can confirm that this proposed Nationally Significant Infrastructure Project would be located outside of the defined coalfield.

Accordingly, I can confirm that the Coal Authority has **no comments or observations to make** on this proposal.

As this proposal lies outside of the defined coalfield, in accordance with Regulation 3 and Schedule 1 of the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 it will not be necessary for any further consultations to be undertaken with the Coal Authority on this Nationally Significant Infrastructure Project. This letter can be used by the applicant as evidence for the legal and procedural consultation requirements.

Yours sincerely

*Mark Harrison*

**Mark E. N. Harrison** *B.A.(Hons), DipTP, LL.M, MInstLM, MRTPI*

**Principal Manager – Planning & Local Authority Liaison**



Peter Brett Associates LLP  
33 Bowling Green Lane  
London  
EC1R 0BJ

**Our ref:** AC/2017/125803/01-L01  
**Your ref:** MPL/S42  
**Date:** 12 June 2017

Dear Sir/Madam

**MILLBROOK POWER LIMITED: STATUTORY CONSULTATION UNDER  
SECTION 42 OF THE PLANNING ACT 2008  
ROOKERY SOUTH PIT, NR. MILLBROOK, BEDFORDSHIRE**

Thank you for your letter regarding the above mentioned site, which was received on 22 May 2017. We have reviewed the information as submitted and wish to make the following comments.

We strongly recommend that you consider the parallel tracking of this proposed Development Consent Order (DCO) and Environmental Permit applications for this project to give us the opportunity of identifying any key issues of concern and to enable these to be clarified at the earliest opportunity.

**Documents Reviewed**

1. Peter Brett Associates, Millbrook Power Project Preliminary Environmental Information Report, Project Reference: 40335 Revision 1, May 2017
2. Peter Brett Associates, Millbrook Power Project Preliminary Environmental Information Report (2017) - Figures, Project Reference: 40335 Revision 1, May 2017
3. Peter Brett Associates, Millbrook Power Project Preliminary Environmental Information Report (2017) - Appendices Volume H Ground Conditions, Project Reference: 40334 Revision 1, May 2017
4. Millbrook Power Limited, Millbrook Power Project Environmental Impact Assessment Report, Document Reference: Orbis P1078/04/01 Rev 10, June 2014

**Site Specific Comments**

The site is located entirely within Flood Zone 1 (lowest probability of flooding) on our Flood Map. The site is underlain by the solid bedrock geology of the Oxford Clay Formation (unproductive strata). This geological strata is underlain by the Kellaways Sand (Secondary A Aquifer) and Blisworth Limestone Formation (Principal Aquifer). A small part of the western area of the site overlies a Secondary A Aquifer in the alluvium superficial deposits. Secondary aquifers are permeable geological strata capable of supporting water supplies at a local rather than strategic scale, and often form an important source of base flow to rivers, wetlands and lakes and private water supplies in rural areas.

According to the site investigation works, as documented in the report no.1, groundwater beneath the site is shallow (lying within 5 metres) in the strata directly beneath the site. The overlying soils across the site are classified as having a wide range (low to high) of leaching potentials, meaning they can readily transmit a wide variety of pollutants to the groundwater. Various streams, surface water drains, ponds and lakes are located on the site and adjacent to the site.

The site is considered to be of moderate sensitivity and could present potential pollutant/contaminant linkages to controlled waters.

### **Flood Risk and Surface Water Drainage**

Please contact the Lead Local Flood Authority (LLFA) and the Internal Drainage Board (IDB) for drainage advice.

### **Land Contamination and Groundwater Protection**

We understand that potentially contaminative activities, including landfilling and industrial works for the manufacture of electrical equipment and the use of the site for brickmaking, have previously been undertaken at the site. Furthermore, the site lies adjacent to a brickworks site, a landfill and railway lines.

We understand from report no.3 above and Figure 2 (Site Layout and Exploratory hole Location Plan) of the report that extensive site intrusive investigation works have been carried out at the site. From the results of groundwater and surface water testing, we understand that elevated concentrations of Extractable Petroleum Hydrocarbons (EPH) and polyaromatic hydrocarbons (PAHs) were detected in BH206 from a groundwater sample collected from the Kellaways Sands Secondary A Aquifer. The report concludes that the elevated EPH concentrations are due to entrained sediment content that has originated from the organic rich Oxford Clay. Based on the known previous site uses, we would require robust lines of evidence to discount anthropogenic activities being the source of the identified contamination. Therefore, we welcome the proposed Phase 2 geo-environmental intrusive investigation in the 'Generating Equipment Area' of the site. Furthermore, we require a better understanding of the sensitivity, and a suitable risk assessment, of the Secondary A and Principal Aquifers beneath the site.

We noted that Appendix 4 of the of report No.3 only includes select borehole and trial pit logs. We would require borehole logs for all of the trial pits and boreholes which were installed during the site investigation works.

Based on the identified low risk of the proposed development to controlled waters in the 'Electrical Connection Area' of the site, it has been proposed that further works are not required in this area. We are in agreement with this proposed approach. Depending on the outcome from the proposed works in the 'Generating Equipment Area', we may require additional site investigation works to provide robust lines of evidence that the risks to controlled waters are low.

We are in agreement with the proposed groundwater and surface water monitoring programme that is proposed for the site.

We recommend that any information collected is used to inform the Site Condition Report which would support any permit application(s) at this site.

## **Piling**

Piling or other ground penetrative methods could have an adverse impact on the groundwater quality within the Principal Aquifer and Secondary A Aquifers beneath the site or provide preferential pathways for contaminant migration to the aquifer during construction and after the completion of the development. A Foundation Works Risk Assessment (FWRA) will need to be produced to determine the risks to the underlying aquifers from proposed possible piled foundations.

## **Infiltration Sustainable Drainage Systems (SuDS)**

We understand that due to the ground conditions of the site, that infiltration SuDS are not being considered as part of the proposed development. If this is not the case then you should be aware that we will require a risk assessment for any infiltration systems that are proposed. We recommend that information from the intrusive site investigation works be used to inform any risk assessment. Please refer to our general advice (below) with regards to infiltration drainage:

- Infiltration sustainable drainage systems (SuDS) such as soakaways, unsealed porous pavement systems or infiltration basins shall only be used where it can be demonstrated that they will not pose a risk to the water environment.
- Infiltration SuDS have the potential to provide a pathway for pollutants and must not be constructed in contaminated ground. They would only be acceptable if a phased site investigation showed the presence of no significant contamination.
- Only clean water from roofs can be directly discharged to any soakaway or watercourse. Systems for the discharge of surface water from associated hard-standing, roads and impermeable vehicle parking areas shall incorporate appropriate pollution prevention measures and a suitable number of SuDS treatment train components appropriate to the environmental sensitivity of the receiving waters.
- The maximum acceptable depth for infiltration SuDS is 2.0 m below ground level, with a minimum of 1.2 m clearance between the base of infiltration SuDS and peak seasonal groundwater levels.
- Deep bore and other deep soakaway systems are not appropriate in areas where groundwater constitutes a significant resource (that is where aquifer yield may support or already supports abstraction).
- SuDS should be constructed in line with good practice and guidance documents which include the SuDS Manual ([CIRIA C753](#), 2015) and the [Susdrain website](#).

For further information on our requirements with regard to SuDS see our groundwater protection position statements, in particular Position Statements G1 and G9 to G13 available at: <https://www.gov.uk/government/publications/groundwater-protection-position-statements>

## **Pollution Prevention**

At this stage of the process there is limited information on the surface water and foul sewage disposal for both the proposed Power Station and the Laydown Area to be used during construction. We would wish to see more information in this respect.

- A separate Consent may be required from us for any proposed trade or sewage effluent discharge to a watercourse or other controlled waters (or to soakaway if notice has been given by us of "relevant prohibition") under the provisions of Schedule 10 of the Water Resources Act 1991. Controlled water includes stream, underground waters, reservoirs, estuaries and coastal waters. This would also include the 'Laydown Area'.
- Prior to being discharged into any watercourse, surface water sewer or soakaway system, all surface water drainage from lorry parks and/or parking areas for fifty car park spaces or more and hardstandings should be passed through an oil interceptor designed compatible with the site being drained. Roof water shall not pass through the interceptor.
- Prior to being discharged into any watercourse, surface water sewer or soakaway system, all surface water drainage from parking areas for less than fifty spaces and hardstandings should be passed through trapped gullies with an overall capacity compatible with the site being drained.
- For more general information on pollution prevention can be obtained from the government website at <https://www.gov.uk/guidance/pollution-prevention-for-businesses>

## **Waste**

Reference has been made to local planning policies. The policies contained in these strategies should be used as a clear reference point, to ensure waste is managed sustainably and legally. We would refer the applicant to the Construction Code of Practice for the Sustainable use of Soils on Construction

Sites: [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/69308/pb13298-code-of-practice-090910.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/69308/pb13298-code-of-practice-090910.pdf). There is further guidance on sustainable construction available on the Waste and Resources Action Programme website: [www.wrap.org.uk](http://www.wrap.org.uk)

## **Water Resources**

The development lies within the area traditionally supplied by Anglian Water Services Ltd. It is assumed that water will be supplied using existing sources and under existing abstraction licence permissions. Advice should be sought from the water company to find out whether this is the case, or whether a new source needs to be developed or a new abstraction licence is sought. We may not be able to recommend a new or increased abstraction licence where water resources are fully committed to existing abstraction and the environment.

The timing and cost of infrastructure improvements will be a consideration. This issue should be discussed with the water company.

We supports all initiatives aimed at reducing water use. The extent of water efficiency measures adopted will affect the demand for water for the development and I would expect that this will be taken into consideration. It is assumed that new

houses will be constructed with water meters fitted. Other water saving measures that we wish to see incorporated include low flush toilets, low flow showerheads, water butts for gardens etc. We support the idea of greywater recycling as it has the potential to reduce water consumption in the average household by up to 35%. This must, however, be achieved in a safe and hygienic manner.

It is the responsibility of the applicant to ensure that no local water features (including streams, ponds, lakes, ditches or drains) are detrimentally affected, this includes both licensed and unlicensed abstractions. If the proposal requires an abstraction licence, it is recommended that the applicant contact the local Environment Agency Office. Depending on water resources availability a licence may not be able to be granted.

## **ENVIRONMENTAL PERMITTING (ENGLAND AND WALES) REGULATIONS 2016**

### **Regulation**

The development proposal is at an early stage and as such only limited information has been provided so far. The applicant is advised to refer to The Environmental Permitting (England and Wales) Regulations 2016 (EPR), Schedule 1, Part 2, Chapter 1, Section 1.1 Combustion Activities:

<http://www.legislation.gov.uk/ukxi/2016/1154/made>

The operator will need to ensure that a suitable environmental permit is in place before commencement of operations. This proposal has no current permit and we recommend that the applicant commences pre-application discussions for a permit as soon as is practicable by contacting the local Combustion Sector Lead within the East Anglia Installations Team. Guidance on applying for a new environmental permit or varying an existing environmental permit can be found at:

<https://www.gov.uk/topic/environmental-management/environmental-permits>

### **Permit Application**

Our determination of an environmental permit application will address a number of key areas, including:

- Management: - including general management, accident management, energy efficiency, efficient use of raw materials and waste recovery
- Operating activities and techniques: - including the use of Best Available Techniques for process design and management;
- Emission Monitoring EN14181 requirements;
- Secondary and Tertiary containment;
- Combined Heat and Power;
- Carbon capture and Sequestration (if applicable);
- Eels and Fish Passage Management (if applicable);
- Emissions to air and discharges to water, land and groundwater along with odour, noise and vibration;
- Information: - monitoring, records, reporting and notifications.

The applicant will need to demonstrate the use of Best Available Techniques (BAT). BAT is required to be considered in order to avoid or reduce emissions resulting from

certain installations and to reduce the impact on the environment as a whole. Use of BAT is required by us when licensing the major potentially polluting industries under the Environmental Permitting Regulations 2016.

When determining the application for a permit to operate we will set conditions to ensure the emissions and discharges are at a level that will not result in significant impact on people and the environment, reflecting current statutory requirements and to ensure compliance with European Directive 2010/75/EU on Industrial Emissions. We cannot grant a permit until we are satisfied that the operation of the process will not cause significant pollution to the environment or harm to human health in isolation or in combination with relevant neighbouring emission sources. We note that Millbrook Power Limited has engaged with Covanta, the operator of the proposed Energy from Waste plant, and is developing its DCO application for the Project in such a way as to allow both schemes to co-exist.

For the purposes of a permit application we expect the applicant to refer to the BAT Reference conclusion document for large combustion plants that was adopted by the Article 75 Committee of the European Commission on the 28 April 2017 which this application will be assessed against when it is published later this year. Current BAT guidance can be viewed at: <http://eippcb.jrc.ec.europa.eu/reference>

### **Parallel Tracking**

You may wish to consider parallel tracking the DCO and permit applications for this project to give us the opportunity of identifying any key issues of concern and to enable these to be clarified at the earliest opportunity. We feel it is important to clarify that whilst the applicant is permitted to make applications sequentially (there is no legal requirement not to do so), our future responses to planning enquiries may be limited.

It should be noted that an EPR application would include a more detailed technical assessment of operation of the installation than might be provided for the DCO response. The future submission for a permit under EPR may require alterations and amendments to the current project proposal which we currently cannot foresee. This is one of the reasons why parallel tracking of applications may be of benefit. This approach can help to reduce uncertainty as to whether the activity is likely to be permitted, which in turn can reduce uncertainty and promote faster decision making for both planning and permitting applications. Our guidance on development requiring both planning permission and environmental permits can be found at: <https://www.gov.uk/government/publications/developments-requiring-planning-permission-and-environmental-permits>

### **Energy Efficiency and Cooling**

Although we recognise that this proposal is for an open cycle plant, and will operated as peaking plant, we expect energy efficiency to form a significant part of your application to ensure that operations will take into account BAT for this type of combustion plant.

### **Air Quality Assessment**

The operation of the power station will result in the emission of oxides of nitrogen and oxides of carbon. Air Quality assessment and its impact on any relevant Air Quality Management Areas (AQMA) will be completed during a permit determination of the relevant air quality modelling files. We suggest that the operator clarifies the scope of any air quality modelling that will be completed for the DCO with the



Combustion Lead for the Installations Team as BAT requirements on Energy Efficiency will have to be taken into account along with in combination (cumulative) impacts from other relevant emission sources such as the proposed Energy from Waste plant.

### **Combined Heat and Power (CHP) Readiness**

We require all new combustion power plants (that do not include CHP from the outset) to be CHP-ready to a sufficient degree dictated by the likely future technically- viable opportunities for heat supply in the vicinity of the plant.

Environmental permit applications for closed cycle, base load, gas turbines would require the need to include a Best Available Technique (BAT) assessment for CHP-readiness, for which we have produced a guidance note: - 'CHP Ready Guidance for Combustion and Energy from Waste Power Plants' V1.0 February 2013:

<https://www.gov.uk/government/publications/energy-efficiency-for-combustion-and-energy-from-waste-power-plants>

As a result peaking plant will be required to demonstrate why more efficient plant have not been identified as BAT and may be operationally limited, through a permit condition, to a maximum number of hours per annum if considered BAT for this mode of operation.

### **Carbon Capture Readiness**

The Carbon Capture Readiness (Electricity Generating Stations) Regulations 2013 require that Carbon Capture Readiness (CCR) to be assessed during the consenting process and that no new power station at or over 300MWe will be consented unless it can be demonstrated to be carbon capture ready. We would require confirmation that the maximum electrical output from this plant would not meet this threshold.

The CCR requirements at the application stage include demonstration that there is sufficient space, it is technically and economically feasible to retrofit the chosen technology and that transport and storage of CO<sub>2</sub> is feasible. Full details of these requirements are in 'Carbon Capture Readiness (CCR). A guidance note for Section 36 of the Electricity Act 1989 consent applications. DECC, URN 09D/810 November 2009'. This will be assessed by the Environment Agency when submitted if the above threshold is crossed. [https://ukccsrc.ac.uk/system/files/publications/ccs-reports/DECC\\_CCS\\_133.pdf](https://ukccsrc.ac.uk/system/files/publications/ccs-reports/DECC_CCS_133.pdf)

It should be noted that we are only able to comment on the suitability of the space set aside on or near the site for carbon capture equipment and the technical feasibility of the retrofitting carbon capture equipment. As explained in paragraph 94 of the DECC CCR guidance we are not the public body to comment on the technical aspects of the transport and storage of CO<sub>2</sub> off site, nor can we comment on the soundness of the economic feasibility of the CCS proposal. However, we will require further information, if required, to be submitted as part of the EPR permit application to allow us to assess the project to determine that there are no foreseeable barriers to the technical feasibility of CCR retrofit.

The submission of the above mentioned information as part of the DCO application may address any uncertainties over whether amendments to the project would be required post DCO determination if an EPR permit application is not determined in parallel



Should you wish to discuss this matter further please do not hesitate to contact me.

Yours faithfully

**Neville Benn**  
**Principal Planning Advisor**  
**Sustainable Places**  
Direct dial 0203 0251906  
Direct e-mail [neville.benn@environment-agency.gov.uk](mailto:neville.benn@environment-agency.gov.uk)



CEMHD Policy - Land Use Planning  
NSIP Consultations  
Building 2.2  
Redgrave Court  
Merton Road  
Bootle  
Merseyside  
L20 7HS

HSE email: [NSIP\\_applications@hse.gov.uk](mailto:NSIP_applications@hse.gov.uk)

Millbrook Power Ltd  
49 York Place  
Edinburgh  
EH1 3JD

Dear Sir/Madam,

23 June 2017

**Section 42 Planning Act 2008: Statutory Consultation  
Proposed Gas Fired Power Plant - Rookery South Pit, Nr Millbrook**

Thank you for your letter of 22nd May 2017 consulting the Health and Safety Executive (HSE) under Section 42 of the Planning Act 2008 for the proposed gas fired power plant at Rookery South Pit, near Millbrook.

**HSE's land use planning advice**

Will the proposed development fall within any of HSE's consultation distances?

According to HSE's records, there are no major accident hazard installations that would impact on the infrastructure project. The proposed development gas connection pipeline will fall within the consultation zones of the following major accident hazard pipelines:

- The inner, middle and outer CZs of the 7 Feeder Old Warden/Slapton MAHP operated by National Grid Gas PLC (HSE Ref: 7592 / TRANSCO Ref: 1846);
- The inner, middle and outer CZs of the 9 Feeder Huntingdon/Whitwell MAHP operated by National Grid Gas PLC (HSE Ref: 7594 / TRANSCO Ref: 1848); and
- The inner, middle and outer CZs of the 26 Feeder Willington/Steppingley MAHP operated by National Grid Gas PLC (HSE Ref: 9945 / TRANSCO Ref: 2722).

Furthermore, given the proposal to install a new gas connection pipeline to link the Proposed Development with the existing NTS Feeder 9 Huntingdon/Whitwell, a Pipeline Safety Regulations Notification may be required (see <http://www.hse.gov.uk/pipelines/notification.htm>).

Would Hazardous Substances Consent be needed?

The presence of hazardous substances on, over or under land at or above set threshold quantities (Controlled Quantities) may require Hazardous Substances Consent (HSC) under the Planning (Hazardous Substances) Act 1990 as amended. The substances, alone or when aggregated with others, for which HSC is required, and the associated Controlled Quantities, are set out in The Planning (Hazardous Substances) Regulations 2015.

Hazardous Substances Consent would be required if the site is intending to store or use any of the Named Hazardous Substances or Categories of Substances and Preparations at or above the controlled quantities set out in schedule 1 of these Regulations.

Further information on HSC should be sought from the relevant Hazardous Substances Authority for the proposed development.

#### Explosives sites

The proposed development does not impinge on the separation distances of any explosives licensed site in the vicinity of the application; therefore we have no comment to make in this regard.

#### **Electrical Safety**

No comment from a planning perspective.

Any further electronic communication on this project can be sent directly to the HSE's designated e-mail account for NSIP applications the details of which can be found at the top of this letter.

Alternatively, hard copy correspondence should be sent to:

Mr Dave Adams (MHPD)  
NSIP Consultations  
2.2 Redgrave Court  
Merton Road, Bootle  
Merseyside, L20 7HS

Yours faithfully,



Dave Adams

## Morina Benjamin

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**Subject:** FW: Proposed gas fired power plant at Rookery South Pit, Nr Millbrook

---

**From:** Gloria Hall [<mailto:Gloria.Hall@wwutilities.co.uk>]  
**Sent:** 25 May 2017 10:16 AM  
**To:** Millbrook Power <[info@millbrookpower.co.uk](mailto:info@millbrookpower.co.uk)>  
**Subject:** Proposed gas fired power plant at Rookery South Pit, Nr Millbrook

Dear Sir

Thank you for sending over details of the proposed gas fired power plant at Rookery South Pit, Nr Millbrook, but this is out of our companies operating area, we have no comments.

Kind regards

On behalf of Paul Millar, Company Secretary

**Gloria Hall | PA to CEO**

Phone | 02920 278543 | 07875 410659

Wales & West Utilities Ltd | Wales & West House | Spooner Close | Newport | NP10 8FZ

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Darren Burbeary  
Development Management Officer  
T: 01933 231862  
E: [planning@wellingborough.gov.uk](mailto:planning@wellingborough.gov.uk)

Dermot Scanlon  
Peter Brett Associates LLP  
33 Bowling Green Lane  
London  
EC1R 0BJ

Date: 20 June 2017

Your Ref:

Our Ref: WP/17/00327/EXT

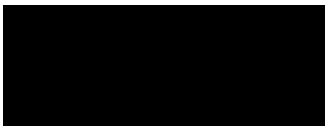
Dear Mr Scanlon

**TOWN AND COUNTRY PLANNING ACT 1990**

**Proposal: Regulation 11 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2009 (the "EIA Regulations 2009") at Millbrook Power Station Rookery South Pit Millbrook Bedfordshire.**

No objections are raised at this second consultation stage. The applicant should be advised that Council will review this position once the scheme has been finalised and details of the findings of the completed Environmental Impact assessment are known

Yours faithfully,



Julie Thomas  
Director



# Delegated Report

Printed: 8 June 2017

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Case Officer **Darren Burbeary**

**WP/17/00327/EXT**

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Date received	Date valid	Overall Expiry	Ward	Parish
<b>17 May 2017</b>	<b>17 May 2017</b>	<b>7 June 2017</b>		

**Applicant** Millbrook Power Limited (MPL)

**Agent** Dermot Scanlon

**Location** Millbrook Power Station, Rookery South Pit, Millbrook, Bedfordshire.

**Proposal** Regulation 11 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2009 (the "EIA Regulations 2009").

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## PLANNING HISTORY

None relevant

## THE SITE AND SURROUNDINGS

The site comprises two large former clay pits, known as Rookery North and Rookery South Pits which are separated by an east-west spine of unexcavated clay. The area is designated as Rookery Clay Pits County Wildlife Site (CWS).

The pits are approximately 3km north of Ampthill, and 7km south west of Bedford situated in the Marston Vale. The nearest villages to the site are Stewartby (400m to the north), Millbrook (400m to the south), Houghton Conquest (1.5km to the north east) and Marston Moretaine 1.2km to the west) in Bedfordshire. Railway lines extend along both the east and west site boundaries.

The majority of the application site is within the boundary of Central Bedfordshire Council. However, a section of the northern boundary is within Bedford Borough Councils administrative area.

Road access to the site is currently from the north near Stewartby via the A421, Bedford Road and Green Lane. There is a junction on Green Lane leading to an access track on land on the western side of Rookery North Pit which extends southwards into Rookery South Pit and the generating equipment site. The gas and electrical connections would either be primarily accessed from Junction 13 of the M1 via the A507, Sandhill Close, Houghton Lane, Millbrook Road and the B530 Ampthill Road or from Bedford Road, via Woburn Road, Manor Road, B530 Ampthill Road and Millbrook Road depending on their locations. There are overhead power lines that run west to east south of Rookery South Pit.

Rookery South Pit which is approximately 95 ha is bounded by steep clay banks that are varied in nature and substrate. The pit base currently includes a range of wetland habitats, including open water, reed beds, pools and bare inundated clay with ephemeral water bodies. The land that remains at the original ground level, approximately 42 m above ordnance datum (AOD) around the periphery of The Rookery South Pit is predominantly bare ground that has been cleared of vegetation.

The Rookery is currently the subject of an ongoing low level restoration scheme by



the landowner. Once restored, Rookery South Pit will be approximately 15 m below the surrounding ground level in the vicinity of part of the site proposed to accommodate the generating equipment and laydown area.

## **BACKGROUND AND THE APPLICATION PROPOSAL**

The proposal development would consist of gas powered generation plant and underground connections to the national electricity and gas networks. It is stated that the plant will be capable of generating up to 299MW of electricity. This is equivalent of providing power to 150,000 household per year.

The Power Generation Plant site and part of the gas and electrical connections would be situated on land within former clay pits designated as Rookery Clay Pits County Wildlife Site (CWS). Other parts of the gas and electrical connections would extend beyond the pits on to farmland to the either the south and/or east. As part of the scheme a stack is proposed that would be 35m high. This has been reduced from 60m (originally proposed in 2014).

The project is classified as a nationally significant project under the Planning Act 2008.

An initial phase of statutory consultation was undertaken during October/November 2014 and informal consultation during June 2014. The project was put on hold in 2015. A second phase of consultation is now being undertaken extending from May until early July. The applicant has stated that their intention is to submit an application for a Development Consent Order in the latter part of 2017.

## **NATIONAL GUIDANCE, DEVELOPMENT PLAN POLICY AND SUPPLEMENTARY PLANNING DOCUMENTS/GUIDANCE:**

National Planning Policy Framework (NPPF)  
Infrastructure Planning (Environmental Impact Assessment) Regulations 2009  
Conservation of Habitats and Species Regulations 2010 (as amended)  
The Natural Environmental and Rural Communities Act 2006  
Wildlife and Countryside Act 1981 (as amended)  
Planning Practice Guidance  
Bedford Borough, Central Bedfordshire and Luton Borough Councils: Minerals and Waste Local Plan Strategic Sites and Policies (adopted January 2014)  
Development Strategy for Central Bedfordshire 2014  
The Bedford Borough Council Core and Rural Issues Plan (2021)

## **SUMMARY OF REPLIES TO CONSULTATIONS/REPRESENTATIONS RECEIVED**

Wellingborough Borough Council is a consultee only on this application and, therefore, no consultations have been carried out on this application by the Borough.

## **ASSESSMENT AND REASONED JUSTIFICATION**

The proposed development is a schedule 1 development as defined by the EIA Regulations. As a scoping opinion was requested from the Secretary of State under the EIA Regulations 2009, before the commencement of the EIA Regulations 2017 it means that in accordance with the transitional arrangements at Regulation 37(2)(a)(ii) that the EIA 2009 regulations will apply.

Although details of the preferred layout of the power generation plant have been identified the final location and layout are yet to be determined.

Another company was granted a Development Consent Order in 2011 for a separate project to be operated from part of the existing application site. The

existing permitted development is an energy resource recovery facility. This allows municipal, commercial and non-hazardous industrial waste residual waste, left after recycling and composting as fuel to generate 50MW of heat and electricity. This consent has been implemented.

The applicant has stated that both companies are working closely together to enable both schemes to co-exist. At this stage no specific details as to how this would happen have been provided.

The preliminary findings of the studies undertaken by the applicant indicate that the key impacts are transport, air quality, visual impact, effects on culture and heritage, local ecology. It is considered all the potential key impacts issues have been identified in order to guide the decision making process to finalise the design to and produce an Environmental Impact Assessment to accompany the application.

Based on the general information provided relating to the design, layout and location of the development, it is not considered that the proposal would not give rise to any material planning considerations relevant to this council's administrative area.

## **CONCLUSION**


It is concluded that no objections are raised at this second consultation stage. The applicant should be advised that Council will review this position once the scheme has been finalised and details of the findings of the completed Environmental Impact assessment are known.

## **RECOMMENDATION**

No objections are raised at this second consultation stage. The applicant should be advised that Council will review this position once the scheme has been finalised and details of the findings of the completed Environmental Impact assessment are known

## **Informative/s**

1. In accordance with the provisions in the Town and Country Planning (Development Management Procedure) (England) Order 2015 and pursuant to paragraphs 186 and 187 of the National Planning Policy Framework, where possible and feasible, either through discussions, negotiations or in the consideration and assessment of this application and the accompanying proposals, the council as the local planning authority endeavoured to work with the applicant/developer in a positive and proactive way to ensure that the approved development is consistent with the relevant provisions in the framework.

Assistant Principal Development Management Officer	
Date	15/06/17

## Morina Benjamin

---

**From:** Morina Benjamin  
**Sent:** 19 October 2017 15:04  
**To:** Morina Benjamin  
**Subject:** Millbrook Power Limited

**From:** Trevor Skelding [<mailto:Trevor.Skelding@idbs.org.uk>]  
**Sent:** 04 July 2017 13:44  
**To:** Info Millbrook <[info@millbrookpower.co.uk](mailto:info@millbrookpower.co.uk)>  
**Subject:** Millbrook Power Limited

**MILLBROOK POWER LTD: Proposed gas fired power plant at Rookery South Pit, Nr. Millbrook, Bedfordshire**

**Statutory Consultation under Section 42 of the Planning Act 2008.**

On the basis that the pumped discharge rate for surface water from Rookery Pit into Millbrook Brook will remain unchanged i.e. maintains the status quo and does not increase flows into Stewartby Lake, the proposal is acceptable.

Regards

Trevor Skelding MSc IEng MICE  
Principal Engineer

Bedford Group of Drainage Boards | Vale House | Broadmead Road | Stewartby | Bedfordshire | MK43 9ND

Tel: 01234 767995 | Fax: 01234 768582 | [www.idbs.org.uk](http://www.idbs.org.uk)

The Bedford Group is a consortia of the Bedfordshire and River Ivel Internal Drainage Board, the Buckingham and River Ouzel Internal Drainage Board and the Alconbury and Ellington Internal Drainage Board.

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## **Appendix 5.D: Phase 1 Section 42 statutory consultation respondents' comments and the MPL response**

Theme	No. of Comments	Summary of Comments	Consultee	Regard had to response in MPL ES and / or DCO Application
<b>Site Selection</b>	<b>1</b>	One comment states that consideration of alternatives is widely regarded as good practice; this begins with site selection so that the environmental merits of practicable alternatives can be properly considered and outlined in the ES.	Public Health England	<p>Chapter 5 of the ES (Document Reference 6.1) outlines alternatives considered including site selection. A detailed feasibility assessment has been undertaken looking at areas that were capable of meeting the following strategic project development criteria:</p> <ul style="list-style-type: none"> <li>▪ Acceptable proximity to the national gas transmission system &amp; the national electricity transmission system or local distribution networks;</li> <li>▪ Located within areas that are net importers of electricity;</li> <li>▪ Compatible land use designation/s; and</li> <li>▪ Sufficient distance from sensitive environmental receptors such that significant environmental effects from the Project are not likely.</li> </ul>
<b>Consultation</b>	<b>11</b>	One comment states that it is important to consult with Cranfield Airport regarding aerodrome safeguarding to establish their concerns.	Civil Aviation Authority	MPL contacted Cranfield Aerodrome no comment was received showing any concern.

Theme	No. of Comments	Summary of Comments	Consultee	Regard had to response in MPL ES and / or DCO Application
		One comment states that the Ministry of Defence should be consulted regarding military aviation.	Civil Aviation Authority	MPL has consulted with the Ministry of Defence and no adverse comment received.
		One comment states that the local emergency services air support units should be consulted regarding their unique operating altitudes and potential unusual landing sites.	Civil Aviation Authority	<p>MPL has consulted with local emergency services, including:</p> <ul style="list-style-type: none"> <li>■ Bedfordshire Fire and Rescue;</li> <li>■ East of England Ambulance Service; and</li> <li>■ Office of the Police and Crime Commissioner for Bedfordshire.</li> </ul> <p>No concerns have been raised.</p>
		<p>Seven comments state that liaison with stakeholders and the Local Authority should be carried out regarding the following:</p> <ul style="list-style-type: none"> <li>■ Noise, odour, vermin and dust nuisance</li> <li>■ Site investigation and remediation</li> <li>■ Air Quality Management Areas</li> <li>■ Human health and impact of pollutant deposition on crops</li> </ul>	Public Health England	<p>Consultation with the relevant stakeholders and Local Authority has been undertaken for the following:</p> <ul style="list-style-type: none"> <li>■ Noise as documented within Table 7.1 of the ES (Document Reference 6.1);</li> <li>■ Dust nuisance and Air Quality Management Areas as documented within Table 6.1 of the ES (Document Reference 6.1);</li> </ul>

Theme	No. of Comments	Summary of Comments	Consultee	Regard had to response in MPL ES and / or DCO Application
		<ul style="list-style-type: none"> <li>■ Flood risk, surface and ground water</li> <li>■ Waste characterisation and acceptance</li> <li>■ Wider public health</li> </ul>		<ul style="list-style-type: none"> <li>■ Site investigation and remediation as documented within Table 10.1 of the ES (Document Reference 6.1); and</li> <li>■ Flood risk, surface and groundwater as documented within Table 9.1 of the ES (Document Reference 6.1).</li> </ul> <p>Human health, waste characterisation and acceptance has been considered with the ES (Document Reference 6.1) as outlined within Chapter 15. These environmental impacts have been investigated as a result of concerns raised by statutory consultees during the EIA process.</p> <p>Odour, vermin and pollutant deposition on crops have not been considered as a result of liaison with stakeholders and Local Authorities.</p>
		One comment requests a copy of a site plan that overlays the current MPL proposed project with the Covanta EfW project	Covanta RRF	MPL have been in discussion with Covanta regarding the issue of boundaries and overlapping DCO limits. Both parties are working towards agreeing protective provisions for one another.



Theme	No. of Comments	Summary of Comments	Consultee	Regard had to response in MPL ES and / or DCO Application
<b>Community Benefit</b>	1	One comment states they would welcome further discussions regarding MPL's willingness to contribute toward local community projects.	Marston Moretaine Parish Council	The proposed Heads of Terms agreement (Document Reference 10.3) proposes an Education and Employment Scheme as well as a Local Services Scheme.
<b>Environmental Impact Assessment (EIA)</b>	9	One comment states Table 8.3 of the PEIR does not assess the impacts of lighting during operation. Lighting could have an impact on receptors such as bats and should be considered as part of the EIA.	Natural England	Lighting has been considered within Chapter 8 of the ES (Document Reference 6.1), which states that the lighting scheme associated with the operation of the Power Generation Plant has been sensitively designed to minimise potential impacts on bats. An Outline Lighting Strategy is included as an appendix to the ES (Document Reference 6.2, Appendix 11.4) and explains that the guiding principle will be to maintain a 'dark site'.
		One comment states that potential impacts of the proposed scheme on NG existing assets needs to be considered in the Environmental Statement	National Grid	MPL has included within its DCO protective provisions for the benefit of National Grid.
		One comment states that a continuous dialogue regarding the EIA is needed with the council and with other groups and organisations with a view to ensuring the best possible development proposal and the minimisation of any environmental impacts	BBC	The EIA has been informed through the production of the Scoping Report (Document Reference 6.1 Appendix 1.2) and the PEIR. Both documents have been consulted on with the Local Authorities and statutory consultees.

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		Public Health England state that they are generally satisfied with the proposed methodology. They would expect to see that the detailed quantitative and cumulative assessments proposed are undertaken and provided.	Public Health England	The detailed quantitative and cumulative assessments have been undertaken within the ES (Document Reference 6.1).
		One comment states that the EIA should give consideration to best practice guidance such as the Government's Good Practice Guide for EIA	Public Health England	Section 2.6 of the ES (Document Reference 6.1) sets out the guidance used within the EIA including the Government's Good Practice Guide for EIA.
		One comment states that the ES should clearly identify the development's location and the location and distance from the development of off-site human receptors that may be affected by emissions from, or activities at, the development. Off- site human receptors may include people living in residential premises; people working in commercial, and industrial premises and people using transport infrastructure (such as roads and railways), recreational areas, and publicly-accessible land. Consideration should also be given to environmental receptors such as the surrounding land, watercourses, surface and groundwater, and drinking water	Public Health England	Both human and environmental receptors have been identified within the relevant ES Chapters. Within the ES (Document Reference 6.1) Figure 6.1 identifies human health receptors, Figure 7.1 identifies noise sensitive receptors and Figure 8.1 identifies ecological sensitive receptors.

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		supplies such as wells, boreholes and water abstraction points		
		One comment states that whilst screening of impacts using qualitative methodologies is common practice where it is possible to undertake a quantitative assessment of impacts then this should be undertaken.	Public Health England	Quantitative assessments have been undertaken where possible as part of the EIA and are documented within the ES (Document Reference 6.1). These include Air Quality (Chapter 6), Noise (Chapter 7), Transport (Chapter 12) and Socio-Economic (Chapter 14).
		One comment states that the EIA should include consideration of the COMAH Regulations (Control of Major Accident Hazards) and the Major Accident Off-Site Emergency Plan (Management of Waste from Extractive Industries) (England and Wales) Regulations 2009: both in terms of their applicability to the installation itself, and the installation's potential to impact on, or be impacted by, any nearby installations themselves subject to these Regulations.	Public Health England	Neither the Project or other nearby developments constitute a COMAH or Major Accident Off-Site Emergency Plan Site and therefore this topic has not received further consideration.
		One comment states that a full assessment of any impacts of the project should be undertaken within the EIA.	CBC	A full EIA has been undertaken and is reported in the ES (Document Reference 6.1).
<b>Electrical Connection</b>	<b>3</b>	One comment asks if the electrical connection will affect the Grand Union Canal	The Canal & River Trust	The proposed electrical connection does not cross or come within close proximity of the Grand Union Canal.

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		One comment requests that a minimum number of pylons be used in consideration of the size of the development	Marston Moretaine Parish Council	MPL held an outreach meeting with PINS on 26 <sup>th</sup> November 2014 in order to discuss the Project and specific issues including taking into account the comments expressed during the statutory consultation phase, and as a result of feedback received at the outreach meeting and during parallel discussions with National Grid, MPL confirmed its intention to disregard both overhead line options and pursue the favoured alternative underground cable option.
		One comment states that the EIA should explore the use of underground cabling rather than overhead pylons, if this is not feasible then the possibility of the minimum number of pylons should be demonstrated and what mitigation is proposed on or off site.	CBC	MPL held an outreach meeting with PINS on 26 <sup>th</sup> November 2014 in order to discuss the Project and specific issues including taking into account the comments expressed during the statutory consultation phase, and as a result of feedback received at the outreach meeting and during parallel discussions with National Grid, MPL confirmed its intention to disregard both overhead line options and pursue the favoured alternative underground cable option.
<b>Socio-economics</b>	<b>1</b>	One comment states that Figure 1.2 from the PEIR shows a redline boundary that cuts across Millbrook Proving Grounds engineering centre, this area is used	Millbrook Proving Ground	A meeting was held with Millbrook Proving Ground to address this concern. The meeting minutes' states that the comment was more of a

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		<p>extensively for the development of vehicles for the transportation and automotive sector, some of these vehicles are sensitive and confidential and must be kept in a secure environment. There does not seem to have been due consideration for this element during your project planning phase which may result in significant economic detriment to our business which has not been included in your socio-economic investigation, this will need to be addressed.</p>		<p>statement that more work needs to be done to consider the impacts for the proving ground.</p> <p>MPL agreed to get a more detailed schedule for the construction program to the Proving Ground ASAP once NG have come back on a number of queries. An outline program of construction was emailed on 22<sup>nd</sup> February 2015 to Millbrook Vehicle Proving Ground.</p>
<b>Noise</b>	<b>7</b>	<p>One comment states that noise levels during operation should be within reasonable levels in all working conditions. This includes times when doors masking the noise are open.</p>	Marston Moretaine Parish Council	<p>Chapter 7 of the ES (Document Reference 6.1) assesses operational noise from the Project and states within Table 7.14 that the significance of the impact is slight and therefore not significant.</p>
		<p>Two comments states that Section 7 of the PEIR takes no account taken of any impact on footpath users as Noise Sensitive Receptors (NSR)</p>	BBC and CBC	<p>As stated in Table 7.1 of the ES (Document Reference 6.1) there is no known methodology for assessing the impact on footpath users. In addition, the temporary nature of construction and/or decommissioning works, the intermittent nature of the operation of the Power Generation Plant and the temporary nature of users passing the</p>

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				Site signify that a significant impact is unlikely to occur.
		One comments states that BS4142:1997, has been referred to, has been revoked and BS4142:2014 has been published. The scope of this standard has now been clarified and the assertion in 7.2.21 is no longer valid. I would therefore expect to see an assessment undertaken in line with this standard and look to achieve Central Bedfordshire Councils targets in this regard.	CBC	As stated in Table 7.1 of the ES (Document Reference 6.1) guidance from BS4142:2014 will be used where appropriate. It should be noted that the council do not have targets which correlate industrial/commercial noise to the NPPF, NPSE or EN-1.
		One comment states that mitigation in Section 7.3 could be subject to enhancements/additions based on the full noise assessment. It is suggested that the full noise assessment to quantify any noise generation, results compared and analysed against the appropriate methodology which will in turn inform any mitigation/design/siting proposals to ensure adequate protection for any sensitive receptors as set out in the PEIR.	CBC	<p>Embedded mitigation is identified in Section 3.6 of the ES (Document Reference 6.1) has been included in the noise model. Further mitigation is proposed in Section 7.9 of the ES (Document Reference 6.1) this includes the following for the Power Generation Plant:</p> <ul style="list-style-type: none"> <li>■ Detailed design will ensure that noise is mitigated as far as possible, through the Project Site layout and consideration of the orientation of plant items associated with higher sound power levels; and</li> <li>■ Inherently quiet plant items will be selected wherever practicable</li> </ul> <p>Acoustic lagging and low noise trims</p>

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				will be fitted to all pipe-work and noise generating valves.
		One comment states that Table 7.15 of the PEIR suggests that there are no NSR's along the access road, from work on the Covanta project it came to light that there is a camp site in this vicinity used by the sailing club which should be considered.	CBC	This location has been considered in Chapter 7 of the ES (Document Reference 6.1) as stated in Table 7.1.
		One comment references that paragraph 7.5.6 of the PEIR states that the operation of the gas above ground installation produces a 'low hum'. Whilst it is appreciated that there is some distance to the nearest receptor this low frequency noise needs to be quantified/clarified.	CBC	The ES (Document Reference 6.1) concludes that the significance of the noise impact from the Gas Connection during operation and maintenance will be neutral, not significant.
<b>Air Quality</b>	<b>22</b>	Natural England are satisfied that there would be no adverse Air Quality impact on SSSI's through the construction and decommissioning phase of the development.	Natural England	MPL notes this comment.
		One comment states that they are concerned about Air Quality impact on SSSI during the operational phase of the development. Table 6.10 of the PEIR states that the nitrogen and acid deposition are unlikely to be significant for ecological receptors. The PEIR does not provide values for the process contributions at specific ecological receptors. Natural	Natural England	Chapter 6 of the ES (Document Reference 6.1) states in Table 6.14 that the significance of effect on Ecological receptors is insignificant. These ecological receptors include King's Wood and Glebe Meadows, Houghton



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		England will need to see the modelled process contributions for nearby SSSIs to be confident there will be no adverse impacts.		Conquest SSSI and Coopers Hill, Bedfordshire SSSI.
		One comment states that evidence is required of independent verification that will substantiate that emissions will be safe and that the chimneys height is correct.	Marston Moretaine Parish Council	Section 6.3 of the ES (Document Reference 6.1) sets out the consultation that has been undertaken with regards to the methodology and assessment process. Comments have been received and the assessment has made use of the guidance held within the referenced EPUK document, as well as guidance published by the Environment Agency for the assessment of impacts to air.
		One comment is concerned over the inversion that can occur locally in Marston Vale	Marston Moretaine Parish Council	The proposed technology choice for the Generating Equipment (simple cycle gas turbines) result in a release of exhaust gases from the stack(s) which is at an extremely high temperature (around 450°C) and high pressure. This ensures that although the actual height of the stacks is 30-35m, the effective chimney height (top of the emissions release) is many times higher (of the order of hundreds of metres). Therefore, no issues with temperature inversions are anticipated as the exhaust gases would be able to penetrate any inversion layers. Chapter 6 of the ES (Document Reference 6.1)

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				explains that the meteorological data used to carry out dispersion modelling was taken from a local weather station.
		One comment states that any assessment of impacts arising from emissions due to construction and decommissioning should consider potential impacts on all receptors and describe monitoring and mitigation during these phases. Construction and decommissioning will be associated with vehicle movements and cumulative impacts should be accounted for.	Public Health England	Emissions arising during the construction and decommissioning phases of the Project have been assessed within the Air Quality Chapter 6 of the ES (Document Reference 6.1), Section 6.7 states that dust deposition and elevated PM <sub>10</sub> concentrations are the main potential air quality effects during these periods. In addition, emissions of NO <sub>x</sub> can occur from road traffic and equipment used on site. Table 6.14 states the significance of air quality effects during construction and decommissioning to be not significant.
		One comment states that the project should follow best practice guidance during all phases from construction to decommissioning to ensure appropriate measures are in place to mitigate any potential impact on health from emissions (point source, fugitive and traffic-related).	Public Health England	The Outline Construction Environmental Management Plan (Document Reference 6.2, Appendix 4.1) outlines best practice to be followed during the construction and decommissioning phase to ensure appropriate mitigation is in place.  Chapter 6 of the ES (Document Reference 6.1) explains the measure that will be taken to mitigate impacts on sensitive receptors due to emissions

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				during operation of the Project, for example and adequately sized stack.
		One comment states that there should be a robust mechanism in place to respond to any complaints of traffic-related pollution, during construction, operation, and decommissioning of the facility.	Public Health England	An Outline Construction Environmental Management Plan is set out within (Document Reference 6.2, Appendix 4.1) that acts as the mechanism to deal with construction related impacts.
		<p>Twelve comments state that the baseline, assessment and future monitoring should include:</p> <ul style="list-style-type: none"> <li>■ Appropriate screening assessments and detailed dispersion modelling where this is screened as necessary</li> <li>■ Encompass all pollutants which may be emitted by the installation in combination with all pollutants arising from associated development and transport, ideally these should be considered in a single holistic assessment</li> <li>■ The construction, operational, and decommissioning phases</li> <li>■ The typical operational emissions and emissions from start-up, shut-down, abnormal operation and accidents when</li> </ul>	Public Health England	<p>The baseline air quality assessment has been undertaken as part of the EIA and is reported in Section 6.6 of the ES (Document Reference 6.1). Future monitoring will be enforced through an Environmental Permit. More detail regarding the twelve points raised is outlined below:</p> <ul style="list-style-type: none"> <li>■ Section 6.5 of the ES (Document Reference 6.1) outlines the methodology undertaken for the air quality assessment that includes dispersion modelling. CBC and BBC screening assessments have helped inform the baseline within Section 6.6;</li> <li>■ Throughout the air quality assessment, the construction,</li> </ul>

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		<p>assessing potential impacts and include an assessment of worst-case impacts</p> <ul style="list-style-type: none"> <li>■ Account for fugitive emissions</li> <li>■ Consideration of local authority, Environment Agency, Defra national network, and any other local site-specific sources of monitoring data</li> <li>■ Appropriate estimates of background levels</li> <li>■ Compare predicted environmental concentrations to the applicable standard or guideline value for the affected medium (such as UK Air Quality Standards and Objectives and Environmental Assessment Levels)</li> <li>■ Consider impacts on residential areas and sensitive receptors (such as schools, nursing homes and healthcare facilities) in the area(s) which may be affected by emissions, this should include consideration of any new receptors arising from future development</li> <li>■ Consideration of impacts on existing areas of poor air quality e.g.</li> </ul>		<p>operational and decommissioning phases have been assessed;</p> <ul style="list-style-type: none"> <li>■ Section 6.4 sets out the worst case scenario that has been assessed;</li> <li>■ Within the assessment in Table 6.14 the effects duration is quantified from 0-1 year, 1-5years or 5-15 years;</li> <li>■ Local and National monitoring data has been used within the assessment. Monitoring data locations are listed in Table 6.8 and 6.9;</li> <li>■ Background concentrations are listed in Table 6.9;</li> <li>■ Section 6.2 lists the legislation and policy context that have been considered in the assessment; this includes the Air Quality Strategy 2007 that sets National Air Quality Objectives that are set out in Table 6.2 and 6.3;</li> <li>■ Residential receptors have been identified within the assessment and are listed in Section 6.6;</li> </ul>

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		<p>existing or proposed local authority Air Quality Management Areas (AQMA)</p> <ul style="list-style-type: none"> <li>■ Include modelling using appropriate meteorological data (i.e. come from the nearest suitable meteorological station and include a range of years and worst case conditions)</li> <li>■ Include modelling taking into account local topography</li> </ul>		<ul style="list-style-type: none"> <li>■ The nearest AQMA to the Project Site is within Bedford, approximately 10 km northeast of the Project Site. The AQMA, declared primarily on the basis of traffic-related NO<sub>2</sub>, covers an area of the town centre including the High Street and Prebend Street. It is considered that emissions from the Power Generation Plant will not impact significantly on this AQMA;</li> <li>■ The meteorological data used for this modelling exercise was that from the station at Cranfield; it is considered that this data will be representative of the conditions experienced at the Generating Equipment Site as it lies approximately 6km away. The data period considered was 2009-2013 inclusive as per current EA guidelines for the need to use recent meteorological data over five consecutive years; and</li> <li>■ Terrain effects generally occur when ground levels change by more than 1 in 10. A terrain file was created to account for the change in levels in</li> </ul>

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				the vicinity of the Generating Equipment Site.
		One comment states that if no standard or guideline value exists, the predicted exposure to humans should be estimated and compared to an appropriate health-based value (a Tolerable Daily Intake or equivalent).	Public Health England	The ES (Document Reference 6.1) Section 6.5 states that in the case of combustion of natural gas in a power station, the main pollutants are NO <sub>x</sub> and Carbon Monoxide (CO). There are objectives for both these pollutants; these are listed in Table 6.2.
		One comment states that consideration of aspects such as the deposition of chemicals emitted to air and their uptake via ingestion need to be considered.	Public Health England	Section 6.7 of the ES (Document Reference 6.1) considers impacts to human and ecological receptors including deposition of nitrogen. Ground level concentrations are also considered.
		One comment states that the EIA should appraise and describe the measures that will be used to control both point source and fugitive emissions and demonstrate that standards, guideline values or health-based values will not be exceeded due to emissions from the installation.	Public Health England	The EIA considers both point source and diffuse emissions within the air quality assessment. The methodology and results are provided in Chapter 6 of the ES (Document Reference 6.1)
<b>Landscape</b>	<b>16</b>	One comment states that the reduction in height of the chimney to 40m will result in an improvement visually.	Marston Moretaine Parish Council	MPL notes this comment

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		One comment states that if a landscaping scheme is proposed as part of the proposal, NG request that only slow and low growing species of trees and shrubs are planted beneath and adjacent to existing OHL.	National Grid	A Landscape and Ecology Mitigation and Management Strategy (LEMMS) is included as an appendix to the ES (Document Reference 6.1, Appendix 11.3). This has due regard to guidelines on planting adjacent to and underneath overhead power lines. Parts of the final planting plan affecting NGG and NGET assets would be produced in consultation with both organisations prior to implementation.
		One comment states that the EIA must evaluate the merits/impacts of alternative stack numbers, heights and diameters on the landscape.	BBC	Section 11.4 of the ES (Document Reference 6.1) identifies the worst case scenario for assessment is a single Turbine Generator and a stack of between 32.5 and 35m in height.
		One comment states the net increase of 6 electricity transmission pylons is likely to have an adverse effect on the local landscape.	BBC	MPL held an outreach meeting with PINS on 26 <sup>th</sup> November 2014 in order to discuss the Project and specific issues including taking into account the comments expressed during the statutory consultation phase, and as a result of feedback received at the outreach meeting and during parallel discussions with National Grid, MPL confirmed its intention to disregard both overhead line options and pursue the favoured alternative underground cable option.



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		<p>One comment states that the proposed pylons prominence in the landscape might result in an impact that is at least as significant as the generating plant itself. An assessment of visual impacts should include consideration of the impacts of the development in its entirety and include the pylons.</p>	BBC	<p>MPL held an outreach meeting with PINS on 26<sup>th</sup> November 2014 in order to discuss the Project and specific issues including taking into account the comments expressed during the statutory consultation phase, and as a result of feedback received at the outreach meeting and during parallel discussions with National Grid, MPL confirmed its intention to disregard both overhead line options and pursue the favoured alternative underground cable option.</p>
		<p>One comment states that the LVIA is not as comprehensive as required for a development of this nature. The Zone of Visual Influence has been limited to a 5km radius - whilst this area will experience the greatest change, the impact over 10km would highlight the communities which would be affected by the proposal. The ZVI diagram Fig 11.1 does not differentiate between the visibility of the vertical features and the built form of the plant and substation.</p>	CBC	<p>Table 11.1 of the ES (Document Reference 6.1) states the ZTV represents the visibility of the Project based on the maximum height of 35m for the stack (the tallest element on the Power Generation Plant Site). Given that MPL have taken the decision to use an underground electrical connection only, one ZTV has been produced based on the maximum stack height of 35 m.</p>
		<p>One comment states that it would be preferable to have a conventional ZTVI map showing visual impact of these different aspects over a wider area.</p>	CBC	<p>Table 11.1 of the ES (Document Reference 6.1) states the ZTV represents the visibility of the Project based on the maximum height of 35m for the stack (the tallest element on the Power Generation Plant Site). Given</p>

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				that MPL have taken the decision to use an underground electrical connection only, one ZTV has been produced based on the maximum stack height of 35 m.
		<p>Three comments states that the viewpoints chosen are appropriate, but further viewpoints should be assessed, these include some short distance views from the Country Park, Millbrook village and Ampthill Park House as well as these six suggested views:</p> <ol style="list-style-type: none"> <li>1. From the eastern boundary of the Millennium Country Park</li> <li>2. From footpath 14</li> <li>3. From Pillinge Farm</li> <li>4. A view looking across the development with the Greensand ridge as the back ground.</li> <li>5. The view from London Lane, Houghton Conquest</li> <li>6. From Houghton Conquest - including footpaths 3 or 10</li> </ol>	CBC	The viewpoint from the eastern boundary of the Millennium Country Park was agreed and added to the LVIA by MPL. The other suggested viewpoints were not incorporated within the assessment because it was considered that other viewpoints already assessed were representative of those suggested.
		One comment states that the report acknowledges that additional winter survey work is required to test visibility. This would then inform the assessment of visual effects.	CBC	Chapter 11 of the ES (Document Reference 6.1) assesses both summer and winter scenarios. Photomontages (Document Reference 7.1) have been

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				produced in both summer and winter to support this assessment.
		One comments states that the montages that are currently available highlight the intrusive nature of the transmission towers. Although there is a line of pylons already (one of which would be removed) and the railway catenary, these structures are considered to be detracting features, particularly in the view from the Ridge.	CBC	Following consultation responses received MPL has taken the decision to pursue an underground electrical connection to mitigate the visual impact of transmission towers.
		One comment states that the cumulative impact of the development has not been fully examined e.g. the PEIR has not taken the visual impact of the wind turbine at the Millennium Country Park and the proposed turbine at Stewartby landfill site into consideration.	CBC	The Millennium Country Park wind turbine is part of the baseline because it is an existing part of the landscape. Other developments have been taken into account in the cumulative assessment within the ES (Document Reference 6.1).
		One comment states the information provided within the EIA should illustrate in drawing form the impact of the MPL proposal without Covanta - and without the benefits of the Covanta landscape scheme. In the Montages - the Covanta EfW building acts as a screen in views from the north. As the development is without significant landscape screening, the power station would be seen from the rights of way and some residential properties in Stewartby. Whilst the latter is	CBC	Chapter 11 of the ES (Document Reference 6.1) considers the impact on the landscape both with and without the Covanta RRF and their associated planting mitigation. A comprehensive Landscape and Ecology Mitigation and Management Strategy (LEMMS) (ES Appendix 11.3, Document Reference 6.2) has been developed for the Project for the scenario where the Covanta RRF does not exist – this has been

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		<p>an issue for BBC, the visual impact from public access routes needs to be fully considered and mitigation designed accordingly.</p>		<p>designed to mitigate the impacts on users of public rights of way. Planting included in the mitigation strategy for the project has been shown in photomontages (Document Reference 7.1).</p>
		<p>One comments states that the "Illustrative Visual" (consultation leaflet) of the MPL development does not show strategic landscape planting on the Application Site. The "woodland" planting to the south is part of the Low Level Restoration Scheme, the land for which is currently being excavated. The proposed planting would need around 15 years' growth to achieve partial screening of the proposal. The rest of Rookery Pit appears "green" as if it was open space.</p>	CBC	<p>The LLRS planting was included in the 'Illustrative Visual' because it is part of the future baseline for the Project. A comprehensive Landscape and Ecology Mitigation and Management Strategy (LEMMS) (Document Reference 6.2, Appendix 11.3) has been developed for the Project. Planting included in the LEMMS has been shown in the submitted photomontages (Document Reference 7.1).</p>
		<p>One comment states that the development will be a major new industrial feature within the Marston Vale, in an area which has a recreational focus, being adjacent to the Millennium Country Park. Although the Rookery Pit site has been zoned for landfill and waste disposal activities, it is still important that development is designed to be sensitive to the rural location, which is highly visible in views from heritage sites along the Greensand Ridge. Current landscape guidance produced by Natural England</p>	CBC	<p>The impact of the Project on the landscape setting and cultural heritage has been considered in both Chapters 11 and 13 of the ES (Document Reference 6.1), and is considered to not significant.</p>

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		places a high emphasis on the cultural qualities of the brick making landscape. Current views in this western edge of the Vale are of open farmland, village landscapes, woodland and the longer distance views to the restored landfill sites of Brogborough and Stewartby. The Marston Vale is noted as an improving landscape - it is also a landscape of increasing importance as a recreational resource for the growing local community, as well as visitors to the Marston Vale forest.		
Ecology	4	One comment notes the presence of protected species including great crested newts and bats within the project area.	Natural England	<p>As part of the EIA the following surveys have been undertaken:</p> <ul style="list-style-type: none"> <li>■ Great crested newt surveys (between mid-April and mid-June 2014); ponds within the Project Site and within 250 m of the Project Site were surveyed (see Document Reference 6.2, Appendix 8.3). Great Crested Newts with Rookery South Pit are to be translocated as part of the on-going Low Level Restoration Scheme. No other populations have been found to exist where impacts could occur as a result of the Project; and</li> <li>■ Bat activity survey (May, July and September 2014; a transect in the</li> </ul>

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				north and transect in the south of the Project Site were undertaken (see Document Reference 6.2, Appendix 8.5, Figures 2a and 2b).
		One comment states that within the Preliminary Environmental Information Report a Phase 1 habitat survey and Phase 2 species surveys have been undertaken to investigate potential impacts on key ecological receptors of the proposals. Necessary mitigation will be species specific	CBC	<p>Table 8.4 of the ES (Document Reference 6.1) lists the proposed mitigation that includes measures to control fugitive dust and construction vehicle emissions and pollution and an appropriate buffer zone maintained from Power Generation Plant.</p> <p>ES Chapter 8 confirms that whilst the scope for enhancement measures within the Project Site is limited due to the restricted land-take for the scheme, opportunities have been maximised to increase the nature conservation value of the off-site habitat creation area within the landscape design for the Project.</p>
		One comment states that the Councils Ecologist is satisfied that baseline conditions will be based on the implemented low level restoration scheme and acknowledges enhancement measures will be undertaken in accordance with NPPF.	CBC	MPL note this comment.

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		One comment states that the baseline information provided in the PEIR is reasonable to inform the future surveys.	CBC	MPL note this comment.
Design	4	One comment states that it assumes the facility is not intending to vent or flare gas either routinely or as an emergency procedure.	Civil Aviation Authority	The Project does not intend to vent or flare gas within its design.
		Two comments ask (Section 2.1.7 PEIR) how can the Low Level Restoration Scheme (LLRS) be completed without the buttressing and re-profiling to the eastern side of the pit being completed?	BBC and CBC	The ES (Document Reference 6.1) states that in order for the Project to be constructed it is not necessary for the buttressing and re-profiling to the eastern side of the pit to be complete. They do not state that the LLRS can be complete without these measures.
		One comment states that significant impacts are unlikely to arise from installations which employ Best Available Techniques (BAT) and which meet regulatory requirements concerning emission limits and design parameters	Public Health England	MPL notes this comment.
Transport	20	Worries regarding proposal identify Manor Road as a preferred access route for construction traffic. Stewartby Parish Council disapprove this route.	Stewartby Parish Council	MPL agreed not to send any construction traffic along Manor Road, instead using the B530.



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		One comment states that they may wish to comment on haul routes if they affect the Grand Union Canal?	The Canal & River Trust	Figure 12.2 of the ES (Document Reference 6.3) shows the proposed construction routes for transport, these do not affect the Grand Union Canal.
		One comment states that supervised traffic management is needed at the Site entrance on Green Lane during construction. As Kimberley College is very close to Site entrance and will pose a risk to vulnerable students.	Marston Moretaine Parish Council	<p>The Transport Assessment (TA) (Document Reference 6.2, Appendix 12.1) considers the impact on major road users. An Outline Construction Traffic Management Plan (Outline CTMP) (Document Reference 6.2, Appendix 12.4) and a Construction Environmental Management Plan (CEMP) (Document Reference 6.2, Appendix 3.2) have also been submitted with the DCO Application to consider impacts during construction.</p> <p>These documents also address traffic management elements with regard to the Project Site access at Green Lane.</p>
		One comment states that where existing roads cannot be used, construction traffic should only cross HP gas pipelines at previously agreed locations	National Grid	MPL notes this comment. Figure 12.2 of the ES (Document Reference 6.2) shows the proposed construction routes for transport.
		One comment states that the HP gas pipeline should be protected at transport crossing points by temporary rafts	National Grid	MPL notes this comment.

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		constructed at ground level. Ground conditions, vehicle type and crossing frequencies should be assessed to determine the type of raft required and agreed with NG		
		One comment states that the local transport impacts of the proposals are likely to be very modest once the Site is operational as no raw materials will enter or exit the Site by road and staff numbers are not expected to exceed five per shift on a 24 hour, three shift rotation basis.	BBC	MPL notes this comment.
		One comment states that during the 22-month construction/decommission and maintenance the traffic generation will be higher	BBC	This comment is correct.
		Bedford Borough Council will expect that access to and from the Site be controlled by a Construction Traffic Management Plan	BBC	An Outline Construction Traffic Management Plan (Outline CTMP) is Appended to the ES (Document Reference 6.2, Appendix 12.4).
		One comment states that due to existing weight restrictions on surrounding local roads it is considered likely that most of the project traffic will be on the Green Lane route directly from the A421 and outside of peak hours.	BBC	Figure 12.2 of the ES (Document Reference 6.3) shows the proposed construction routes for transport, there is an alternative to Green Lane, this is located to the south of the Site at Station Road.

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		<p>One comment states that traffic counts and a full travel assessment should be carried out to establish existing levels of local traffic and identify the scale of change that will result from the development both on Green Lane and other affected roads. This will then inform what and where transport mitigation measures are necessary to address the impacts during the construction period.</p>	BBC	<p>Chapter 12 of the ES (Document Reference 6.1) sets out the assessments that have been undertaken in relation to transport. This includes a full Transport Assessment (Document Reference 6.2, Appendix 12.1).</p>
		<p>One comment expects discussions about routing to continue with both BBC and Central Bedfordshire Highways Departments and these discussions will inform the choice of proposed route option(s) for accessing the gas and electricity connection infrastructure during construction and maintenance.</p>	BBC	<p>Figure 12.2 of the ES (Document Reference 6.3) shows the proposed construction routes for transport. Consultation of these routes has been undertaken as shown in Table 12.1 within the ES (Document Reference 6.1).</p>
		<p>One comment states that there is a need to take into account the ongoing traffic from Stewartby landfill which is accessed off Green Lane between the proposed access road to the power station and the C94. Landfill at this site ceased two years ago but soils for restoration purposes are still being imported. Approximately 17,500 loads of soils are still required but importation is likely to be limited in 2015 and will, therefore, continue into 2016 and 2017. The operator advises that there could be an average of 75-80 loads/day with numbers varying</p>	BBC	<p>To ensure that the assessment is based on the most recent data, traffic and pedestrian / cycle surveys were undertaken in October and November 2014 and in May 2017. As stated in section 12.5 of the ES (Document Reference 6.1) and the TA (Appendix 12.1, Document Reference 6.2).</p>

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		between 20 and 1250 loads depending on availability		
		Two comments states that with in Section 12 (PEIR) the 'old A421' is now the 'C94'.	BBC and CBC	MPL notes this comment. The C94 is correctly referenced in Chapter 12 of the ES (Document Reference 6.1).
		One comment states the trips are split into vehicles per day and then peak hour trips. This is then split between those trips associated with the electrical connection and those associated with the power plant and gas connection. It seems that the vehicles per day trips are total two-way trips and peak hour trips are one way trips, but it is unclear from the table. Further clarity is needed on this in the Transport Assessment	Highways Agency	The Transport Assessment carried out is appended to the ES (Document Reference 6.2, Appendix 12.1) and includes full trip movements associated with each phase of the Project.
		One comment states that details of the anticipated number of trips should be expanded upon within the Transport Assessment, listing both the number of arrivals and departures for the peak hours considered. This information should be presented for the worst case scenario reported, likely to be casting concrete foundation.	Highways Agency	The one off transport requirements for casting concrete foundations have been assessed in Chapter 12 of the ES (Document Reference 6.1) and the Transport Assessment (Document Reference 6.2, Appendix 12.1).
		One comment recommends that further evidence is provided in the Transport assessment to substantiate the figures for the Millbrook proposal, including when the peak hours occur, the number of	Highways Agency	All figures and assumptions are clearly set out in the Transport Assessment (Document Reference 6.2, Appendix 12.1).

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		construction workers likely to be on site and the assumed car occupancy.		
		One comment asks to see the impact on the affected Strategic Road Network junctions in order to confirm whether or not capacity assessments are required. Based on the worse-case scenario.	Highways Agency	Impacts on the strategic road network are considered in the Transport Assessment (Document Reference 6.2, Appendix 12.1) and are not considered to be significant.
		One comment states that following a meeting on 6th November where the potential trip routing options were discussed, it was agreed that these were confirmed and details of all the routes made available in the Transport Assessment. The preferred routing options should also be clarified in the Transport Assessment. With the preparation of an acceptable Route Management Strategy may remove the need for capacity assessments to be undertaken.	Highways Agency	Construction traffic routing options are discussed in section 12.6 of the ES (Document Reference 6.1). The options chosen have taken account of a number of consultation responses on this subject.
		One comment states that the proposed access for the Gas and Electrical connections is planned through Sandhill Close that has both a weight limit of 7.5 tonnes and a 6'6" width restriction. For these reasons it is suggested that this access point is removed from the option list.	Millbrook Parish Council	This traffic route option has now been removed.
<b>PRoW</b>	<b>4</b>	Two comments have regard to Section 12 (Rights of Way) 12.4.9 of the PEIR. Footpaths proposed as part of the LLRS have not been taken into account and are	BBC and CBC	Public Rights of Way have been identified within Chapter 12 of the ES (Document Reference 6.1) and the TA (Appendix 2.1 of Appendix 12.1,

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		<p>not referred to. One path will go round the attenuation pond in Rookery Pit south and is relatively close to the facility. Others run along the edge of the pit (see Restoration Strategy Plan: Public Rights of Way n. 8.8C in S106 for BC/CM/2000/8). Footpaths FP16/FP12/FP15 are located to the west of Rookery Pit south and the railway line. Footpaths FP14/FP65 are to the south of the pit. I attach a copy of the footpaths plan that is in the S106 agreement for Rookery ROMP.</p>		<p>Document Reference 6.2) and include those to be constructed as part of the LLRS scheme.</p>
		<p>Two comments state that the Covanta proposals provide additional footpath links and upgrade some of the paths provided for in the LLRS to footpath/cycle ways. Improved connections to the footpaths in the vicinity of the Site may be achieved if the Covanta scheme proceeds and should be explored in connection with the Millbrook Power Station proposal.</p>	<p>BBC and CBC</p>	<p>Should the Covanta Scheme be constructed the additional/upgraded PRoWs will not be affected by the Project.</p>
<p><b>Cumulative Impact</b></p>	<p><b>8</b></p>	<p>Two comment have regard to Section 12 (construction/decommissioning) 12.4.38 of the PEIR. Stating that there is a need to take account of the potential traffic created by the construction of Covanta – which could take place at a similar time as the construction of the Millbrook Power Plant. The figures for this are set out in the Transport Assessment for the Rookery South Resource Recovery Facility application which was submitted to</p>	<p>BBC and CBC</p>	<p>Section 4.10 of the ES (Document Reference 6.1) lists the developments which have been included in the assessment of cumulative effects. This includes the Covanta RRF project to the north of the Generating Equipment Site. Therefore, Chapter 12 of the ES considers the cumulative impact of both projects constructing simultaneously.</p>

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		<p>the Infrastructure Planning Commission in August 2010 and which are available on the Planning Inspectorate website.</p> <p>Two comments state that there is likely to be other development taking place within the Pit relating to waste management activity and also waste landfill. However, there is currently no detailed information on this although there was an enquiry, which was in the public arena, approximately 15 months ago.</p>	BBC and CBC	<p>Section 4.10 of the ES (Document Reference 6.1) lists the developments which have been included in the assessment of cumulative effects. These include the following:</p> <ul style="list-style-type: none"> <li>▪ Covanta RRF project to the north of the Generating Equipment Site;</li> <li>▪ Integrated Waste Management Operations at Rookery South, Bedfordshire;</li> <li>▪ land at Moreteyne Farm at Wood End in Marston Moretaine proposed for residential properties;</li> <li>▪ Land at Warrant Farm on Flitwick Road in Ampthill proposed for residential properties;</li> <li>▪ Land East and West of Broadmead Road, Stewartby proposed for residential properties - under construction; and</li> <li>▪ New settlement at Wixams.</li> </ul> <p>Therefore, the integrated waste management scheme has been taken in to account. This assessment</p>



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				was limited by the lack of available information for that proposal.
		One comment notes that the information provided states that there will be three associated development projects, but that these will be the subject of separate planning consent applications. We recommend that the EIA includes consideration of the impacts of associated development and that cumulative impacts are fully accounted for.	Public Health England	Cumulative impacts are accounted for within the EIA. The Project as a whole, including the Electrical Connection, Gas Connection and Power Generation Site, has been assessed. All three elements are integral to the Project and are not therefore classes as 'associated development'.
		One comment states that the baseline (of existing environmental quality) and the assessment and future monitoring should identify cumulative and incremental impacts, including those arising from associated development, other existing and proposed development in the local area, and new vehicle movements associated with the proposed development; associated transport emissions should include consideration of non-road impacts (i.e. rail, sea, and air).	Public Health England	Section 4.10 of the ES (Document Reference 6.1) lists the developments which have been include in the assessment of cumulative effects.
		Two comments state that the proposed power plant is relatively modest in comparison to the Covanta building; however, the accumulation of impact is potentially significant.	English Heritage and BBC	Section 4.10 of the ES (Document Reference 6.1) lists the developments which have been include in the assessment of cumulative effects. This includes the Covanta RRF project to the north of the Generating Equipment Site.

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<b>Safety</b>	<b>27</b>	One comment states that Aviation Warning lighting only becomes legally mandated for structures of a height of 150m or more through Article 219 of the UK Air Navigation Order. However, structures of lesser height might need aviation obstruction lighting if they are considered a significant navigational hazard.	Civil Aviation Authority	The maximum proposed height within the Project design is a 35m stack measured from the base of the 15 m deep pit – considerably lower than, for example, the existing transmission towers in the area. Aviation obstruction lighting is not therefore deemed necessary.
		One comment states that cranes used on site need to consider the use of aviation obstructing lighting if they are considered a significant navigational hazard.	Civil Aviation Authority	MPL notes this comment.
		One comments states that in the event that there is no aerodrome issue related with Cranfield Airport the CAA would not in isolation make any case for lighting based on the project proposals in the PEIR NTS.	Civil Aviation Authority	MPL notes this comment.
		One comment states that the civil aviation requirement in the UK is for all structures over 300ft (91.4m) high to be charted on aviation maps. As the structures in the project proposals are below this threshold there is no civil aviation charting requirement subject to Cranfield Airport requirements. However, if a temporary structure such as a crane exceeds this threshold then a Notice to airmen (NOTAM) must be arranged through the CAA.	Civil Aviation Authority	MPL notes this comment.

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		<p>One comment states that the implementation of any unapproved works that affect a Government Pipeline and Storage System Way leave may result in serious consequences in terms of health and safety, expense and other attendant liabilities. The perpetrator and any promoting organisation will be held fully accountable for any resulting damage.</p>	GPSS	MPL notes this comment and is discussing with the OPA the crossing of the GPSS with the Pipeline for the project.
		<p>One comment states that there is no intersection of the proposed Site of the power generation plant on the consultation zones of hazardous installations or major accident hazard pipelines.</p>	Health & Safety Executive	MPL notes this comment.
		<p>One comment states that the proposed DCO Site boundary falls within the following consultation zones of the following major accident hazard pipelines:</p> <ul style="list-style-type: none"> <li>■ The inner, middle and outer CZs of the 7 Feeder Old Warden/Slapton MAHP operated by National Grid Gas PLC (HSE Reference: 7592 / TRANSCO Reference: 1846);</li> <li>■ The inner middle and outer CZs of the 9 Feeder Huntingdon/Whitwell MAHP operated by National Grid Gas PLC (HSE Reference: 7594 / TRANSCO Reference: 1848);</li> </ul>	Health & Safety Executive	MPL notes this comment.

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		<ul style="list-style-type: none"> <li>■ The inner, middle and outer CZs of the 36 Feeder Wellington/Steppingley MAHP operated by National Grid Gas PLC (HSE Reference: 9945 / TRANSCO Reference: 2722).</li> </ul>		
		One comment states the proposed project does not impinge on the separation distances of any explosives licensed sites in the vicinity of the application.	Health & Safety Executive	MPL notes this comment.
		One comment states that the statutory electrical safety clearances must be maintained at all times. Proposed buildings must not be closer than 5.3m to the lowest conductor. No permanent structure should be built directly beneath OHL. These distances are set out in EN 43-8 Technical Specification for "overhead line clearances Issue 3 (2004)".	National Grid	MPL notes this comment.
		One comment If changes to ground levels are proposed within close proximity to OHLs the safety clearances must be maintained.	National Grid	MPL notes this comment.
		One comment states that guidance on development near electricity transmission overhead lines is available from the National Grid.		MPL notes this comment.
		One comment states that Site staff should be aware of the HSE guidance note GS 6 "Avoidance of Danger from Overhead	National Grid	MPL notes this comment.

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		Electric Lines" when working near existing OHL.		
		One comment states that plant, machinery equipment, buildings or scaffolding should not encroach within 5.3 metres of any high voltage conductors when those conductors are under their worse conditions of maximum "sag" and "swing".	National Grid	MPL notes this comment.
		One comment states that drilling or excavation works should not be undertaken if they have the potential to disturb the foundations or pillars of support of any existing OHL towers.	National Grid	MPL notes this comment.
		One comment states that no protective measures including the installation of a concrete slab protection shall be installed over or near the HP gas pipeline without permission from NG.	National Grid	MPL notes this comment.
		One comment states that NG will need to agree the material, dimensions and method of installation of any protective measures of HP gas pipeline through a formal written method statement.	National Grid	MPL notes this comment.
		One comment states any proposed cables must cross the HP gas pipeline at a perpendicular angle (90 degrees).	National Grid	MPL notes this comment.
		One comment states that NG need to supervise any cable crossing of a pipeline.	National Grid	MPL notes this comment.

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		Two comment states that a proposed cable must be at least 600mm above or below a HP Gas pipeline.	National Grid	MPL notes this comment.
		One comment states that the impact protection slab should be laid between the cable and pipeline if cable is crossing above the pipeline.	National Grid	MPL notes this comment.
		One comment states that HS(G) 47 "Avoiding Danger from Underground Services" and NG's specification for Safe Working in the Vicinity of NG HP Gas Pipelines T/SP/SSW22 needs to be taken into account.	National Grid	MPL notes this comment.
		One comment states that NG need to ensure that pipeline access is maintained during and after construction.	National Grid	MPL notes this comment.
		One comments states that NG HP Gas pipelines are buried to a depth of 1.1 metres however; actual depth must be confirmed on site by trial hole investigation under the supervision of a NG representative. The ground cover should not be reduced or increased.	National Grid	MPL notes this comment.
		One comment states if any excavations are planned within 3 meters of NG HP Gas pipeline or within 10 metres of an AGI then the actual position and depth of the pipeline must be established on site in the presence of a NG representative. A safe working	National Grid	MPL notes this comment.

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		method must be agreed prior to any work being taken place.		
		One comment states that excavation works may take place unsupervised no closer than 3 metres from the NG HP Gas pipeline once the actual depth and position has been confirmed on site under supervision of a NG representative. Similarly, excavation with hand held power tools is not permitted within 1.5 metres from NG apparatus and the work must be undertaken with supervision.	National Grid	MPL notes this comment.
		One comment states that within the EIA they would expect to see information about how the promoter would respond to accidents with potential off-site emissions e.g. flooding or fires, spills, leaks or releases off-site. Assessment of accidents should identify potential hazards in relation to construction, operation and decommissioning; include an assessment of the risks posed; and identify risk management measures and contingency actions that will be employed in the event of an accident in order to mitigate off-site effects.	Public Health England	Full risk assessments will be carried out and reported, and methods statements will be produced prior to commencement of construction once contractors are appointed.
<b>Ground Conditions Soil and Agricultural</b>	<b>6</b>	One comment states that Table 10.8 of the PEIR identifies loss of agricultural land as an impact of the gas connection. To assess the significance of this impact Natural England would recommend that the area of agricultural land affected by the works is	Natural England	Section 10.5 of the ES (Document Reference 6.1) quantifies the amount of agricultural land to be affected both during construction and lost permanently. The land classification is also discussed and the Chapter



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		quantified. It may be necessary to undertake an agricultural land quality and soil resources survey to identify the land being affected and inform the methodology for soil handling during the works.		concludes that there is an agricultural assessment is not needed.
		One comment states that they would expect the promoter to provide details of any hazardous contamination present on Site (including ground gas) as part of the Site condition report.	Public Health England	Chapter 10 of the ES (Document Reference 6.1) as well as Appendix 10.1 of Document Reference 6.2) conclude that historical ground investigations have shown that significant contamination is not present at the Project Site. There is no evidence that the Project Site is affected by historical callow sludge filling works and the overall risks have been assessed to be low to very low.
		On comment states that emissions to and from the ground should be considered in terms of the previous history of the Site and the potential of the Site, once operational, to give rise to issues. Public health impacts associated with ground contamination and/or the migration of material off-site should be assessed and the potential impact on nearby receptors and control and mitigation measures should be outlined.	Public Health England	Chapter 10 of the ES (Document Reference 6.1) concludes no impacts have been identified as a result of construction, operation or decommissioning of the Project. In order to determine appropriate design solutions for foundations and any associated infrastructure design, additional structure specific Phase 2 ground investigation will be undertaken, which will further inform the appropriate risk assessments and the need for any Site specific mitigation measures.

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		One comment states that relevant areas outlined in the Government's Good Practice Guide for EIA include effects associated with ground contamination that may already exist.	Public Health England	Chapter 10 of the ES (Document Reference 6.1) it states that historical ground investigations have shown that significant contamination is not present at the Project Site.
		Two comments state that the relevant areas outlined in the Government's Good Practice Guide for EIA include effects associated with the potential for polluting substances that are used (during construction and operation) to cause new ground contamination issues on a site, for example introducing and changing the source of contamination.	Public Health England	Within Section 10.7 of the ES (Document Reference 6.1) it states any pollution releases during construction/demolition works have the potential to affect construction workers. During construction works, there is potential to introduce new sources of contamination into the environment (for instance: uncontrolled leaks and spills from machinery). This represents a small adverse effect on a receptor of medium sensitivity, resulting in a minor significance of effect. To mitigate this effect no special measures are required over and above the embedded mitigation referred to in ES Section 3.6 (Document Reference 6.1) and included in the Construction Environmental Management Plan (CEMP) (Document Reference 6.2, Appendix 3.2). Provided the mitigation measures are implemented there are not anticipated to be any residual effects.

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<b>Cultural Heritage and Archaeology</b>	<b>21</b>	One comment states that evidence should show that the EIA has evaluated the merits/impacts of alternative stack numbers, heights and diameters upon heritage assets.	BBC	Chapter 6 of the ES (Document Reference 6.1) discusses the dispersion modelling that was carried out to ensure that the stack height was as low as possible without causing any significant effects to sensitive receptors. The need for up to five stacks is discussed in the Project alternatives within Chapter 5 of the ES (Document Reference 6.1).
		One comment states that the methods of assessment of impacts on heritage assets and distances for study areas as set out in the PEIR are considered acceptable towards undertaking an Environmental Impact Assessment.	BBC	MPL notes this comment.
		One comments states that the Bedford Borough Historic Environment Record has not been consulted as part of the PEIR and it is requested that it be consulted as part of the EIA.	BBC	The Bedford Borough Historic Environment Record has been consulted and the findings are set out in Chapter 13 of the ES (Document Reference 6.1) and the appended archaeological desk based assessment (Document 6.2, Appendix 13.1).
		One comment states that the bulk of the proposed development is located within Rookery Pit (HER 6681), one of the clay pits that provided the raw material for Stewartby Brickworks during the 20th century. In the	CBC	Chapter 13 of the ES (Document Reference 6.1) and the appended archaeological desk based assessment (Document 6.2, Appendix 13.1) consider the effects of the Project on

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		<p>wider project Site area there are a number of known archaeological sites and features. On the south western edge of the existing clay pit is an Iron Age and Roman settlement (HER 19806) and to the south of that is a ring ditch known from aerial photography (HER 16566), which on morphological grounds is likely to be the remains of a Bronze Age funerary monument.</p>		<p>known archaeological features of the Project Site. A programme of archaeological works, underpinned by a written scheme of investigation would negate construction impacts and this approach has been agreed with CBC. Combined with the limited amount of land required outside of Rookery South Pit there are not considered to be any likely significant impacts.</p>
		<p>One comment states that there are also other as yet uncharacterised crop mark features within this area (HER 4469 and HER 9077), some of these may represent land boundaries of unknown date but frequently such crop marks have been shown to belong to later prehistoric and Roman settlements. On the eastern boundary of the Site is a scatter of medieval pottery has been found possibly indicating occupation of that period (HER 15892). These are heritage assets with archaeological interest as defined by the National Planning Policy Framework (NPPF) and the National Policy Statement for Energy (EN-1).</p>	CBC	<p>Chapter 13 of the ES (Document Reference 6.1) and the appended archaeological desk based assessment (Document 6.2, Appendix 13.1) consider the effects of the Project on known archaeological features of the Project Site. includes provisions to protect local archaeological assets during construction. Combined with the limited amount of land required outside of Rookery South Pit there are not considered to be any likely significant impacts.</p>
		<p>One comment states that the archaeological survey and research in the wider Marston Vale has been limited. However, recent investigations in advance of housing</p>	CBC	<p>A detailed desk based assessment of available archaeological information has been carried out and is appended to the ES (Document Reference 6.2, Appendix</p>

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		<p>development at Stewartby to the north, a road scheme on the northern edge of the Marston Vale and along the route of various pipelines to the south and east have started to identify a range of previously unidentified Sites within the Vale dating from the prehistoric to medieval periods. These sites are often difficult to detect remotely and can only be identified through intrusive investigation and suggest that the Vale contained a much more extensive settlement pattern than had previously been thought. Therefore, the wider project area has the potential to contain so far unidentified archaeological sites and features dating from the prehistoric period.</p>		<p>13.1). A programme of archaeological works, underpinned by a written scheme of investigation would negate construction impacts and this approach has been agreed with CBC (Document Reference 6.2, Appendix 13.3).</p>
		<p>One comment states that the proposed development Site is also located within the setting of a number of Scheduled Monuments including, amongst others, Houghton House (HER 729 and SM 1013522) and Ampthill Castle (HER 810 and SM 10009630) in Greensand Ridge to the south, Thrupp End medieval settlement and moated sites (HER 31 and SM 1010364) to the west, The Rectory Moated site HER 3236 and SM 1009588), Houghton Conquest to the east and Ampthill Park (HER 1369 and RPG 10000378). Under the terms of the NPPF and National Policy Statement for Energy these are designated</p>	CBC	<p>The impact of the Project on heritage assets has been considered in Chapter 13 of the ES (Document Reference 6.1).</p>

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		heritage assets of the highest importance. Development within the setting of these designated heritage assets will have an impact on their significance.		
		One comment states that the PEIR deals with archaeology and cultural heritage issues in Section 13 (baseline information, significance, impacts and mitigation) and Technical Appendices – Volume 1, 12.3 (policy matters). The summary of the policy context is adequate.	CBC	MPL notes this comment.
		One comment refers to an earlier consultation (CB/14/02453/OAC) that is acknowledged in Table 13.4 and generally seem to have been accepted within the Report. The baseline information on archaeology and the cultural heritage will be collected through a desk-based assessment within a study area with a 5km radius for setting issues in relation to designated heritage assets and a 1 km radius for direct physical impacts on undesignated heritage assets. This is a reasonable approach identifying the baseline information on archaeology for the Environmental Statement. In 13.4.1 of the Report it is stated that there are no features of archaeological interest recorded in the Historic Environment Record for plant site. This is not the case as Rookery Pit itself is recorded in the HER (HER 6681) and is important as part of the	CBC	MPL notes this comment and the DCO Application includes an Archaeological Desk-Based Assessment (Document Reference 6.2, Appendix 13.1).

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		remains of the brick making industry in the Marston Vale.		
		One comment requests that a detailed assessment of designated and undesignated heritage assets is proposed for the impact of the power generation plant, including the impact on the setting of the identified designated heritage assets, for the Environmental Statement. This will certainly be required. Photomontages taken from locations 3, 4, 5 and 9 as shown on Figure 11.2 will be required to illustrate the impact on Scheduled Monuments and Registered Parks showing the existing baseline situation, the view after development and with mitigation. The assessment of the impact of the proposal on the setting of designated heritage assets must conform to English Heritage's The Setting of Heritage Assets (2011), in particular 4.2 and the first four steps in the assessment process it describes.	CBC	A programme of archaeological works, underpinned by a written scheme of investigation would negate construction impacts and this approach has been agreed with CBC. (Document Reference 6.2, Appendix 13.3).
		One comment states that the construction of the gas and electrical connections has the potential to affect as yet unrecorded archaeological. This potential impact was identified in the Archaeology Team's earlier comments remains as was the requirement for archaeological field evaluation to provide information on the location, extent and character of any archaeological remains	CBC	A programme of archaeological works, underpinned by a written scheme of investigation would negate construction impacts and this approach has been agreed with CBC. (Document Reference 6.2, Appendix 13.3).



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		<p>that will be affected. The PEIR acknowledges this (Tables 13.12 and 13.13) and says that the scope of the evaluation will be agreed with this Authority. This is satisfactory, but it is important to note that the information from the evaluation is required to inform the Environmental Statement and does not form part of the mitigation process as suggested by the Report (Tables 13.12 and 13.13).</p>		
		<p>One comment states that Section 13.3 of the PEIR briefly discusses mitigation measures. It suggests that “standard mitigation measures include directing development away from known areas of buried archaeology and adherence to a CEMP to set out a process for notifying a local authority archaeologist of any archaeological remains is identified during the development. The avoidance of known archaeological remains is an important method for ensuring there are no damaging impacts on heritage assets with archaeological interest. This does rely on there being adequate information on the on archaeological remains before the development starts, hence the importance the pre-determination archaeological field evaluation of the gas and electrical connection corridors.</p>	CBC	<p>MPL have avoided known archaeological assets during the design process but acknowledges that undiscovered remains may exist. MPL has agreed with CBC that archaeological investigation will be carried out prior to and during construction. (Document Reference 6.2, Appendix 13.3).</p>
		<p>One comment states that the proposals for mitigation based on a reporting process</p>	CBC	<p>MPL has agreed with CBC that archaeological investigation will be</p>

Theme	No. of Comments	Summary of Comments	Consultee	Regard had to response in MPL ES and / or DCO Application
		<p>embedded in the CEMP are wholly inadequate. There is no indication of how archaeological features will be identified in the development process nor of how the impact would be dealt with, presumably some form of investigation, once any remains had been reported. It is also not an appropriate way of dealing with the impact of the proposal on the brick pit (Table 13.10). This section also contradicts mitigation proposals identified in Tables 13.12 and 13.13 for archaeological investigation and recording which is an appropriate strategy.</p>		<p>carried out prior to and during the commencement of construction (Document Reference 6.2, Appendix 13.3).</p>
		<p>One comment suggests that the mitigation proposals contained in the first bullet point of 13.3.1 of the PEIR notes the use of CEMP procedures as the basis for archaeological mitigation, is deleted and replacement with a statement about agreeing an appropriate programme of investigation and recording agreed with this Authority.</p>	CBC	<p>MPL has agreed with CBC that archaeological investigation will be carried out prior to and during the commencement of construction (Document Reference 6.2, Appendix 13.3).</p>
		<p>One comments states that their primary concern at this stage is about ensuring there is sufficient information in the ES to adequately address the impact on heritage assets.</p>	English Heritage	<p>Chapter 13 of the ES (Document Reference 6.1) contains the details of all Heritage Assets within the agreed study area.</p>
		<p>Two comments discussed the need for a range of heritage specific photomontages,</p>	English Heritage	<p>Photomontages (Document Reference 7.1) are shown from both Houghton</p>

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		and that they would appreciate some additional views from those presented in the PIER report. Primarily it would be the views from Houghton House that are likely to be most important, but also Ampthill Park House which is Grade II* and the Scheduled Monument in Ampthill Park.		House and Katharine's Cross in Ampthill Park.
		One comment states that there are also potentially some views from Millbrook Church, in particular from the graveyard at the base of the tower. It is located right on the edge of the ridge overlooking Marston Vale.	English Heritage	Photomontages are shown in Document Reference 7.1. There is no viewpoint location in Millbrook as it was not considered that the Project would be visible at that location.
		One comment refers to the assessment of harm in the PIER heritage statement. The PIER report technical summary (3.9.10) indicates that no significant effects are anticipated, and Section 13.9 (summary and conclusions) continues to state that 'effects are anticipated to be negligible and therefore not significant' or 'minor/moderate'.	English Heritage	MPL notes this comment.
		One comment recognises there will be further assessment for the full ES, our early assessment of the scheme indicates there would be some recognisable change to the setting of the designated heritage assets and in particular Houghton House. As with the previous Covanta scheme, we are concerned that this may be harmful to the significance of these assets. This may mean	English Heritage	MPL notes this comment.

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		that it would be difficult to find common ground on this issue. We recognise however that that there is likely to be demonstrable public benefit from the scheme.		
		One comments states that the web-based system of photomontages that were provided for a solar farm in Norfolk by a Yorkshire based company. Likewise, I'm not able to give a recommendation, but mention it because we were impressed by the usability and clarity of the delivery system, particularly in comparison to the paper-based montages we normally contend with.	English Heritage	MPL notes this comment.
<b>Permits and Consents</b>	<b>24</b>	One comment states that the Government Pipelines and Storage System's apparatus may be effected by the proposals. Land Powers (Defence) Act 1958 specifically prohibits any development and intrusive activities within a GPSS Wayleave of generally 6 metres width and bestride a pipeline 3 metres on either side without specific consent from the Secretary of State for Defence.	GPSS	MPL notes this comment.
		One comment states that guidance on acquiring a Section 16 consent of the Land Powers (Defence) Act 1958 can be acquired if needed.	GPSS	MPL notes this comment and has been in touch with the OPA, who operate the GPSS, regarding a Section 16 consent.

Theme	No. of Comments	Summary of Comments	Consultee	Regard had to response in MPL ES and / or DCO Application
		One comment states that no work should be undertaken without first contacting the GPSS Operator for advice and, if required, Section 16 Consent.	GPSS	MPL notes this comment and has been in touch with the OPA, who operate the GPSS, regarding a Section 16 consent.
		One comment states that landowners and third parties have a duty of care not to carry out any works that have the potential to damage GPSS apparatus.	GPSS	MPL notes this comment.
		One comment states that should the development involve a requirement for any protected species licences to be issued by Natural England early engagement with Natural England is advised.	Natural England	MPL notes this comment. Chapter 8 of the ES (Document Reference 6.1) states that it is not anticipated that protected species licences will be required.
		One comment states with reference to HSE's LUP policy and the intersection with the existing MAHP CZs, we would not expect to be consulted on the grid electrical connection or the gas pipe laying and above ground installation construction activities as they would not be relevant development types.	Health & Safety Executive	MPL notes this comment.
		One comment states that the proposed high pressure gas supply pipeline to the power generation plant may be a MAHP requiring notification under Pipelines Safety Regulations 1996. On receipt of notification HSE would set LUP consultation zones around the pipeline that may affect future developments along the pipeline route which HSE would be a statutory consultee on	Health & Safety Executive	MPL notes this comment.

Theme	No. of Comments	Summary of Comments	Consultee	Regard had to response in MPL ES and / or DCO Application
		future planning applications that fall within the CZs.		
		One comment states that the proposed design and future operations must comply with the Electricity at Work Regulations 1989 and the Electricity, Safety, Continuity and Quality Regulations 2002 as amended.	Health & Safety Executive	MPL notes this comment.
		One comment states that the Health and Safety at work act 1974 and supporting regulations must be satisfied.	Health & Safety Executive	MPL notes this comment.
		One comment states that Anglian Water assets are within the proposed power plant and temporary construction areas. Standard protection easement widths for these assets and any requests for alteration or removal should be conducted in accordance with the Water Industry Act 1991 and protective provisions will be sought by Anglian Water.	Anglian Water	MPL notes this comment. Protective provisions for Anglian Water have been included in the Draft DCO (Document Reference 3.1).
		One comment states that the ZA 400kv Overhead Transmission Line - Grendon to Sundon is located within the order limits. The National Grids OHL's are protected by a Deed of Easement/Wayleave Agreement which provides full right of access to retain, maintain, repair and inspect the asset.	National Grid	MPL notes this comment.
		One comment states that three HP gas mains are located within the proposed order limits. NG has a Deed of Grant of Easement	National Grid	MPL notes this comment.

Theme	No. of Comments	Summary of Comments	Consultee	Regard had to response in MPL ES and / or DCO Application
		for each pipeline. Which prevents the erection of permanent/temporary structures.		
		One comment states that written permission is required before any works commence within the NG HP Gas pipeline easement strip.	National Grid	MPL notes this comment.
		One comment states that a NG representative has to monitor any works within close proximity to the HP gas pipeline to comply with NG Spec T/SP/SSW22.	National Grid	MPL notes this comment.
		Two comments states that a Deed of Consent is required for any crossing of a HP gas pipeline easement.	National Grid	MPL notes this comment.
		One comment states that where NG land, rights or integration with assets is required Protective provisions will be required in a form acceptable to be included in the DCO.	National Grid	MPL notes this comment.
		One comment states that amongst other permits and consents, the development will require an environmental permit from the Environment Agency to operate (under the Environmental Permitting (England and Wales) Regulations 2010). Therefore, the installation will need to comply with the requirements of best available techniques (BAT).	Public Health England	MPL notes this comment and is aware of the need to obtain an environmental permit and comply with BAT. MPL has discussed these matters with the Environment Agency.
		One comment states that protection provisions must be discussed to assist the submission of the application.	Covanta RRF	MPL notes this comment and is actively engaged with Covanta in this regard.



Theme	No. of Comments	Summary of Comments	Consultee	Regard had to response in MPL ES and / or DCO Application
		<p>One comment states that the responsibility for the provision of a mains water supply lies with the water undertaker, Anglian Water Services. If the proposal will require the abstraction of water the applicant should be made aware that under the terms of the Water Resources Act 1991, an Abstraction Licence may be required from the Environment Agency for the abstraction of water from any inland water or underground strata. This is dependent on water resource availability and may not be granted.</p>	Environment Agency	MPL notes this comment. The volumes of water required to operate the plant are low and MPL is investigating the options available to supply the Project.
		<p>One comment states that if it is required to de-water the Site then the activity is currently exempt from requiring an abstraction licence but this activity is due to become licensable in the future. For further information, the applicant should contact the Environment Agency National Permitting Service.</p>	Environment Agency	MPL notes this comment.
		<p>One comment states that the proposal meets the thresholds of requiring an Environmental Permit. Due to the proposed size it will need to meet the requirements of Large Combustion Plant as defined by the Industrial Emissions Directive. A permit will only be issued where there is no significant impact to the environment.</p>	Environment Agency	MPL notes this comment and has since met with the Environment Agency to discuss the Environmental Permit.

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		One comment encourages commencement pre-application discussions on your permit with us as soon as possible, so that your permit application can be parallel tracked with planning considerations.	Environment Agency	MPL notes this comment and has since met with the Environment Agency to discuss the Environmental Permit.
<b>Gas Connection</b>	<b>2</b>	One comment states that whilst both routes are outside of Bedford Borough boundaries the proposed gas route 5 appears to be shorter and likely to have less short and long term impact upon the landscape.	BBC	The shortest practicable gas connection route has been selected to reduce environmental impact where possible.
		One comment states that a telecommunications site marked in the Gas Connection Route Corridor 2 is just off How Road. Seeking confirmation of what works are required and the implications on the Site as to how it will be affected and if indeed it will need to be relocated.	Telefónica UK Limited trading as O2	Gas Connection Route Corridor 2 has been discounted; hence the connection is no longer in the vicinity of How End Road.
<b>Policy</b>	<b>5</b>	One comment states that Section 3.6 of the PEIR mentions the Minerals and Waste Local Plan: Strategic Sites and Policies (2014) (MWLP: SSP) and that Rookery Pit is a strategic Site for waste management purposes. For information whilst Rookery Pit south is allocated for waste management purposes in the MWLP: SSP (2014) the pit is some 100ha in extent and there should be sufficient land for other compatible uses whilst still enabling the Site to be used for the development of waste recovery uses and landfill.	BBC	MPL notes this comment.

Theme	No. of Comments	Summary of Comments	Consultee	Regard had to response in MPL ES and / or DCO Application
		Two comments state that here is no mention of the MWLP2005 within Section 3.6 of the PEIR. This currently contains saved general and environmental policies against which minerals and waste development is assessed. There is also no mention of the 'Managing Waste in New Developments' SPD.	BBC and CBC	MPL notes this comment.
		One comment states that compliance with the requirements of National Policy Statements and relevant guidance and standards should also be highlighted.	Public Health England	The Planning Statement (Document Reference 10.1) explains how the Project is compliant with relevant National Policy Statements.
		One comment states that Section 3.6 of the PEIR mentions the MWLP: SSP and that Rookery Pit is a strategic site for waste management purposes. For information whilst Rookery Pit south is allocated for waste management purposes the pit is some 100ha in extent and there should be sufficient land for other compatible uses whilst still enabling the Site to be used for the development of waste recovery uses and landfill.	CBC	MPL notes this comment.
<b>Health</b>	<b>6</b>	Two comment notes that the details of the connection to the national grid have not yet been finalised and that there is currently no assessment of the potential impacts of electromagnetic fields (EMF). PHE will require the promoter to demonstrate that	Public Health England	An EMF assessment has been carried out within the ES (Document Reference 6.2, Appendix 15.1). The assessment concludes that the maximum magnetic field strengths due to the proposed underground cable connections are

Theme	No. of Comments	Summary of Comments	Consultee	Regard had to response in MPL ES and / or DCO Application
		risks from EMF's have been fully considered and that an assessment of the possible health effects is included in the final submission.		<p>within nationally and internationally accepted guidelines.</p> <p>The change in the electric and magnetic field strengths due to the establishment of the Substation would constitute a 'Minor' effect.</p>
		Two comments recommend that the final report provides a focus which ensures that public health is given adequate consideration. The section should summarise key information, risk assessments, proposed mitigation measures, conclusions and residual impacts, relating to human health. With the assessment considering the development, operational, and decommissioning phases.	Public Health England	Chapter 15 of the ES (Document Reference 6.1) assesses impacts on human health.
		One comment states that consideration should be given to any emitted pollutants for which there are no set emission limits. When assessing the potential impact of a proposed installation on environmental quality, predicted environmental concentrations should be compared to the permitted concentrations in the affected media; this should include both standards for short and long-term exposure.	Public Health England	Emissions have been considered within Chapter 6 of the ES (Document Reference 6.1), both point source and diffuse pollution has been considered within the context of the proposals and concentrations compared against objectives where appropriate. The primary pollutants of concern from an OCGT plant are NO2 and CO.

Theme	No. of Comments	Summary of Comments	Consultee	Regard had to response in MPL ES and / or DCO Application
		<p>One comment states that there is evidence that, in some cases, perception of risk may have a greater impact on health than the hazard itself. A 2009 report, jointly published by Liverpool John Moores University and the HPA, examined health risk perception and environmental problems using a number of case studies. As a point to consider, the report suggested: "Estimation of community anxiety and stress should be included as part of every risk or impact assessment of proposed plans that involve a potential environmental hazard. This is true even when the physical health risks may be negligible." PHE supports the inclusion of this information within EIAs as good practice.</p>	Public Health England	<p>The potential for likely significant effects of the Project on human health relate primarily to exposure to excessive levels of noise, pollutants released during construction or operation of the project (to the air, water or land) as well as effects relating to EMFs. Chapter 15 of the ES (Document Reference 6.1) assesses impacts on human health.</p>
<b>Water</b>	<b>9</b>	<p>One comment states that the baseline (of existing water quality) and in the assessment and future monitoring should include assessment of potential impacts on human health and not focus solely on ecological impacts.</p>	Public Health England	<p>Section 9.6 of the ES (Document Reference 6.1) outlines the existing baseline in relation to water, in terms of flood risk and water quality. The assessment of the potential effects of the Project on water quality and resources presented in this Chapter has shown that the Project will not result in any likely significant environmental effects in relation to water quality and resources on human health either as a standalone project or cumulatively with other projects.</p>

Theme	No. of Comments	Summary of Comments	Consultee	Regard had to response in MPL ES and / or DCO Application
		<p>One comment states that the baseline (of existing water quality) and in the assessment and future monitoring should identify and consider all routes by which emissions may lead to population exposure (e.g. surface watercourses; recreational waters; sewers; geological routes etc.).</p>	Public Health England	<p>Chapter 9 of the ES (Document Reference 6.1) states that the Mill Brook flows to the north, close to the western boundary of Rookery South Pit. The flood risk posed from this is assessed within the Flood Risk Assessment (FRA) (Document Reference 5.4).</p> <p>In addition, the construction of the Project has the potential to mobilise silts and contamination as well as construction and operational activities themselves being at risk from flooding. However, following the implementation of embedded mitigation measures, no likely significant effects have been identified as a result of construction, operation or decommissioning of the Project.</p>
		<p>One comment states that the baseline (of existing water quality) and in the assessment and future monitoring should assess the potential off- Site effects of emissions to groundwater (e.g. on aquifers used for drinking water) and surface water (used for drinking water abstraction) in terms of the potential for population exposure.</p>	Public Health England	<p>Chapter 9 of the ES (Document Reference 6.1) concludes that the assessment of the potential effects of the Project on water quality and resources presented in this Chapter has shown that the Project will not result in any likely significant environmental effects in relation to water quality and</p>

Theme	No. of Comments	Summary of Comments	Consultee	Regard had to response in MPL ES and / or DCO Application
				resources either as a standalone project or cumulatively with other projects.
		One comment states that the baseline (of existing water quality) and in the assessment and future monitoring should include consideration of potential impacts on recreational users (e.g. from fishing, canoeing etc.) alongside assessment of potential exposure via drinking water.	Public Health England	Chapter 9 of the ES (Document Reference 6.1) concludes that the assessment of the potential effects of the Project on water quality and resources will not result in any likely significant environmental effects in relation to water quality and resources either as a standalone project or cumulatively with other projects including effects on recreational users and drinking water.
		One comment states that considerations of the Water Courses in the vicinity of the Site should be undertaken including the route of the Bedford - Milton Keynes Waterway, this should be mapped on the water resources plan.	CBC	Figure 9.1 within the ES (Document Reference 6.3) does not show the Bedford – Milton Keynes Waterway but does show relevant water courses and bodies within close proximity to the Project Site. The Bedford – Milton Keynes waterway is considered too distant from the Project Site to be of relevance.
		One comment states the requirement for a Flood Risk Assessment (FRA) and Surface Water Drainage Plan is understood.	Environment Agency	MPL has carried out a Flood Risk Assessment (FRA) (Document Reference 5.4). Figure 9.1 within the ES (Document Reference 6.3) shows relevant water courses and bodies



Theme	No. of Comments	Summary of Comments	Consultee	Regard had to response in MPL ES and / or DCO Application
				within and near to the Project Site that will inform the Surface Water Drainage Plan.
		One comment states the current proposals are to utilise the existing drainage system (associated with the Low Level Restoration Scheme) to discharge surface water from the new development. It must be clearly demonstrated that the system has sufficient capacity to cope with run-off from the new development for all events up to and including the 1 in 100-year storm, both now and in the future, and that the project does not increase risk to the Site or third parties.	Environment Agency	The Flood Risk Assessment (FRA) (Document Reference 5.4) concludes that the Project is considered to fully comply with National, Regional and Local planning policy in respect of development and flood risk. On this basis, it is concluded that flood risk considerations do not constitute a barrier to the granting of a Development Consent Order
		One comment states that a Foundation Works Risk Assessment (FWRA) will need to be produced to determine the risks to the underlying aquifers from proposed possible piled foundations, as much of the Site is understood to be underlain by a shallow depth of clay above the Kellaways Sand (Secondary A Aquifer). A better understanding should be made to the sensitivity of the Blisworth Limestone Formation (Principal Aquifer), which we understand to be uplifted due to faulting to the north of the Site. This highly sensitive aquifer may be adjacent to the proposed piles.	Environment Agency	Chapter 10 of the acknowledges this need and a requirement for a FWRA is included within the outline CEMP (Document Reference 6.2, Appendix 3.2).

Theme	No. of Comments	Summary of Comments	Consultee	Regard had to response in MPL ES and / or DCO Application
		One comment states that it is the responsibility of the applicant to ensure that the development will not affect any water features (i.e. wells, boreholes, springs, streams or ponds) in the area, including licensed and unlicensed abstractions. There are no licensed abstractions within 3km of this proposal.	Environment Agency	Chapter 9 of the ES (Document Reference 6.1) concludes that the assessment of the potential effects of the Project on water quality and resources presented in this Chapter has shown that the Project will not result in any likely significant environmental effects in relation to water quality and resources either as a standalone project or cumulatively with other projects.
<b>Waste</b>	<b>4</b>	One comment states that the EIA should demonstrate compliance with the waste hierarchy (e.g. with respect to re-use, recycling or recovery and disposal).	Public Health England	As stated in Chapter 15 of the ES (Document Reference 6.1) MPL, at all phases of the Project, will seek to apply the waste hierarchy as part of their waste prevention and management policy.
		One comment states that for wastes arising from the installation the EIA should consider the implications and wider environmental and public health impacts of different waste disposal options.	Public Health England	Chapter 15 within the ES (Document Reference 6.1) states that General waste arising's will be minimal and only small quantities of potentially hazardous waste will be stored on the Project Site at any time. Any such substances will be held in secured containers to prevent contaminant migration. Closed storage facilities or suitable dampening techniques will be utilised within the Project where emissions of dust etc. from waste are possible.

Theme	No. of Comments	Summary of Comments	Consultee	Regard had to response in MPL ES and / or DCO Application
		<p>One comment states for wastes arising from the installation the EIA should consider disposal route(s) and transport method(s) and how potential impacts on public health will be mitigated.</p>	Public Health England	<p>Section 15.2 within the ES (Document Reference 6.1) addresses waste arising stating that waste generated will be minimal and concluded that that the Project will not result in any likely significant environmental effects with respect to waste.</p>
		<p>One comment states that we require further information regarding pollution prevention, such as arrangements during construction, operation and decommissioning of the proposal. Information on waste management is also recommended.</p>	Environment Agency	<p>Section 15.2 within the ES (Document Reference 6.1) addresses waste issues during operation, construction and decommissioning.</p> <p>Pollution prevention in terms of water quality, contamination, air quality and noise is referred to in the relevant ES Chapters (9, 10, 6 and 7 respectively) (Document Reference 6.1).</p>

## **Appendix 5.E: Phase 2 Section 42 statutory consultation respondents' comments and the MPL response**

Theme	No of comments	Summary of comments	Consultee	Regard had to response in MPL ES and / or DCO Application
Transport	22	One comment states that it is highly likely that the proposed new access roads off Green Lane in Stewartby and Station Lane in Millbrook will have an impact on the 2 Level Crossings located on both these roads.	Network Rail Infrastructure Ltd	<p>MPL has liaised with Network Rail asset protection (Richard Draper - Birmingham) on this issue, who previously advised (2015) that they do not have any issues with the MPL Project. It was confirmed with Network Rail that their previous comments are still valid.</p> <p>Network Rail were issued a draft copy of the Transport Assessment (TA) (which includes traffic management measures for Green Lane) and invited to comment on it. Network Rail confirmed that they have no objections to the proposal.</p>
		One comment states that in 2015 there was a proposal to re-model a section of Green Lane where the new access road would join it.	Network Rail Infrastructure Ltd	There would be a small amount of work required by either MPL or Covanta (under the RRF Order) to improve visibility splays at Green Lane. These are described in the TA (sent to Network Rail for comments) and Section 12.7 Chapter 12 of the Environmental Statement (ES).
		One comment states that a traffic management control scheme must be included within the construction works phase to remove issues of blocking back along Green Lane and Station Lane.	Network Rail Infrastructure Ltd	These measures are outlined in the TA and have been agreed with Network Rail. Network Rail were consulted on a draft copy of the TA (which includes a traffic management control scheme) and have confirmed that they have no objections to the proposal.

	<p>One comment states that impacts from the proposal at construction phase and operation phase on Network Rail's level crossings should be considered within the Transport Assessment.</p>	Network Rail Infrastructure Ltd	<p>These measures have been addressed in the TA. Network Rail was issued a draft copy of the TA and have confirmed that they have no objections to the proposal.</p>
	<p>One comment states that any mitigation measures required at the Green Lane and Station Lane level crossings would need to be fully funded by the developer and agreed with Network Rail.</p>	Network Rail Infrastructure Ltd	<p>MPL acknowledge this comment and confirms that any mitigation measures required (as outlined in the TA) would be funded by the developer.</p>
	<p>One comment states that traffic flow within Buckinghamshire as a result of the proposals would not be considered a severe residual impact of the Millbrook Power development.</p>	Buckinghamshire County Council	<p>MPL agrees and considers that no further action is required to resolve this comment.</p>
	<p>Two comments state that the ES should include: Information on the needs of major road users and acknowledges the requirement to ensure that major road users are not disrupted through the development process; Information on the proposed construction traffic mitigation measures, including a draft Construction Traffic Management Plan (CTMP), CEMP and Contractor's Route Management Plan.</p>	Royal Mail Group	<p>The TA considers the impact on major road users. A draft Construction Traffic Management Plan (CTMP) contained in Appendix 12.4 of the TA and draft Construction Environmental Management Plan (CEMP) (Appendix 3.2 of the ES) will be submitted with the DCO Application.</p>
	<p>One comment states that Royal Mail requests to be consulted by MPL on proposed road closures/diversions/ alternative access arrangements, hours of working and the content</p>	Royal Mail Group	<p>MPL will consult Royal Mail on the submitted DCO Application which will include details on any road closures /</p>

		of the CEMP, CTMP and the Contractor's Route Management Plan.		diversions / alternative access / working hours and an outline CEMP and CTMP.
		One comment states that the greatest traffic impacts will occur in the construction and decommissioning periods.	Bedford Borough Council	MPL agree with this comment, impacts are assessed in section 12.7 Chapter 12 of the ES. Appropriate mitigation for the construction and decommissioning phase impacts are set out in Section 12.9 Chapter 12 of the ES.
		<p>Four comments state that the TA should: Evidence that in the operational period there will be very little vehicle activity</p> <p>Consider access impacts by all modes, on existing and future traffic levels and Construction Management Plan (CPM) that uses information from this</p> <p>Consider the suitability of the vehicular access points and routes. The A507 (south) and B530 (east) have both weight and width restrictions on them and will need to be assessed for their suitability for HGV or significant additional traffic.</p> <p>We would however not expect to see routing through the local villages.</p>	Bedford Borough Council	<p>Operational movements would be limited to a small number of full time staff (maximum of 4 at any one time) as well as infrequent maintenance visits (usually one person once a week).</p> <p>MPL confirms that the TA includes details on all the issues raised, including impacts by all transport modes. The TA sets out that vehicle routing through local villages will be avoided altogether by HGVs and where possible by other traffic. Construction and operational access routes are outlined at Section 12.6 Chapter 12 of the ES.</p>
		One comment states that the CMP should include details of on-site wheel wash facilities required during the full construction phase to ensure the public highway remains clear of mud.	Bedford Borough Council	Principles for the use of a wheel wash facility are included in the outline CEMP (Appendix 3.2 of the ES). The exact position will be agreed prior to construction and detailed in the final CEMP.



		<p>One comment states if the EfW [Covanta Project] is not implemented before the Project then a new access will need to be submitted as part of any DCO application.</p>	<p>Central Bedfordshire Council</p>	<p>MPL acknowledge this comment and the matter is dealt with in Chapters 1 and 3 of the ES. If the Covanta EfW Project is not implemented prior to the MPL project, MPL will construct the new Access Road. Two options for the Access Road are provided for through the MPL Draft Order (one complete access road from Green Lane to be built by MPL should it be constructed before Covanta, and the 'Short Access Road' to be built by MPL to connect the Covanta access road to the Generating Equipment Site should the Covanta EfW be constructed first), and are highlighted in the ES in Chapters 1, 3 and 12. Both scenarios, i.e. MPL being constructed first and Covanta being constructed first, have therefore been assessed within the ES.</p>
		<p>Three comments state that the following details should be provided to CBC:</p> <p>details on construction vehicles including abnormal loads</p> <p>full details of a construction traffic route which should not include routing from the A507 through Lidlington, Millbrook or Marston Moretaine.</p> <p>engineering layout of proposed Green Lane access for approval.</p>	<p>Central Bedfordshire Council</p>	<p>This information is included in the TA (Appendix 12.3 of the ES) which outlines the construction and operational traffic routes, the number of abnormal loads and an engineering drawing showing the design of the Green Lane junction (Figure 12.1 of the ES). CBC were issued a draft copy of the TA for comment.</p>

		One comment raised concern about the potential impact of creating permanent access off Houghton Lane.	Central Bedfordshire Council	Section 12.7 Chapter 12 of the ES explains that only the existing access off Houghton Lane would be used on a permanent basis. The access would be improved and used for very infrequent maintenance visits to the AGI. It is not intended as a main access to the Project Site.
		One comment raised concern about the potential impact of regular access to the AGI site off an existing track access.	Central Bedfordshire Council	Section 12.7, Chapter 12 of the ES explains that the access of Houghton Lane is existing and would be improved and only used very infrequently for maintenance visits to the AGI. It is not intended as a main access to the Project Site.
		One comment raised concern that the proposed access off Green Lane could risk traffic backing up and possibly onto the railway line at the Green Lane level crossing.	Central Bedfordshire Council	MPL has liaised with Network Rail asset protection (Richard Draper - Birmingham) on this issue, who has advised that they do not have any issues with the MPL Project.  Network Rail were issued a draft copy of the TA (which included traffic management measures for Green Lane). Network Rail have confirmed that they have no objections to the proposal.
<b>Landscape</b>	<b>17</b>	Three comments stated that the next stage of the landscape and visual assessment should provide further information on:	Chilterns Conservation Board	The Landscape Visual Impact Assessment (LVIA) (Chapter 11 of the ES) includes commentary on the photomontages taken from several viewpoints which have been agreed with

		<p>implications on the skyline view and reassurances that the skyline would not be 'broken' by the proposed 35 metres stack;</p> <p>cumulative impact of the project would require commentary within the scope of the Infrastructure Planning (EIA) Regulations 2009;</p> <p>proposed landscaping to mitigate any visual impact in the wider view and the AONB.</p>		<p>consultees (e.g. CBC). Section 11.9 Chapter 11 of the ES contains a cumulative assessment of MPL and other committed developments, which has also been undertaken in accordance with the 2009 EIA Regulations and the GLVIA 3 guidance.</p> <p>Section 11.5 Chapter 11 of the ES explains that the Chilterns AONB has been scoped out of the assessment given the distance between it and the Project Site (approximately 12 km), intervening topography, and the size of the Project. The Zone of Theoretical Visibility (ZTV) plan produced for the LVIA (Figure 11.1 of the ES) shows that the Project will not be visible from the AONB. Further detail is provided in Section 11.5 Chapter 11 of the ES.</p>
		<p>One comment states that insufficient information has been provided to assess impact on the historic environment and that the only visualisations provided are presented in the Landscape and Visual Impact photomontages from 2014 and Insert 2 in the PEIR Non-Technical Summary.</p>	<p>Historic England</p>	<p>The photomontages in the PEIR and presented in the DCO Application (Document Reference 7.1) were produced in 2017.</p> <p>A high resolution copy of the photomontages were sent to HE in August 2017 in both electronic and hard copy (on USB drive).</p> <p>The range of viewpoints used for the photomontages, together with on-site views where photographs have been taken for analysis (and not turned into photomontages) have been agreed with</p>

				CBC and have been designed to cover both historic and non-historic assets.
		Two comments state that additional Landscape and Visual Impact assessment viewpoints would be valuable and necessary to understand visual impacts on: Houghton House; Marston Mortaine church tower; Ampthill Park House	Historic England	<p>Viewpoint 4 (Figure 11.2 of the ES) provides a sufficient view to assess the effects on Houghton House. Marston Moretaine Church is outside of the ZTV therefore there is no scope for intervisibility and no effects on the church are anticipated.</p> <p>Chapter 11 of the ES contains a view from the eastern edge of Marston Moretaine adjacent to the church (VP 8 presented in the photomontages (Document Reference 7.1) and shows that there is no intervisibility between the church and the Project Site.</p> <p>Chapter 11 of the ES recognises the view from Ampthill Park House which is assessed in Appendix 13.2 of the ES; Viewpoint 7 is taken from the Public Right of Way at the front of the house and is considered to provide a sufficient view for the assessment of effects on setting of the heritage asset.</p> <p>For the avoidance of doubt, photomontages constitute tools to illustrate an assessment of impact on heritage assets, they do not constitute the assessment itself. The assessor has been to site, considered the position from a number of locations and set out a full</p>

				assessment in Appendix 13.2 of the ES. The photomontages are provided for context to the reader.
		One comment states that images and maps need to be of a high resolution to enable assessment of impact on setting of heritage assets.	Historic England	MPL consider that, if printed at the correct scale, the images are of a suitable resolution. However, a high-resolution copy of the photomontages was sent to HE in August 2017 in both electronic and hard copy (on USB drive).
		One comment raises concern over the methodology used to assess designated heritage assets (i.e. viewpoints were viewed from the closest possible publicly accessible location) and states that efforts should be made to ensure that assets are properly assessed including securing private access to undertake the assessment if required.	Historic England	MPL considers that the LVIA assessment has been prepared in accordance with best practice guidance. Guidelines on undertaking photomontages as set out in GLVIA 3 state that they should be taken from publicly accessible locations. Taking views from publicly accessible locations did not lead to any limitations to the assessment of the designated assets or their setting, as a full assessment of the significance and setting of the assets (including how setting contributes to the significance of the assets) was possible on this basis (Appendix 13.2 of the ES).  The approach taken is considered to have been sufficient for undertaking a robust assessment of the assets.
		One comment states that the heritage impact conclusions should consider the effects on significance of heritage assets (i.e. as opposed to the effects on the setting which makes a	Historic England	MPL acknowledges this comment and the assessment presented in Appendix 13.2 of the ES has been refined in order to make clearer that assessments are based on the specific factors and

		contribution to the significance of the Heritage asset).		attributes of each asset and not on their grading alone.
		One comment states that it is not clear how the impact of the sealing end compounds has been considered and that the cumulative impact of the sealing end compounds and the stack should be considered.	Historic England	Section 13.10 Chapter 13 of the ES considers the effects of the Project taken as a whole (including the stack and the SECs together).
		One comment states that based on an initial assessment of the photomontages provided in PIER stage, it is considered that there is likely to be notable harm to the significance of Ampthill Park, Park House and Houghton House through a development within their setting.	Historic England	An assessment of these assets is provided in Appendix 13.2 of the ES. Based on our assessment which has included studying photomontages and visiting the assets, we do not consider that the Project would cause significant harm to the setting of these assets given the scale of the Project and intervening topography, vegetation and buildings, alongside modern features already in the landscape.
		One comment states that the cumulative impact of both projects (the Covanta RRF and MPL) on the significance of heritage assets, in particular Park House, Ampthill Park and Houghton House, is likely to be harmful.	Historic England	An assessment of potential cumulative effects on historic assets is provided in section 13.8 of Chapter 13 of the ES (Document Reference 6.1); and has been fully considered in Appendix 13.2 of the ES (Document Reference 6.2).
		One comment states that there are no viewpoints from within Bedford Borough within the Landscape and Visual Impact assessment and two comments state that additional viewpoints should be included in the final submission: Green Lane/Kimberley College;	Bedford Borough Council	LVIA viewpoint 12 has been taken from the entrance to the Project Site and represents a worst case viewpoint from Green Lane / Stewartby. This assessment shows that the Power

		Rear of Stewartby		<p>Generation Plant is not easily seen given topography and intervening vegetation.</p> <p>The ZTV produced for the Project (Figure 11.1 of the ES) also indicates that the project would not be visible from the majority of the rear of Stewartby.</p>
		One comment states that the Project will require a full landscaping scheme and that a commitment to some off site planting would be beneficial to mitigate the impact on views from public right of way and the residential properties.	Central Bedfordshire Council	<p>An outline Landscape and Ecology Mitigation and Management Strategy, describing mitigation planting proposals for the Project is provided in Appendix 11.3 of the ES. The mitigation planting that has been proposed is contained within the Order Limits of the Project and is therefore does not constitute 'off-site' planting. It is not considered that any further planting is required outside of the Order Limits.</p>
		One comment states that the Project site landscaping scheme should support the aims of The Forest Plan and meet the 30% tree canopy expectation.	Central Bedfordshire Council	<p>The planting proposed in the outline Landscape and Ecology Mitigation and Management Strategy provides for 30% coverage of the land that will be permanently developed by the Project.</p>
		<p>Three comments request that CBC are involved in the future development of the:</p> <p>colour palette;</p> <p>Landscape Management Plan;</p> <p>Ecology Management Plan.</p>	Central Bedfordshire Council	<p>An outline Landscape and Ecology Mitigation Strategy, describing mitigation planting proposals for the Project is set out in Appendix 11.3 of the ES. A Design and Access Statements has also been submitted in support of the DCO Application (Document Reference 10.2) setting out the design principles of the Project.</p>

				<p>Requirement 3 of the draft DCO (Document Reference 3.1) states that the final Landscape and Ecology Mitigation and Management Strategy will be agreed with CBC prior to commencement of construction.</p> <p>MPL confirms that any final decisions on the future development of the colour palette would be agreed with CBC prior to construction.</p>
<b>Water</b>	<b>22</b>	<p>One comment states the site is located entirely within Flood Zone 1 (lowest probability of flooding) on our Flood Map.</p>	The Environment Agency	<p>The Flood Risk Assessment (FRA) (Document Reference 5.4) acknowledges this fact. MPL considers that no further action is required to resolve this comment.</p>
		<p>One comment states that the site is considered to be of moderate sensitivity and could present potential pollutant/contaminant linkages to controlled waters.</p>	The Environment Agency	<p>The potential impacts on controlled waters have been assessed in Section 10.7 Chapter 10 of the ES. Measures set out in the CEMP (Appendix 3.2 of the ES), including undertaking a foundation works risk assessment prior to construction mean that any residual effects would be negligible.</p>
		<p>One comment states that depending on the outcome from the proposed works in the 'Generating Equipment Area' we may require additional site investigation works to provide robust lines of evidence that the risks to controlled waters are low.</p>	The Environment Agency	<p>Additional site investigation works will be undertaken prior to construction, as advised in Chapter 10 of the ES. These are secured through Requirement 8 of the Draft DCO (Document Reference 3.1).</p>



		<p>One comment states that a risk assessment will be required if the application includes infiltration SuDS.</p>	<p>The Environment Agency</p>	<p>MPL confirm that the Project proposals do not include infiltration methods for the disposal of surface water from the Power Generation Plant Site. Surface water runoff arising from the Project is to be routed to the balancing pond brought forward as part of the Rookery South Pit Low Level Restoration Scheme (LLRS). Surface water accumulating within the balancing pond will be pumped to the Mill Brook in accordance with an existing Consent to Discharge (Water). Soakaways may be utilised at the AGI and SECs. However, infiltration tests and risk assessments would be undertaken prior to construction to determine whether this is feasible. These works would be the responsibility of National Grid.</p>
		<p>Two comments regarding pollution prevention:</p> <ul style="list-style-type: none"> <li>• Prior to being discharged into any watercourse, surface water sewer or soakaway system, all surface water drainage from lorry parks and/or parking areas for fifty car park spaces or more and hardstandings should be passed through an oil interceptor designed compatible with the site being drained. Roof water shall not pass through the interceptor.</li> <li>• Prior to being discharged into any watercourse, surface water sewer or soakaway system, all surface water drainage from parking areas for less than fifty spaces</li> </ul>	<p>The Environment Agency</p>	<p>The FRA (Document Reference 5.4) explains that that provision for the management of surface water run-off arising from the completed development are incorporated within the LLRS which is proposed to be implemented prior to the Millbrook Power Project. The CEMP will set out measures for the management / control of surface water run-off during construction.</p> <p>Drainage measures are described in more detail in the FRA (Document Reference 5.4) and pollution prevention measures during construction are set out</p>

		and hardstandings should be passed through trapped gullies with an overall capacity compatible with the site being drained.		in the outline CEMP (Appendix 3.2 of the ES).
		One comment states that the Lead Local Flood Authority (LLFA) and Internal Drainage Board (IDB) should be contacted for drainage advice.	The Environment Agency	MPL have consulted with both the LLFA and IDB on surface water drainage matters. PBA attended a meeting with representatives from both the LLFA and IDB organisations on 4th July 2017.
		<p>Three comments regarding water resources:</p> <ul style="list-style-type: none"> <li>• Advice should be sought from Anglian Water to establish whether water will be supplied using existing sources and under existing abstraction license permissions.</li> <li>• The timing and cost of infrastructure improvements will be a consideration. This issue should be discussed with the water company.</li> <li>• It is the responsibility of the applicant to ensure that no local water features (including streams, ponds, lakes, ditches or drains) are detrimentally affected, including both licensed and unlicensed abstractions.</li> </ul>	The Environment Agency	MPL is not proposing any abstraction for the Project. MPL can confirm that the timing and cost of infrastructure improvements would be discussed with Anglian Water as appropriate. Schedule 10 Part 5 of the draft DCO (Document Reference 3.1) contains Protective Provisions for the protection of Anglian Water. MPL is liaising with Anglian Water regarding the Protective Provisions.
		<p>Two comments state that there are concerns regarding:</p> <ul style="list-style-type: none"> <li>• the attenuation pond;</li> <li>• the risk of flooding.</li> </ul>	Houghton Conquest Parish Council	A FRA (Document Reference 5.4) has been prepared as part of the DCO Application which fully explains the residual flood risk at the site and the role of the attenuation pond. The FRA anticipates no effects on either.

		<p>One comment states that the proposal is acceptable on the basis that the pumped discharge rate for surface water from Rookery Pit into Millbrook Brook will remain unchanged.</p>	<p>Bedford Group of Internal Drainage Boards</p>	<p>MPL confirms that the pumping regime to Mill Brook will not be affected by the proposals and that the IDB has been consulted regarding surface water drainage matters. PBA attended a meeting with the IDB on 4<sup>th</sup> July 2017 to agree the design of the proposed drainage strategy (meeting notes contained at Appendix 4.O.ii of the CR).</p>
		<p>One comment states that protective provisions specifically for the benefit of Anglian Water should be included as part of the wording of the Draft DCO these being in addition to provisions for utility companies as set out in the model provisions for DCO applications.</p>	<p>Anglian Water Services Limited</p>	<p>Schedule 10 Part 5 of the draft DCO (Document Reference 3.1) contains Protective Provisions for the protection of Anglian Water. MPL is liaising with Anglian Water regarding the Protective Provisions.</p>
		<p>Three comments in relation to diversion of Anglian Water assets state that:</p> <ul style="list-style-type: none"> <li>• if it is not possible to incorporate existing water mains within the proposals there may be a need to divert these asset(s);</li> <li>• Anglian Water has a duty to divert existing mains where requested but this would be at the applicant's expense;</li> <li>• if a diversion(s) is required the Applicant would need to make a formal application to Anglian Water for this purpose.</li> </ul>	<p>Anglian Water Services Limited</p>	<p>MPL confirm that diversion of any assets would be fully discussed with Anglian Water at the appropriate time. MPL do not currently anticipate the need to divert any assets owned by Anglian Water.</p>
		<p>One comment states that it is noted that water is not generally required for the project but Anglian Water would welcome further discussion on this</p>	<p>Anglian Water Services Limited</p>	<p>MPL confirm that further discussion would be held with Anglian Water as required.</p>

		issue if a connection to the existing water supply network is required.		
		One comment requests clarity on whether there are any foul flows which will discharge into the public sewerage network in Anglian Water's ownership.	Anglian Water Services Limited	As stated in the FRA (Document Reference 5.4) it is highly unlikely that the Project would be connected to the mains sewer. Given the small number of on-site staff waste water is likely to be collected in a septic tank. However, should any main sewer connection be required, MPL confirm that this would be fully discussed with Anglian Water.
<b>Cultural heritage and archaeology</b>	<b>12</b>	One comment states that HE have concerns over the PEIR method; the sensitivity matrix (table 4.1) categorises a heritage as medium sensitivity however, HE consider the assessed heritage sites to be of high sensitivity and table 13.2 attributes a high sensitivity to various designated heritage assets.	Historic England	MPL acknowledges this comment and as a result the sensitivity matrix, Table 4.4 in Chapter 4 of the ES, has been amended. The methodology outlined in Chapter 13 of the ES has been followed through.
		Four comments on the assessment of heritage assets state that: HE do not agree that the grading of a building reflects the contribution of setting to its significance (PEIR para. 13.5.4); there may be cases where the setting of grade II buildings may encompass a wide area and makes a contribution to their significance; the detailed assessment on heritage assets do not consider the potentially harmful cumulative effect of more industrial development in their setting (Appendix 13.2.);	Historic England	MPL acknowledges this comment and as a result, the assessment presented in Appendix 13.2 of the ES has been refined and it has now been made clearer that assessments are based on the specific factors and attributes of each asset and not on their grading alone.  It has been made clear in Section 13.7 Chapter 13 and Appendix 13.2 of the ES that effects on heritage assets are considered in terms of levels of harm in accordance with the NPPF.

		effects on heritage assets need to be considered in terms of levels of harm in accordance with the NPPF.		
		One comment raises concern over the methodology used to assess designated heritage assets (i.e. viewpoints were viewed from the closest possible publicly accessible location) and states that efforts should be made to ensure that assets are properly assessed including securing private access to undertake the assessment if required.	Historic England	MPL considers that the LVIA follows best practice guidance. Guidelines on undertaking Photomontages as set out in GLVIA 3 state that they should be taken from publicly accessible locations. Taking views from publicly accessible locations did not lead to any limitations to the assessment of the designated assets or their setting, as a full assessment of the significance and setting of the assets (including how setting contributes to the significance of the assets) was possible on this basis (Appendix 13.2 of the ES). The approach taken by PBA is considered to be reasonable and the views were sufficient for undertaking a robust assessment of the assets.
		One comment states that the PEIR document notes the stack may be seen within the settings of designated heritage assets and consequently may have an effect on the contribution setting makes to significance (13.7.7) however the impact is summarised as no more than a slight adverse indirect effect and for the majority of assets there would be a neutral indirect effect.	Historic England	MPL acknowledges this comment and as a result, the wording and assessment has been reviewed and amended as necessary in Chapter 11 of the ES.
		One comment states that the heritage impact conclusions should consider the effects on significance of heritage assets (i.e. as opposed to the effects on the setting which makes a	Historic England	MPL acknowledges this comment and the assessment presented in ES Appendix 13.2 has been refined in order to make clearer that assessments are

		contribution to the significance of the Heritage asset).		based on the specific factors and attributes of each asset and not on their grading alone.
		One comment states that based on an initial assessment of the photomontages provided in PIER stage, it is considered that there is likely to be notable harm to the significance of Ampthill Park, Park House and Houghton House through a development within their setting.	Historic England	An assessment of these assets is provided in Appendix 13.2 of the ES. Based on our assessment which has included visiting the assets, we do not consider that the Project would cause significant harm to the setting of these assets given the scale of the Project and intervening topography, vegetation and buildings, alongside modern features already in the landscape.
		One comment states that the cumulative impact of both projects (RRF and MPL) on the significance of heritage assets, in particular Park House, Ampthill Park and Houghton House, is likely to be harmful.	Historic England	An assessment of these assets is provided in Appendix 13.2 of the ES. Based on our assessment which has included visiting the assets, we do not consider that the Project would cause significant harm to the setting of these assets given the scale of the Project and intervening topography, vegetation and buildings, alongside modern features already in the landscape.
		One comment states that the Archaeological Desk-Based Assessment update should be expanded to cover the impact on the designated heritage assets following the methods and principles described in Historic England (2015) The Setting of Heritage Assets Historic Environment Advice in Planning 3.	Central Bedfordshire Council	An updated Archaeological Desk-Based Assessment has been undertaken and included as an Appendix 13.1 of the ES. It uses the methods and principles described in Historic England (2015) The Setting of Heritage Assets Historic Environment Advice in Planning 3.

		One comment states that impacts on the setting of designated heritage assets should be dealt with in the Historic Environment chapter of the Environmental Statement on the basis that that the recent High Court decision (Steer v SSCLG, 22 June 2017) ruled that the setting of a designated heritage asset is not purely a matter of visual impact.	Central Bedfordshire Council	An assessment of the impacts on the setting of designated heritage assets is included in Appendix 13.2 of the ES.
<b>Electrical connection</b>	<b>15</b>	One comment seeks clarification over the different electrical connection options.	Houghton Conquest Parish Council	Section 3.4 of the ES explains that the design has been refined to only 1 electrical connection option. MPL will consult Houghton Conquest Parish Council on the submitted DCO Application which will include the ES.
		One comment states that National Grid Electricity Transmission has a high voltage electricity transmission overhead line (ZA 400kV Overhead Transmission Line – Grendon to Sundon) which lies within the proposed order limits.	National Grid Electricity Transmission plc	MPL acknowledges this comment and this is the location where the proposed electrical connection will connect into the NETS via a sealing end compound as shown in Figure 3.1 of the ES.
		Five comments make recommendations regarding built development in proximity to National Grid assets: <ul style="list-style-type: none"> <li>• statutory electrical safety clearances must be maintained at all times (distances are set out in EN 43 – 8 Technical Specification for “overhead line clearances Issue 3, 2004);</li> <li>• proposed buildings must not be closer than 5.3m to the lowest conductor;</li> </ul>	National Grid Electricity Transmission plc	MPL acknowledges these comments and confirms that all works will adhere to National Grid advice and best practice.  National Grid would have responsibility for construction of much of the Electrical Connection, as described in the Grid Connection Statement (Document Reference 9.1), and discussions are ongoing with National Grid to determine exact construction methods.

		<ul style="list-style-type: none"> <li>• National Grid recommends that no permanent structures are built directly beneath overhead lines;</li> <li>• If changes in ground levels are proposed either beneath or in close proximity to our existing overhead lines, then this would serve to reduce the safety clearances for such overhead lines;</li> <li>• safe clearances for existing overhead lines must be maintained in all circumstances.</li> </ul>		<p>Schedule 10 Part 3 of the draft DCO (Document Reference 3.1) contains Protective Provisions for the protection of National Grid. MPL is liaising with National Grid regarding the Protective Provisions.</p>
		<p>One comment states that plant, machinery, equipment, buildings or scaffolding should not encroach within 5.3 metres of any of our high voltage conductors when those conductors are under their worse conditions of maximum “sag” and “swing” and overhead line profile (maximum “sag” and “swing”).</p>	<p>National Grid Electricity Transmission plc</p>	
		<p>One comment states that MPL should obtain drawings of National Grid assets using the contact details provided.</p>	<p>National Grid Electricity Transmission plc</p>	<p>MPL has obtained drawings of National Grid assets and is working closely with National Grid regarding the design of the Electrical Connection.</p>
		<p>One comment requests that if a landscaping scheme is proposed only slow and low growing species of trees and shrubs are planted beneath and adjacent to the existing overhead line to reduce the risk of growth to a height which compromises statutory safety clearances.</p>	<p>National Grid Electricity Transmission plc</p>	<p>The draft Landscape and Ecology Mitigation and Management (Appendix 11.3 of the ES) has been designed to have regard to these requirements.</p>



		<p>One comment states that drilling or excavation works should not be undertaken if they have the potential to disturb or adversely affect the foundations or “pillars of support” of any existing tower and that drawings can be obtained using the contact details provided.</p>	<p>National Grid Electricity Transmission plc</p>	<p>MPL acknowledges these comments and confirms that all works will adhere to National Grid advice and best practice.</p> <p>Discussions ongoing with National Grid to determine exact construction methods</p> <p>Schedule 10 Part 3 of the draft DCO (Document Reference 3.1) contains Protective Provisions for the protection of National Grid. MPL is liaising with National Grid regarding the Protective Provisions.</p>
<p>One comment states that National Grid require that no permanent / temporary structures are built over our cables or within the easement strip and that any such proposals should be discussed and agreed with National Grid prior to any works taking place.</p>	<p>National Grid Electricity Transmission plc</p>			
<p>Two comments in relation to National Grid cables state that:</p> <p>ground levels above National Grid cables must not be altered in any way because alterations to the depth of cables will subsequently alter the rating of the circuit and can compromise the reliability, efficiency and safety of our electricity network;</p> <p>if alteration to ground levels above National Grid cables is required then consultation must be undertaken with National Grid prior to any such changes being implemented.</p>	<p>National Grid Electricity Transmission plc</p>			
<p>One comment requests that details of cabling within the public highway is provided within the DCO application.</p>	<p>Central Bedfordshire Council</p>	<p>Detailed design of the Project including the Electrical Connection will be provided prior to construction when the Requirements of the DCO (if made) are discharged.</p>		

<b>Gas connection</b>	<b>15</b>	One comment seeks clarification over the different gas connection options.	Houghton Conquest Parish Council	Section 3.3 Chapter 3 of the ES explains that the design comprises only 1 proposed gas connection option. MPL will consult Houghton Conquest Parish Council on the submitted DCO Application which will include the ES.
		One comment states that National Grid has three high pressure gas transmission pipelines located within the proposed order limits: <ul style="list-style-type: none"> <li>• FM09- Huntingdon- Steppingley;</li> <li>• FM26- Huntingdon- Steppingley;</li> <li>• FM07- Old Warden- Chalgrove.</li> </ul>	National Grid Gas plc	MPL acknowledges this comment and the Project would connect to FM09 via a new AGI as described in Section 3.5 Chapter 3 of the ES.  MPL confirms that FM16 would not be affected by the Project since the Gas Connection would cross FM07.
		Three comments recommend measures to protect the National Grid Gas pipeline: <ul style="list-style-type: none"> <li>• where existing roads cannot be used, construction traffic should ONLY cross the pipeline at previously agreed locations;</li> <li>• the pipeline shall be protected, at the crossing points, by temporary rafts constructed at ground level.</li> <li>• third party shall review ground conditions, vehicle types and crossing frequencies to determine the type and construction of the raft required and the type of raft shall be agreed with National Grid prior to installation.</li> </ul>	National Grid Gas plc	MPL acknowledges this comment and confirms that all works will adhere to National Grid advice and best practice.  National Grid would have responsibility for construction of much of the Gas Connection, as described in the Gas Pipeline Statement (Document Reference 9.2) and discussions are ongoing with National Grid to determine exact construction methods.  Schedule 10 Part 3 of the draft DCO (Document Reference 3.1) contains Protective Provisions for the protection of National Grid Gas plc. MPL is liaising with National Grid Gas plc regarding the Protective Provisions.
		Three comments received regarding protective measures for the National Grid pipeline:	National Grid Gas plc	

		<ul style="list-style-type: none"> <li>• No protective measures including the installation of concrete slab protection shall be installed over or near to the National Grid pipeline without the prior permission of National Grid;</li> <li>• National Grid will need to agree the material, the dimensions and method of installation of the proposed protective measure;</li> <li>• the method of installation shall be confirmed through the submission of a formal written method statement from the contractor to National Grid.</li> </ul>		
		<p>Three comments received on cable crossing of a pipeline:</p> <ul style="list-style-type: none"> <li>• Cables may cross the pipeline at perpendicular angle to the pipeline i.e. 90 degrees and clearance must be at least 600mm above or below the pipeline;</li> <li>• Impact protection slab should be laid between the cable and pipeline if cable crossing is above the pipeline;</li> <li>• A National Grid representative shall supervise any cable crossing of a pipeline.</li> </ul>	National Grid Gas plc	
		<p>Two comments received on service crossing of a pipeline:</p> <ul style="list-style-type: none"> <li>• Where a new service is to cross over the pipeline a clearance distance of 0.6 metres between the crown of the pipeline</li> </ul>	National Grid Gas plc	

		<p>and underside of the service should be maintained; or</p> <ul style="list-style-type: none"> <li>If this cannot be achieved the service shall cross below the pipeline with a clearance distance of 0.6 metres.</li> </ul>		
		<p>One comment requests that the Environmental Statement or any other subsequent report considers the potential impact of the proposed scheme on National Grid's existing assets.</p>	National Grid Gas plc	<p>Chapter 3 of the ES sets out construction methods and describes at a high level best practice construction methods for e.g. crossing pipelines.</p> <p>Schedule 10 Part 3 of the draft DCO (Document Reference 3.1) contains Protective Provisions for the protection of National Grid. MPL is liaising with National Grid Gas plc regarding the Protective Provisions.</p>
		<p>One comment states that details on the nearest gas line should also be included within the DCO application the proposed turbine will run on gas.</p>	National Grid Gas plc	<p>Details of the nearest gas line are fully described in Chapter 3 of the ES. The Project would connect into Feeder 09.</p>
<b>Air quality</b>	<b>13</b>	<p>One comment raises a concern over emissions to air from the stacks.</p>	Houghton Conquest Parish Council	<p>A full air quality impact assessment is set out in Chapter 6 of the ES. This has demonstrated that there would be no significant air quality effects from the Project.</p>
		<p>One comment states that [the ES] should include a full air quality assessment and include any proposed mitigation required to achieve standards in the relevant guidance.</p>	Bedford Borough Council	<p>A full air quality impact assessment is set out in Chapter 6 of the ES. This has demonstrated that there would be no significant air quality effects from the Project.</p>

	<p>One comment states that traffic related Air Quality impacts should also be considered in any Air Quality Assessment (using figures from the TA).</p>	<p>Bedford Borough Council</p>	<p>MPL confirm that traffic related air quality impacts have been considered in the air quality impact assessment in section 6.7, Chapter 6 of the ES. However, no likely significant effects are anticipated given the relatively small numbers of traffic movements during both construction and operation.</p>
	<p>One comment states that the Parish Council express deep concern regarding the potential increase of ground levels of Nitrogen Dioxide (NO<sub>2</sub>) caused by emissions from the stack and the subsequent detrimental impact that this would have upon environmental habitats, human life and wildlife (In reference to PEIR NTS para. 3.2.9 and para. 3.2.11).</p>	<p>Marston Moreteyne Parish Council</p>	<p>A full air quality impact assessment is set out in Chapter 6 of the ES. This has demonstrated that there would be no significant air quality effects from the Project. Section 6.8.16 Chapter 6 of the ES finds that all predicted nitrogen deposition rates are insignificant when compared to the critical loads for the habitats under consideration.</p>
	<p>One comment requests clarification as to what level is a detrimental effect deemed significant in relation to Para. 3.2.11 which states that “it is concluded that there are expected to be no likely significant effects during operation ....”.</p>	<p>Marston Moreteyne Parish Council</p>	<p>MPL confirm that significance is defined in relation to national air quality strategy objectives and assessed in accordance with established guidance. This is further set out in Section 6.5 Chapter 6 of the ES.</p>
	<p>Two comments express concerns about the dispersion of Nitrous Oxide (NO<sub>2</sub>) gases:</p> <ul style="list-style-type: none"> <li>• Nitrous Oxide (NO<sub>2</sub>) gases have the potential to be delayed from being dispersed to a specific height; and therefore,</li> </ul>	<p>Marston Moreteyne Parish Council</p>	<p>MPL confirm that the release of NO<sub>2</sub> gases will not be significantly affected by temperature inversions since gases will be released at a high temperature and at high momentum. This is further described in Section 6.7 Chapter 6 of the ES.</p>

		<ul style="list-style-type: none"> <li>this time delay has the effect that Nitrous Oxide gases could fall to the ground with detrimental effects.</li> </ul>		
		One comment advises that an Air Quality assessment including assessment of the Projects impact on any relevant Air Quality Management Areas (AQMA) will be completed during a permit determination of the relevant air quality modelling files.	The Environment Agency	MPL confirm that the air dispersion modelling as presented in Chapter 6 of the ES has been undertaken taking into account permit modelling requirements, including the cumulative effects with the proposed Covanta Energy from Waste Plant.
		One comment advises that the operator clarifies the scope of any air quality modelling that will be completed for the DCO with the Combustion Lead for the Installations Team.	The Environment Agency	MPL confirm that the air dispersion modelling as presented in Chapter 6 of the ES has been undertaken taking into account permit modelling requirements. This was discussed with the EA in 2014 and has subsequently been the subject of further discussions with the EA regarding permitting of the Project.
		Two comments state that the air quality modelling should take the following factors into account: <ul style="list-style-type: none"> <li>BAT requirements on Energy Efficiency;</li> <li>cumulative impacts from other relevant emission sources such as the proposed Energy from Waste plant.</li> </ul>	The Environment Agency	MPL confirm that the air dispersion modelling as presented in Chapter 6 of the ES has been undertaken taking into account permit modelling requirements, including the cumulative effects with the proposed Energy from Waste Plant.
		One comment states that there would not be any adverse effects to SSSIs through the construction or decommissioning stages; the main potential	Natural England	MPL acknowledges this comment and the air quality assessment presented in Chapter 6 of the ES has taken account of ecological receptors during operation

		for impact to SSSIs would be through changes in air quality during operation of the power plant.		and no likely significant effects are anticipated.
		One comment states that air quality impacts from the proposal will not impact upon King's Wood and Glebe Meadows Site of Special Scientific Interest (SSSI) or Coopers Hill SSSI on the basis that screening has indicated that the process contribution (PC) for all pollutants at all sites will be <1% of the relevant critical level or load for the most sensitive habitat at each site.	Natural England	MPL agrees and considers that no further action is required to resolve this comment
<b>Ground conditions, soil and agricultural</b>	<b>10</b>	One comment states that the EA is in agreement with the proposed groundwater and surface water monitoring programme.	The Environment Agency	MPL acknowledges this comment and considers that no further action is required to resolve this comment.
		One comment states that information collected from the groundwater and surface water monitoring programme is used to inform the Site Condition Report which would support any permit application(s) at this site.	The Environment Agency	MPL acknowledges this comment and confirm that monitoring information would feed into the Site Condition Report .
		One comment states that a Foundation Works Risk Assessment (FWRA) will need to be produced to determine the risks to the underlying aquifers from proposed possible piled foundations.	The Environment Agency	MPL confirms that the FWRA will be undertaken prior to construction as set out in the outline CEMP (Appendix 3.2 of the ES) and will be secured by a Requirement of the DCO.
		One comment states that Appendix 4 of report [Appendix H of the 2017 PEIR] should include borehole logs for all of the trial pits and boreholes which were installed during the site investigation works.	The Environment Agency	MPL confirms that intrusive site investigation will be secured through a requirement of the DCO and will be undertaken prior to construction.

		<p>One comment states that the proposed Phase 2 geo-environmental intrusive investigation in the 'Generating Equipment Area' is welcomed in order to provide robust lines of evidence to discount anthropogenic activities being the source of the identified contamination based on the previous site uses.</p>	<p>The Environment Agency</p>	<p>MPL confirms that intrusive site investigation will be secured through a requirement of the DCO and will be undertaken prior to construction.</p>
		<p>One comment states that the EA require a suitable risk assessment of the Secondary A and Principal Aquifers beneath the site in order to provide a better understanding of the sensitivity.</p>	<p>The Environment Agency</p>	<p>MPL confirm that a Phase 1 Ground Condition Assessment has been submitted as part of the application (Appendix 10.1 of the ES), and contains a risk assessment of Secondary and Principal Aquifers.</p>
		<p>Three comments state that an agricultural land quality and soil resources survey of the site is necessary in order to:</p> <ul style="list-style-type: none"> <li>• assess the significance of the impact of the Gas and Electrical Connections - particularly any areas of land that will not be re-instated or are likely to suffer permanent loss;</li> <li>• Identify whether best and most versatile land is affected and if so to what extent;</li> <li>• Inform the methodology for soil handling during the works.</li> </ul> <p>One comment states that to safeguard soil resources as part of the overall sustainability of the development, it is important that the soil is able to retain as many of its many important functions and services (ecosystem</p>	<p>Natural England</p>	<p>As acknowledged by Natural England, the majority of the Project is sited within brownfield land (Power Generation Plant, Substation, Laydown Area and Access Road). The Gas Pipeline part of the Gas Connection and the underground cable element of the Electrical Connection would both be buried in agricultural land. However, careful construction techniques such as topsoil stripping and storage, together with correct re-instatement would ensure that no agricultural land is sterilised. MPL therefore agrees with Natural England, that there would be no impact from these elements of the Project on agricultural land or soil resources.</p> <p>The remaining elements of the Project sited on agricultural land include the Gas</p>



		<p>services) as possible through careful soil management.</p>		<p>Connection AGI (approximately 0.5ha) and the Electrical Connection Sealing End Compounds (SECs) (0.34ha). Although these elements are sited on agricultural land, it is Grade 3 according to the Agricultural Land Classification and therefore not the best quality or most fertile land (Grades 1 and 2). Although the areas have not been assessed as part of the post 1998 agricultural land assessment, land immediately to the east of the Access Road has, which further classifies this land as Grade 3b – <i>“Land capable of producing moderate yields of a narrow range of crops, principally cereals and grass or lower yields of a wider range of crops or high yields of grass which can be grazed or harvested over most of the year”</i>.</p> <p>Additionally, the area required for the SECs has already been taken out of agricultural tenancy and is no longer farmed. Finally, any effects on agricultural land would be temporary, for a period of 25 years, upon which the Project would be decommissioned and land used for the SECs and AGI re-instated to its former use.</p> <p>A Construction Environmental Management Plan (CEMP) would be produced prior to construction on site, along with method statements for construction of the Gas Connection and</p>
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				<p>Electrical Connection. These documents would advise on the most appropriate working methods to protect agricultural land and soil quality. An outline of the CEMP is included at Appendix 3.2 of the ES.</p> <p>Taking all of the above into consideration, it is not anticipated that there would be a significant impact on soil resources or agricultural land as a result of the Project and therefore any further assessment has been scoped out.</p>
<b>Permits and consents</b>	<b>10</b>	One comment states that CLH Pipeline System apparatus, Energy Act 2013 (CLH PS) may be affected by the proposals.	CLH Pipeline System	Chapter 3 of the ES describes Crossing methods. MPL is liaising with CLH Pipeline System regarding the protection of their apparatus and will either include protective provisions in the DCO or a crossing agreement will be agreed.
		One comment states that the CLH Pipeline System Easement Strips are 6 metres wide and can incorporate other associated CLH Pipeline System facilities.	CLH Pipeline System	MPL acknowledges this comment and considers that no further action is required to resolve this comment.
		One comment states that ESP Connections have no comments at the time (31/05/2017) but that ESP should be re-consulted 90 days after this receipt since ESP are continually laying new gas and electricity networks.	ESP Connections Ltd	MPL will consult ESP on the submitted DCO Application.

		<p>Three comments state that before any works commence within the National Grid easement strip the following should be sought from National Grid Gas Plc:</p> <ul style="list-style-type: none"> <li>• written permission is required from National Grid;</li> <li>• a National Grid representative shall monitor any works within close proximity to the pipeline to comply with National Grid specification T/SP/SSW22;</li> <li>• a Deed of Consent is required for any crossing of the National Grid easement.</li> </ul>	National Grid Gas plc	<p>MPL acknowledges this comment and confirms that all works will adhere to National Grid advice and best practice.</p> <p>Discussions are ongoing with National Grid to determine exact construction methods.</p>
		<p>One comment states that where it is intended to acquire land, extinguish rights, or interfere with any of National Grid apparatus protective provisions will be required in a form acceptable to it to be included within the DCO.</p>	National Grid Gas plc	<p>Schedule 10 Part 3 of the draft DCO (Document Reference 3.1) contains Protective Provisions for the protection of National Grid. MPL is liaising with National Grid Gas plc regarding the Protective Provisions.</p>
		<p>One comment states that the details should be agreed at early stage with Natural England if the development requires any protected species licences to be issued by Natural England since great crested newts and other protected species including bats and badgers are present in within the proposal area.</p>	Natural England	<p>MPL acknowledges this comment although it is not anticipated that any protected species licences would be required.</p>
		<p>One comment states that a pipelines safety regulation notification may be required for the proposal to install a new gas connection pipeline to link to the existing NTS feeder 9 Huntingdon/Whitewell.</p>	The Health and Safety Executive	<p>MPL acknowledges this comment and considers that no further action is required to resolve this comment.</p>

		One comment states that a hazardous substances consent would be required if the site is intending to store or use any of the Named Hazardous Substances or Categories of Substances and Preparations at or above the controlled quantities set out in Schedule 1 of these regulations (Planning Hazardous Substances Act 1990, as amended; and the (Planning Hazardous Substances Regulations 2015)	The Health and Safety Executive	MPL confirms that there are no proposals to store any hazardous substances at the Project Site.
		One comment states that a separate Consent may be required from us for any proposed trade or sewage effluent discharge to a watercourse or other controlled waters. This would also include the 'Laydown Area'.	The Environment Agency	MPL acknowledge this comment although Table 9.1 Section 9.3 Chapter 9 of the ES confirms that no sewage effluent discharges to watercourses will occur as a result of the Project.
<b>Ecology</b>	<b>5</b>	One comment states that there would not be any adverse effects to SSSIs through the construction or decommissioning stages; the main potential for impact to SSSIs would be through changes in air quality during operation of the power plant.	Natural England	MPL acknowledges this comment and the air quality assessment presented in Chapter 6 of the ES has taken account of ecological receptors during operation and no likely significant effects are anticipated.
		One comment states that air quality impacts from the proposal will not impact upon King's Wood and Glebe Meadows Site of Special Scientific Interest (SSSI) or Coopers Hill SSSI on the basis that screening has indicated that the process contribution (PC) for all pollutants at all sites will be <1% of the relevant critical level or load for the most sensitive habitat at each site.	Natural England	MPL agrees and considers that no further action is required to resolve this comment.

		One comment states that previous advice (email from Ross Holdgate on 2 March 2015) is confirmed: that there would be no likely significant effects to the Chiltern Beachwood's Special Area of Conservation; Upper Nene Valley Gravel Pits Special Protection Area; or Ramsar Site either alone or in combination with other plans or projects.	Natural England	MPL agrees and considers that no further action is required to resolve this comment.
		One comment states that if the great crested newt (GCN) exclusion fence (licence 2014-1762-EPS-MIT-1) is taken down before the DCO works commence then there is likelihood that GCNs may access the site and further information is required to explain why it is considered that no further surveys for GCNs are required.	Natural England	MPL provided a detailed response to Natural England on 24 <sup>th</sup> July 2017 regarding this query which explained in detail that the newt fencing would be maintained on site in accordance with land option agreement signed between the applicant and landowner.
		One comment states that the details should be agreed at early stage with Natural England if the development requires any protected species licences to be issued by Natural England since great crested newts and other protected species including bats and badgers are present in within the proposal area.	Natural England	MPL provided a detailed response to Natural England on 24 <sup>th</sup> July 2017 regarding this query which explained in detail that the newt fencing would be maintained on site in accordance with the land option agreement signed between the applicant and landowner.
<b>Health</b>	<b>9</b>	<p>Three comments state that the proposed development gas connection pipeline will fall within the consultation zones of the following major accident hazard pipelines:</p> <ul style="list-style-type: none"> <li>• HSE ref: 7592;</li> <li>• HSE ref: 7594;</li> <li>• HSE ref: 9945.</li> </ul>	The Health and Safety Executive	MPL acknowledges this comment and considers that no further action is required to resolve this comment.

		<p>One comment states that a pipelines safety regulation notification may be required for the proposal to install a new gas connection pipeline to link to the existing NTS feeder 9 Huntingdon/Whitewell.</p>	<p>The Health and Safety Executive</p>	<p>MPL acknowledges this comment and discussions ongoing with National Grid to determine exact construction methods.</p>
		<p>Three comments state that the generic health concerns relate to:</p> <ul style="list-style-type: none"> <li>• Increase in workforce and associated medical emergencies leading to raised call volume and demand;</li> <li>• Traffic volume increase leading to longer and/or delayed response times – information provided references 53 HGV movements and 20 car movements per day during construction;</li> <li>• Detriment to the local health economy.</li> </ul>	<p>The Health and Safety Executive</p>	<p>The potential impact on local health services has been assessed in Chapter 14 of the ES and no significant impacts are anticipated.</p> <p>The traffic impact on other road users is set out in Chapter 12 of the ES.</p>
		<p>One comment states that the Phase 2 consultation documents do not provide sufficient detail to determine if mitigation is required to protect the Ambulance Service and local populace against the impacts of the gas fired power plant development.</p>	<p>East of England Ambulance Service</p>	<p>This comment is noted. The submitted DCO Application considers a range of impacts in various assessments including within the submitted ES.</p>
		<p>One comment states that details of the preferred options for transport, accommodation and medical facilities available to workers will need to be confirmed before measures can be recommended to mitigate the impacts of the gas fired power plant development on the Ambulance Service and local populace.</p>	<p>East of England Ambulance Service</p>	<p>This comment is noted. The submitted DCO Application considers a range of impacts in various assessments including within the submitted ES.</p>

		PHE require the promoter to demonstrate that risks from electric and magnetic fields (EMFs) have been fully considered and that any necessary risk assessment has been undertaken.	Public Health England	MPL acknowledge this comment and a full EMF report has been prepared to inform the DCO application contained in the Appendix 15.1 of the ES.
<b>Noise</b>	<b>3</b>	One comment states that significant mitigation will need to be proposed in the DCO application in order to address the significant adverse effect on residents of up to 16dB when using an assumed noise level from the site that has already been mitigated.	Bedford Borough Council	MPL acknowledge this comment and additional mitigation has been applied to the Project to limit impacts at the nearest noise sensitive receptor such that no likely significant impacts are anticipated (Section 7.7 Chapter 7 of the ES).
		One comment states that BBC seek further assessment of potential noise impacts at ES stage in order to address concerns that significant exceedance at the nearest NSR Bedford Borough Council may potentially affect residents within BBC.	Bedford Borough Council	MPL appreciates that the PEIR noise assessment showed a potentially significant impact at the nearest noise sensitive receptor (South Pilling Farm). However, additional mitigation has been applied to the Project to limit impacts at the nearest noise sensitive receptor such that no likely significant impacts are anticipated (Section 7.7 Chapter 7 of the ES). The closest property in the jurisdiction of Bedford Borough Council (School Lane in Stewartby) is located approximately 1.2km away from the Generating Equipment. Even given the noise levels in the current assessment, we do not anticipate that there would be a significant impact on this property given the distance attenuation.

		Two comments that the CBC Pollution Team and Public Health Team were consulted and did not raise any comments on the content of the PEIR.	Central Bedfordshire Council	MPL acknowledges this comment and considers that no further action is required to resolve this comment.
		One comment advises that it may be appropriate to liaise directly with CBC's Public Protection (Pollution) Team directly to ensure the noise issues we have discussed on the phone are considered appropriately.	Central Bedfordshire Council	MPL confirms that additional correspondence has been undertaken with the EHO at CBC.
<b>Policy</b>	<b>3</b>	One comment acknowledges the positive contribution the project can make to the energy needs of communities.	Buckinghamshire County Council	MPL acknowledges this comment and considers that the likely benefits of the Project which include the public benefit to meeting the national need for flexible gas generation significantly outweigh any potential adverse impacts of the Project.
		One comment states that the Archaeological Desk-Based Assessment update will need to be expanded to cover the impact of the proposed development on the designate heritage assets following the methods and principles described in Historic England (2015) The Setting of Heritage Assets Historic Environment Advice in Planning 3.	Central Bedfordshire Council	An updated Archaeological Desk-Based Assessment has been undertaken and included as an Appendix 13.1 to the ES which includes an assessment following the methods and principles described in Historic England (2015) The Setting of Heritage Assets Historic Environment Advice in Planning 3.
		One comment states that Milton Keyes Council have no comments to make as long as the development is carried out in accordance with regional and your local policies.	Milton Keyes Council	MPL confirms that the Project will achieve the relevant objectives of the applicable National Policy Statements as set out in the Planning Statement (Document Reference 10.1) and it is considered that the likely benefits of the Project significantly outweigh any potential adverse impacts of the Project.



	<b>2</b>	One comment states the interaction between the Millbrook Power Project and the Covanta Waste Incineration Project is unclear and that the quantitative assessment of cumulative effects over time are of interest.	Houghton Conquest Parish Council	Chapters 6 to 14 of the ES provide an assessment of cumulative impacts between MPL and Covanta.
		One comment states that the quantitative assessment of cumulative effects [of the Millbrook Power Project and the Covanta Waste Incineration Project] over time are of interest.	Houghton Conquest Parish Council	MPL acknowledges this comment and Chapters 6 to 14 of the ES provide an assessment of cumulative impacts of MPL and Covanta. MPL will consult Houghton Conquest Parish Council on the submitted DCO Application which will include the ES.

## **Appendix 5.F: Phase 1 Section 47 statutory consultation Respondents' comments and the MPL response**

Theme	No. of comments	Summary of comments	Regard had to response in MPL ES and / or DCO Application
Site Selection	15	<p>Ten comments received oppose the Site selection. Reasons include that the area is already blighted with landfill sites and the proposed energy from waste plant. The Site should be re-instated to green space as it has not been a 'brown field site' for many years. Another comment suggests that the Site should be used for housing instead. Two respondents state that the Site should not be adjacent to the Marston Vale Millennium Country Park. Also further reasons for the Site selection over an urban area are requested, such as why not SW3?</p>	<p>The Site is a former clay extraction Site and in the process of low level restoration however the area is allocated within the Development Plan for major infrastructure development and therefore the intention is not that it should be returned to green field.</p> <p>MPL has undertaken an extensive Site selection process prior to selecting Rookery South Pit. This process identified that the Rookery Site had the following key advantages:</p> <ul style="list-style-type: none"> <li>■ Close proximity to the national gas and electricity distribution networks;</li> <li>■ Within an area identified as being potentially suitable for energy infrastructure;</li> <li>■ The Generating Equipment Site is within previously developed land, lying below ground level;</li> </ul>

Theme	No. of comments	Summary of comments	Regard had to response in MPL ES and / or DCO Application
			<ul style="list-style-type: none"> <li>■ It has a well-developed road network for access to the Project Site;</li> <li>■ The Project Site is outside of areas at risk of flooding; and</li> <li>■ There is adequate space to develop the Power Generation Plant and integral infrastructure.</li> </ul> <p>These details were provided in the ES which was available at the Section 47 public exhibitions. The reasons for the choice of Project Site are clearly set out in Chapter 5 of the ES.</p>
		Four comments received supported the Site selection stating that the proposed Project makes good use of a brown field site.	MPL notes these comments.
		One comment suggests that the plant should be moved closer to the gas route and main railway line and the connection placed underground.	<p>The plant is close to the Gas route. It was decided to position the plant close to the overhead line connection to reduce the connection distance.</p> <p>The underground option is now being progressed.</p>

Theme	No. of comments	Summary of comments	Regard had to response in MPL ES and / or DCO Application
<b>Consultation Material</b>	<b>22</b>	Four comments state that the information provided is clear and conversations with MPL representatives have answered questions. Although one comment suggests information has been put forward more positively than negatively.	MPL notes these comments.
		Three comments state that they have not seen the ES.	Copies of the ES were available at the public exhibitions and at a range of venues around the area such as the Marston Vale Forest centre and the offices of CBC and BBC.
		With regards to the leaflet one comment has stated the font size was too small and another stated that Stewartby was not shown on the planned photo of the Site and asks why there was no meeting/ exhibition in Houghton Conquest?	Venue selection was based on what MPL believed would provide the best coverage of the area and agreed in advance with the local authorities CBC and BBC. Houghton Conquest was close to other venues. Information contained in the leaflet was reproduced in larger scale at the public exhibitions and no adverse comment was received.
		Two comments state that public communication has been poor,	An extensive consultation exercise has taken place with many stages and differing media as set out in

Theme	No. of comments	Summary of comments	Regard had to response in MPL ES and / or DCO Application
		and that plans do not take into account of public opinion.	the Consultation Report. The evolution of the Project design having regard to technical studies and consultation has shown that MPL have had regard to public opinion in relation to the Project. This is further explained in this Consultation Report (Document Reference 5.1).
		Two comments state that more information is needed and that the current studies carried out are incorrect.	<p>MPL have released a significant amount of information as the Project has progressed. Where there is a range of possible effects the full range has been explained through consultation materials and exhibitions.</p> <p>MPL propose to set up a Community Liaison Group, to keep local residents and other stakeholders informed by MPL of developments with regard to this Project.</p>
		Two comments state that the maps are not detailed enough. Electrical lines through Ampthill and a government Oil Pipeline are missing.	This comment is acknowledged. An appropriate scale of mapping has been used for the plans submitted with the DCO Application.

Theme	No. of comments	Summary of comments	Regard had to response in MPL ES and / or DCO Application
		<p>One comment states that more meaningful statements are required about operation, instead of quoting 1,500 hours per year.</p>	<p>This comment is acknowledged. As explained in Chapter 1 of the ES, as a peaking plant the Project would operate for up to 2,250 hours per year, providing the five year rolling average does not exceed 1,500 hours. Peaking plants are required to operate when there is a 'stress event' on the National Grid. This occurs when there is a surge in demand for electricity associated with a particular event (e.g. where many people across the country boil kettles following the end of a popular television programme) or where there is a sudden drop in power being generated from plants which are constantly operational (e.g. a sudden outage). Peaking plants also help to 'balance out' the grid at other times of peak electricity demand and help to support the grid at times when other technologies (e.g. renewable energy sources, such as wind and solar farms) cannot generate electricity due to their intermittent operation and reliance on weather conditions.</p>

Theme	No. of comments	Summary of comments	Regard had to response in MPL ES and / or DCO Application
		One comment stated they have not formally been consulted.	MPL has now identified and communicated with this individual who represents a railway users group. MPL do not believe that they are a S42 party but are covered by S47.
		No clear reference is made throughout the document to the Forest of Marston Vale, and how this Project sits within the Forest. This needs to be addressed.	This issue is addressed within the Planning Statement (Document Reference 10.1).
		Relevant Planning History. Former clay extraction pits do not DOMINATE the Marston Vale. They are present, but as holes in the ground, they are generally recessive.	This comment is acknowledged. The LVIA at Chapter 11 of the ES (Document Reference 6.1) considers the role of the pits in the overall characterisation and assessment of impacts on the landscape.
		Covanta DCO is still extant. This is not made clear	This comment is acknowledged. The extant Covanta RRF DCO will be considered in the DCO application documentation, including the ES (Document Reference 6.1) which considers cumulative impacts.
		This requires clarification. What is intended by 'It is likely that some	Leaving elements of the Project in situ at the time of



Theme	No. of comments	Summary of comments	Regard had to response in MPL ES and / or DCO Application
		structures associated with the Project may be left in situ'	decommissioning can lead to a reduction in environmental impact. For example, the current proposal is that the MPL gas pipeline would be made safe and left in situ at the end of its operational life. Removing the pipeline would likely cause more harm to the environment than leaving it in situ.
		Please note that the Inspectors considering the Covanta application identified the Rookery Pit as 'Green Field' for the purpose of the IPC planning application.	This comment is acknowledged. MPL notes that the Project Site is allocated for development in the Bedford Borough, Central Bedfordshire and Luton Borough Council – Minerals and Waste Local Plan: Strategic Sites and Policies (2014) and this confirms that the Local Planning Authority expect the Site to be built upon.
		The bus services listed here and elsewhere are out of date.	The traffic and transport assessment at Chapter 12 of the ES (Document Reference 6.1) details existing bus services.
<b>Community Benefit</b>	<b>32</b>	10 comments refer to the fact that local residents do not have a mains gas connection stating that a connection could be provided to local residents as part of the	This is acknowledged. The challenges of “stepping down” gas transmission are very great and involve considerable amounts of infrastructure which are outside the

Theme	No. of comments	Summary of comments	Regard had to response in MPL ES and / or DCO Application
		Project, or subsidised or given to elderly residents. In particular, Stewarby is highlighted as a village requiring a gas main.	scope of MPL's business. MPL is not a gas supplier.
		8 comments state that the Project will have no community benefit with the impacts being too great for the area.	<p>Prior to commencement of construction, MPL will deliver an education and employment scheme (the "Education and Employment Scheme") to CBC for approval. The Scheme will set out:</p> <ul style="list-style-type: none"> <li>■ Any provision that it has been possible to make for apprenticeships to be delivered by contractors to MPL during the construction of the Project; and</li> <li>■ A proposed programme of visits to schools located within the Central Bedfordshire district to be made by MPL for a period of five years from the commencement of construction, such visits to be used to explain the Project and how such a facility fits within the</li> </ul>

Theme	No. of comments	Summary of comments	Regard had to response in MPL ES and / or DCO Application
			<p>provision of energy for the United Kingdom.</p> <p>Prior to commencement of construction, to deliver a local service provider engagement scheme (the "Local Services Scheme") to CBC for approval. The Local Services Scheme will set out:</p> <ul style="list-style-type: none"> <li>■ The measures that MPL will take in order to ensure that opportunities for local organisations to bid for contracts during the construction period of the Project are advertised locally (including MPL notifying CBC at the commencement of the procurement process for construction of the Project in order to allow the Council to advertise opportunities via any brokerage scheme that it may run);</li> <li>■ The measures that MPL will take in order to ensure that opportunities for local organisations to bid for contracts during the</li> </ul>

Theme	No. of comments	Summary of comments	Regard had to response in MPL ES and / or DCO Application
		<p>3 comments state that they would like to explore opportunities to enhance the local railway stations through a Section 106 agreement.</p> <p>In addition, one comment would like to see improvements to roads</p>	<p>operational period of the Project (for example for maintenance, waste, cleaning or security services) are advertised locally (including MPL notifying CBC at the commencement of the procurement process for operation of the Project in order to allow the Council to advertise opportunities via any brokerage scheme that it may run); and</p> <ul style="list-style-type: none"> <li>■ The anticipated number of local supplier days that will be hosted by MPL prior to and during construction of the Project.</li> </ul> <p>Details of levels of GVA are set out in Chapter 14 of the ES (Document Reference 6.1).</p> <p>These comments are acknowledged. It is difficult to relate the Project to the improvement of local stations as there is no real connection between the two.</p>

Theme	No. of comments	Summary of comments	Regard had to response in MPL ES and / or DCO Application
		<p>and footpaths as well as providing nature/wildlife crossings.</p> <p>Another comment would like to see Green Lane surface improved.</p>	<p>Similarly, the roads and footpaths are considered to be adequate. However, there will potentially need to be signage improvements.</p> <p>The maintenance of the surface of Green Lane is a Local Authority duty.</p> <p>Draft S106 Heads of Terms have been submitted with the Application (Document Reference (10.3).</p>
		<p>One comment asks for a purchasing policy that would secure all equipment and materials to be sourced sustainably and from local sources.</p>	<p>There is an intention to purchase some equipment and materials locally and where longer term localised services may be required. Some things (e.g. gas turbines) can't be purchased from the local area.</p>
		<p>There are several initiatives in the area which MPL believe should receive a contribution should this development take place: • Ampthill Park Restoration Project – restoration of this historic, Capability Brown park has been</p>	<p>Following a decision to underground the majority of the electrical connection and replace an existing pylon on a one for one basis in order to minimise visual impact. MPL does not consider that impacts arising from the</p>

Theme	No. of comments	Summary of comments	Regard had to response in MPL ES and / or DCO Application
		<p>recognised as a key Project by the Heritage Lottery Fund. Given the impact upon the landscape viewed from the Park and the Greens and Ridge escarpment in particular, a critical element of Brown's original design, then a contribution should be made towards this Project. It may be necessary for restoration proposals to be re-designed to help screen views of this development. Lead organisation is Amptill Town Council.</p>	<p>Project make it necessary to provide a financial contribution in this regard in order to make the Project acceptable.</p>
		<p>There are several initiatives in the area which MPL believe should receive a contribution should this development take place: • Greensand Ridge Landscape Partnership (Sands of Time) – this partnership initiative is seeking to redress the erosion of landscape quality and character suffered by the Ridge, engage communities and help raise awareness of the Ridge. Contributions are currently being sought to support a bid to the Heritage Lottery Fund which, if successful, could pull up to £2m into the area (decision imminent). Lead organisations: Bedfordshire</p>	<p>Following a decision to underground the majority of the electrical connection and replace an existing pylon on a one for one basis in order to minimise visual impact. MPL does not consider that impacts arising from the Project make it necessary to provide a financial contribution in this regard in order to make the Project acceptable.</p>

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		<p>Rural Communities Charity and the Greensand Trust.</p> <p>There are several initiatives in the area which MPL believe should receive a contribution should this development take place: • There is also an initiative to help protect and enhance populations of the Great Crested Newt in the Marston Vale, being led by the Forest of Marston Vale Trust.</p> <p>Developer contribution towards creating the Forest of Marston Vale: The Trust's consistent approach to development within the designated Forest area is based on the fundamental issue of land availability for tree planting, applying a simple arithmetic approach to achieving the target of 30% woodland cover by 2031. To achieve this, given that trees can only be planted on 77% of the Marston Vale (the remaining 23% is already built on or is open water), each development is expected to deliver its pro rata share based on 39% of the gross development area being planted as woodland, or an area equivalent to 39% of the development Site</p>	<p></p> <p>It is understood that the current landowner is engaged in an initiative to translocate Great Crested Newts and enhance habitats.</p> <p>MPL are engaged with FMV with respect to this matter.</p>

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		being planted elsewhere within the Vale.	
		an area of woodland equivalent to 39% of the development Site is provided on-site by the developer as an integral part of the development;	See above.
		an area of woodland equivalent to 39% of the development is provided by the developer off-site on appropriate land under their control within the Forest area;	See above.
		a financial contribution is made by the developer to the Trust sufficient to fund the creation and establishment of an area of community woodland equivalent to 39% of the development Site on land already under the control of the Trust or yet to be acquired by the Trust.	See above.
		The decision as to which of these mechanisms used is largely with the developer, and our preference, as clear from the above hierarchy, is normally that the developer provides the required area of woodland on appropriate land under their control. Should a developer decide to make a	See above.



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		<p>financial contribution then MPL have used a community woodland creation model to calculate the cost of woodland delivery which generates the capital cost of planting and establishing community woodland over 25 years. The budget model was built using over 10 years of community woodland creation experience and expertise; it has been successfully benchmarked against models used by the Forestry Commission and endorsed by them, and subsequently accepted by the Department for Communities &amp; Local Government</p>	
		<p>Over the last decade and more, the Trust has established a sizable body of precedent regarding developer contributions towards creation of the Forest. MPL are keen to understand how the proposed Millbrook Power development will contribute to the creation of the Forest in a way consistent with other development within the Forest area. The contributions secured from the (consented but yet to be constructed) Covanta EfW scheme</p>	<p>See above.</p>

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		<p>is an obvious reference point, these having been scrutinised and confirmed as appropriate through the due planning process. MPL do note the difference in scale of the two development schemes, but given this planning history and precedent it is very disappointing that no reference to or consideration of the need for the development to contribute to the Forest seems to have been made.</p>	
		<p>Neighbour issues: The Forest Centre &amp; Millennium Country Park is the flagship for the Trust, a centre for community engagement, a major local asset and a major revenue generator for the Trust which enables wider delivery of environmental benefits. If the Project goes ahead then all reasonable steps must be taken to ensure that the visual, ecological, economic, amenity and aesthetic impacts on our neighbouring facility are mitigated as fully as possible. MPL would welcome further discussion with you on these issues as more information becomes available.</p>	<p>See above.</p>

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<b>Environmental Impact Assessment</b>	<b>13</b>	<p>Five comments suggest that the Project will impact on nearby and adjoining property. They state that the Project is too close to housing, too close to South Pillinge Farm and in some cases only 500 yards from properties.</p>	<p>The Project has been subject to a full EIA, the results of which have been provided in the ES (Document Reference 6.1). This has considered all potential impacts on the environment and nearest sensitive receptors as agreed during EIA Scoping.</p>
		<p>Five comments state that the impacts of the Project have been overlooked or are too great for the area.</p>	<p>The Project has been subject to a full EIA, the results of which have been provided in the ES (Document Reference 6.1). This has considered all potential impacts on the environment and nearest sensitive receptors as agreed during EIA Scoping.</p>
		<p>Two comments state that detailed consideration of all aspects of the Project is required to minimise impact with one comment stating that they trust that mitigation measures will be implemented.</p>	<p>The Project has been subject to a full EIA, the results of which have been provided in the ES (Document Reference 6.1). This has considered all potential impacts on the environment and nearest sensitive receptors as agreed during EIA Scoping.</p> <p>Mitigation measures will be used as appropriate where they are necessary to limit impacts.</p>

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			Mitigation measures are set out in the ES (Document Reference 6.1).
		One comment states that it is awaiting the EIA to assess impacts especially related to the Forestry Centre.	MPL notes this comment.
<b>Electrical Connection</b>	<b>23</b>	MPL know that it is technically possible to underground the power transmission cables, and that this has not been ruled out to date. This must be the preferred method of transferring power, with additional costs being borne as a result of the need to protect the local landscape	MPL can confirm that it has chosen to underground the electrical connection.
		21 comments object to the new pylons that are proposed as part of the electrical connection for the proposed Project. Stating that they will have a negative impact on the environment, landscape and surrounding views.	MPL can confirm that it has chosen to underground the electrical connection, resulting in no additional pylons being added to the landscape.
		Ten comments go on to state that they would prefer the grid connection to use underground	MPL can confirm that it has chosen to underground the electrical connection, resulting in

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		cables and not overhead pylons to connect to the grid. Others state that the number of pylons needs to be reduced and one question asks if the proposed pylons will be moored.	no additional pylons being added to the landscape. Regarding the mooring, MPL assume the question is referring to backstays and none are currently anticipated.
		One comment states that the connection route should be the south option.	MPL can confirm that the southern option has been chosen.
<b>Socio-economics</b>	<b>11</b>	Assessment of tourist attractions needs to take account of Center Parcs at Steppingley. This will then inform Tables 14.20 and 14.21.	Center Parcs has been included in the socio-economic assessment and is set out in Section 14 of the ES (Document Reference 6.2).
		In the last few days I have heard about the proposals for a new gas-fired power station to be built in Stewartby. I would like to be considered for a Mechanical Maintenance role in the build and operation of the power plant as I feel I would be a good future addition to the plants workforce. I am extremely interested in this role as I am desperate to get back into working in the power industry due to my previous experience at Little Barford Power Station, St Neots. I currently live 20 minutes away	MPL will have a local supplier's policy. Anyone suitably qualified can apply for a role if one is available.

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		<p>from the proposed plant siting and have relevant NVQ and HNC qualifications along with working experience.</p>	
		<p>I understand that you would use your own contractors and contacts for the initial construction however for any last minute needs or indeed ongoing maintenance MPL may be able to help you. When you are in a position to discuss any needs further please contact me and I will come and meet with you to see where MPL can help you.</p>	<p>See above.</p>
		<p>Four comments state that 15 jobs is too few and not a significant benefit to the local community as they would probably not fit with the local skill set.</p>	<p>Further jobs will be created during construction.15 jobs (even if some are people from outside the area) will still have beneficial effects on the local economy (e.g. accommodation and other services such as bakeries, coffee shops etc.)</p> <p>Further details of the economic benefits of the Project are provided in Chapter 14 of the ES (Document Reference 6.1).</p>

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		<p>Three comments state that the Project will have a detrimental effect to property prices in the area and that more information is needed about this impact.</p>	<p>There is no proven link between power station development and a decline in property prices. The location is considered suitable as visual impacts can be minimised by siting the majority of the Project in the Rookery pit and therefore below ground level. Photomontages produced show that the Project will not be visible from the majority of residential areas surrounding the Project Site.</p> <p>MPL notes that the local development plan states that the Site is allocated for development.</p>
		<p>One question asks how many jobs will the Project create and will they be for local people?</p>	<p>Job numbers are given in Chapter 14 of the ES. 15 during operation and ~ 150 during construction. Work will be available for local people / companies to tender for see above.</p> <p>Prior to commencement of construction, to deliver a local service provider engagement scheme (the "Local Services Scheme") to CBC for approval. The Local Services Scheme will set out:</p>

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			<ul style="list-style-type: none"> <li>■ The measures that MPL will take in order to ensure that opportunities for local organisations to bid for contracts during the construction period of the Project are advertised locally (including MPL notifying CBC at the commencement of the procurement process for construction of the Project in order to allow the Council to advertise opportunities via any brokerage scheme that it may run);</li> <li>■ The measures that MPL will take in order to ensure that opportunities for local organisations to bid for contracts during the operational period of the Project (for example for maintenance, waste, cleaning or security services) are advertised locally (including MPL notifying CBC at the commencement of the procurement process for operation of the Project in order to allow the Council to advertise opportunities via any</li> </ul>



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			<p>brokerage scheme that it may run); and</p> <ul style="list-style-type: none"> <li>▪ The anticipated number of local supplier days that will be hosted by MPL prior to and during construction of the Project.</li> </ul>
<b>Noise</b>	<b>8</b>	<p>Appreciated the use of a brown field site, however, there would be a negative effect to the visual impact of the area, including the walks, view, air quality, <b>noise</b> and sheer scale of the development.</p> <p>Five comments state they are opposed to the Project due to noise impact</p>	<p>A full EIA has been undertaken in respect of the Project. See the ES (Document Reference 6.1) that has been submitted with the application.</p> <p>The noise assessment is contained within Section 7 of the ES (Document Reference 6.1). The noise assessment is predicting no significant effects on residential receptors.</p> <p>Potential noise impacts will be fully modelled and assessed in the ES. Preliminary results presented in the ES state that there are no likely significant effects on nearest noise sensitive receptors.</p>

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		<p>Two comments refer to the “Sound Bound” for South Pilling Farm</p>	<p>It is assumed that this refers to a sound/noise bund which is the general term for an embankment normally constructed to shield a development sometimes from sight or for noise purposes. MPL are aware that there is a temporary bund for sound purposes as part of the LLRS. The noise assessment at Chapter 7 of the ES (Document Reference 6.1) indicates that a bund is not required to ensure there are no likely significant effects at the nearest noise sensitive receptors and would provide limited benefits.</p>
		<p>One comment favours the use of one or two Industrial Gas Turbines over three to five Aero-derivative Turbines as the Industrial Gas Turbines will be quieter. A further question asks what the estimated noise levels are when the plant is in operation? Stating that background noise levels mean that BS 4142 is not really suitable.</p>	<p>It has been confirmed that the Power Generation Plant comprises one Gas Turbine Generator. Therefore, the worst case scenario (in terms of noise) of a single Gas Turbine Generator has been assessed in the ES. The use of industrial units is only likely to make a very marginal difference in operational noise.</p> <p>A full noise assessment has been undertaken in Chapter 7 of the ES (Document Reference 6.1),</p>

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			<p>BS4142:2014 has been used to inform the assessment. This was the agreed approach with the Environmental Health Officer at CBC.</p> <p>A sound power noise level of 106 dB has been assumed coming from the stack, sound pressure levels at 1 m from the Generating Equipment of 75 dB and sound pressure levels at 1 m from the Fin Fan Coolers of 85 dB.</p>
		<p>One comment states “Noise close to my house 150m away...”</p>	<p>The noise assessment at Chapter 7 of the ES (Document Reference 6.1) indicates that the sound bund is not required to ensure that there are no likely significant effects at the nearest noise sensitive receptors.</p>
<p><b>Air Quality</b></p>	<p><b>22</b></p>	<p>One comment states that Meteorological data is being used from Cranfield. Cardington might be a better source of data – Cranfield is situated on the Ridge, whereas Cardington is in the Marston Vale, and close to the application Site.</p>	<p>Meteorological data from Cranfield was used in the Air Quality assessment as outlined in Section 6 of the ES (Document Reference 6.1).</p>

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		<p>Met Station in Woburn may help with graphs of height, location. Geographical relief, with distance proximity from Rookery Pit to nearby towns and villages.</p>	<p>Meteorological data from Cranfield was used in the Air Quality assessment as outlined in Section 6 of the ES (Document Reference 6.1).</p>
		<p>Appreciated the use of brown field site, however, there would be a negative effect to the visual impact of the area, including the walks, view, air quality, noise and sheer scale of the development. It was considered that there were a lot of archaeological and ecological matters which outweighed the overall purpose. In addition, as Covanta could still come on board there were concerns as both things would not be needed in one area. It was also considered that the existence of the power station might be used to justify further wind turbines installations. If I can be of any further assistance please let me know</p>	<p>Section 6 of the ES (Document Reference 6.1) concludes that the assessment presented above has shown that the Project will not result in any likely significant environmental effects in relation to air quality either as a standalone Project or cumulatively with other projects, having regard to the design and proposed operation of the Project and embedded mitigation.</p>
			<p>The air quality assessment has shown that the Project will not result in any likely significant environmental effects in relation to air quality either as a standalone</p>

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		<p>Eight comments are concerned about air quality impacts as a result of the Project proposals.</p>	<p>Project or cumulatively with other projects. See Chapter 6 of the ES (Document Reference 6.1).</p>
		<p>Five comments state that insufficient detail on air quality impacts has been provided, with further queries stating:</p> <ul style="list-style-type: none"> <li>■ Where will NOx plumes fall out?</li> <li>■ Why are emissions degraded?</li> <li>■ What is the chimney output?</li> <li>■ What is the air quality impact in the future?</li> <li>■ Local health issues (chest complaints) have reduced since the brick works closed</li> <li>■ Cumulative impact from the development on top of current grit and brick dust from decaying buildings</li> </ul>	<p>The emissions from the stack have been fully modelled and assessed based on a worst case scenario of a single Gas Turbine Generator unit. This has set an appropriate stack height so as not to impact on sensitive receptors and to be within legislative limits for air quality.</p> <p>Diffusion diagrams showing NOx emissions have been produced in the ES (Document Reference 6.1).</p> <p>The stack output is listed in Chapter 6 of the ES (Document Reference 6.1).</p> <p>Legislative limits are set so there will be no impacts on human health from emissions.</p> <p>It is not considered likely that there will be a cumulative impact with grit and brick dust from decaying buildings. The Project will not give</p>

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			rise to significant levels of dust during construction or operation.
		One comment refers to the presence of a thermal inversion in the valley and how has the stack and air quality assessment taken this into account.	The proposed technology choice for the Generating Equipment (open cycle gas turbine) results in a release of exhaust gases from the stack which is at an extremely high temperature (around 550°C) and high pressure. This ensures that although the actual height of the stack will be at least 32.5m, the effective chimney height (top of the emissions release) is many times higher (of the order of hundreds of metres). Therefore, no issues with temperature inversions are anticipated as the exhaust gases would be able to penetrate any inversion layers.
		One comment states that CO2 mitigation should be installed to minimise emissions.	As the Project is below 300MW generating capacity, it falls outside of the legislative requirements to fit CO2 capture. There are therefore no plans to develop CO2 capture or storage alongside the plant as described in Chapter 3 of the ES. .
		One comment objects to the Project proposals due to air quality	The emissions from the stack have been fully modelled. This has set

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		<p>impacts and asks whether the poisonous fumes will reach Edinburgh?</p>	<p>an appropriate stack height so as not to impact on sensitive receptors and to be within legislative limits for air quality.</p> <p>The air quality assessment has shown that the Project will not result in any likely significant environmental effects in relation to air quality either as a standalone Project or cumulatively with other projects. See Chapter 6 of the ES (Document Reference 6.1).</p>
		<p>One comment states that the Project should avoid any emissions.</p>	<p>The emissions from the stack have been fully modelled and assessed. This has set an appropriate stack height so as not to impact on sensitive receptors and to be within legislative limits for air quality.</p> <p>In terms of power generation technology, the use of gas turbines is inherently much cleaner than the use of e.g. coal, biomass, diesel or energy from waste.</p> <p>The air quality assessment has shown that the Project will not result in any likely significant environmental effects in relation to</p>

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			<p>air quality either as a standalone Project or cumulatively with other projects. See Chapter 6 of the ES (Document Reference 6.1).</p>
		<p>One comment stated that they were sceptical of the Project due to air pollution as they were asthmatic, but they were re-assured at an exhibition by an MPL representative.</p>	<p>MPL are grateful for this positive comment. The emissions from the stack have been fully modelled and assessed. This has set an appropriate stack height so as not to impact on sensitive receptors and to be within legislative limits for air quality.</p> <p>The air quality assessment has shown that the Project will not result in any likely significant environmental effects in relation to air quality either as a standalone Project or cumulatively with other projects. See Chapter 6 of the ES (Document Reference 6.1).</p>
		<p>One comment states that provided that air quality is unaffected by emissions they support the Project proposal.</p>	<p>The emissions from the stack have been fully modelled and assessed. This has set an appropriate stack height so as not to impact on sensitive receptors and to be within legislative limits for air quality.</p>



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			<p>The air quality assessment has shown that the Project will not result in any likely significant environmental effects in relation to air quality either as a standalone Project or cumulatively with other projects. See Chapter 6 of the ES (Document Reference 6.1).</p>
		<p>One comment states that the chimney height should be increased after a winter study.</p>	<p>The emissions from the stack have been fully modelled and assessed assuming operation under all weather conditions, including during winter. 5 years worth of meteorological data has fed into the model. This has set an appropriate stack height so as not to impact on sensitive receptors and to be within legislative limits for air quality.</p> <p>The air quality assessment has shown that the Project will not result in any likely significant environmental effects in relation to air quality either as a standalone Project or cumulatively with other projects. See Chapter 6 of the ES (Document Reference 6.1).</p>

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Landscape	44	Seven comments are concerned about the visual impact of the proposed Project from the views from Capability Brown's Grade II listed park, Ampthill Park that recently has received £600k of lottery funding.	Photographs have been taken and photomontages produced from the park showing how the Project will be viewed from that location. Although the Project will be able to be seen from the location it is not considered that these views will be subject to significant detrimental effects.
		Six comments are concerned about the visual impact of the proposed pylons. Stating the electrical connection should use underground cables to mitigate the visual impact.	An underground electrical connection is being progressed.
		Five comments are concerned about the general visual impact of the proposed Project with one comment stating that the visual impact will be devastating for a plant that is not used for 302.5 days a year.	The landscape and visual impacts of the Project have been assessed by undertaking field visits and producing photomontages of the plant from key viewpoints which have been agreed with statutory consultees.  Section 11 of the ES (Document Reference 6.1) concludes that the resulting significance of cumulative landscape effects would be either minor significant or not significant.

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		<p>Five comments are concerned with the impact the proposed Project will have on the landscape character of the area. Stating that the area is of high landscape value.</p>	<p>The landscape and visual impacts of the Project have been assessed by undertaking field visits and producing photomontages of the plant from key viewpoints which have been agreed with statutory consultees.</p> <p>Section 11 of the ES (Document Reference 6.1) concludes that the resulting significance of cumulative landscape effects would be either minor significant or not significant.</p>
		<p>Three comments are concerned with the visual impact of the proposed stack in conjunction with existing stacks in the area. One question asks will the 120 stacks be visible above ground level? Another questions asks if the stacks could be painted to look like the Stewartby chimneys that are part of the local landscape.</p>	<p>As above, the visual impact of the stack has been considered by undertaking field visits and producing photomontages of the plant from key viewpoints which have been agreed with statutory consultees.</p> <p>It is assumed that the reference is to 120-foot-tall stacks. There will be a single stack of between 32.5m and 35m in height. The plant will be sited in the Rookery pit, which will have a finished ground level of approximately 15mbgl. Therefore, the stack will be visible up to approximately</p>

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			<p>between 17.5m to 20m above ground level.</p> <p>The design of any structures would be informed by MPL's design principles; these are set out in the Design and Access Statement (Document Reference 10.2). These principles seek to minimise the impacts of the Project on the environment and visual amenity.</p>
		<p>Two comments highlight the importance of mitigation to reduce the visual impact of the Project with one comment stating that planting to protect views from Ampthill and Stewartby is very important.</p>	<p>Mitigation measures have been fully assessed in the ES and used to limit visual impacts where appropriate. An Outline Landscape and Ecology Mitigation and Management Strategy (LEMMS) has been prepared and can be found as an Appendix to the ES (Document Reference 6.2, Appendix 11.3). This sets out how landscaping has been used to limit visual impacts.</p>
		<p>One comment says that the statement 'there will be no significant effect on visual Heritage Site' is untrue.</p>	<p>A Historic Environment assessment has been undertaken at Chapter 13 of the ES (Document Reference 6.1).</p>

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			<p>The professional judgement is that as the significance of the assets themselves is largely unaffected and the impact are not considered to be significant.</p>
		<p>One comment states that visual impacts look quite limited</p>	<p>Where possible the applicant has tried to limit visual impacts by reducing the stack heights and the number of stacks as much as possible and siting the generating equipment within Rookery pit.</p> <p>MPL can confirm that the electrical connection will be undergrounded, resulting in no additional pylons in the landscape.</p>
		<p>One comment states that they own land at Millbrook which is designated an Area of Outstanding Natural Beauty and will overlook the proposed Project. As a result, what compensation will they get?</p>	<p>The nearest area designated as an Area of Outstanding Natural Beauty (AONB) is the Chilterns AONB, which will not be impacted by the Project as it is over 40 km away. There is no AONB within or surrounding Millbrook.</p>
		<p>The visual impact has not been fully quantified, with work to assess this only being carried out in the summer months when trees and hedges are in full leaf and</p>	<p>Section 11 of the ES (Document Reference 6.1) concludes that the resulting significance of cumulative</p>

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		therefore only representing the impacts at the time of year when they are least noticeable.	landscape effects would be either minor significant or not significant.
		The visual splay has been calculated on this limited basis, and the location of viewpoints is dependent upon this. Therefore, I would wish to see evidence of the visual impact being thoroughly analysed throughout the year.	Section 11 of the ES (Document Reference 6.1) sets out the full methodology for the Landscape and Visual Impact Assessment.
		The visual splay, and therefore all else that is dependent upon it, does not state whether it relates to the visual impact of the main compound, chimneys or power transmission pylons. This must be clarified, and if any element has not been taken into consideration, it must be.	Where possible MPL has sought to limit visual impacts by e.g. reducing the stack heights and numbers as much as possible and siting the generating equipment within Rookery pit.  MPL can confirm that the electrical connection will be undergrounded, resulting in no additional pylons in the landscape.
		The number and position of points from which visual impact is demonstrated is limited, and includes very few points that demonstrate the impact on views against the backdrop of the Greensand Ridge. These are critical views, given the sensitivity of the Ridge. Views from the local	The viewpoint from the eastern boundary of the Millennium Country Park was added to the LVIA by MPL. Other suggested viewpoints were not incorporated within the assessment because it was considered that other

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		Rights of Way network should be taken into account as users of this network are considered sensitive receptors. An example would be views from FP15.	viewpoints already assessed were representative and sufficient.
		The Vale landscape to the north of the Ridge is recognised as crucial to the setting of the Greensand Ridge, as it emphasises the dramatic change in gradient which characterises the northern scarp slope of the Ridge – the open, level ground of the Vale is a foil to the steeply rising escarpment with it's mosaic of woodland, pasture and arable land	MPL notes this comment.
		The Landscape Character Assessment (LUC 2007/ revised 2014) describes this relationship as a key visual sensitivity: “the largely undeveloped base of the wooded slope where the contrast between the wooded landform and the open vale is an important element”.	MPL notes this comment.
		The landscape of the Vale has become highly fragmented as a result of the presence of transport corridors and the increase in development. Development guidelines seek to enhance the rail	MPL notes this comment.

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		(and road) corridors and “avoid development of land at the base of the Mid Greensand Ridge in order to conserve the distinct visual contrast between the flat vale and steep slopes.	
		In addition, development is required to contribute positively to landscape character through associated planting and also to enhance the rights of way network.	A Landscape and Ecology Mitigation and Management Strategy (LEMMS) has been prepared and can be found as an Appendix to the ES (Document Reference 6.2, Appendix 11.3). This sets out how landscaping has been used to limit visual impacts.. This will also have due regard to planting and Public Rights of Way (PROWs).
		Given the significance of the Ridge as a landscape and recreational resource, MPL were surprised at the very limited acknowledgement of it in the proposals.	The viewpoint from the eastern boundary of the Millennium Country Park was added to the LVIA.
		The impact upon views from Ampthill Park will be particularly impacted upon. The Park, a Grade II Listed Park, is currently subject to significant Heritage Lottery Fund support for its restoration Project. This Project will restore the Capability Brown	See above.



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		<p>designed landscape, which includes opening up and interpreting vistas. The view from the escarpment across the Vale is a particularly important one, and the visual clutter potentially created by this proposal would significantly impact these views.</p>	
		<p>The impact of night-time lighting also needs to be clarified and assessed.</p>	<p>MPL Notes this comment.</p>
		<p>While opportunities for mitigation of the visual impact are limited due to the scale of features such as pylons and chimneys, the landscaping proposed is limited and feeble in terms of what should be achieved. This is exacerbated by the fact that the proposal has to take account of the (doomed) Covanta proposal which it is still necessary to consider possible. Much better landscaping would be possible if the development footprint could be located in a different part of the Site. Tree planting should be more natural/less regimented in structure than is currently indicated. Any building structures should have external faces treated</p>	<p>Where possible MPL has sought to limit visual impacts by e.g. reducing the stack heights and numbers as much as possible and siting the generating equipment within Rookery pit.</p> <p>MPL can confirm that the electrical connection will be undergrounded, resulting in no additional pylons in the landscape.</p>

Theme	No. of comments	Summary of comments	Regard had to response in MPL ES and / or DCO Application
		with a fading effect similar to that of other warehouses in the Marston Vale, to help them blend in a little more to their surroundings.	
		The visual impact of the main compound is significantly exacerbated by the impact of power transmission pylons. The Marston Vale is a landscape in transmission, and is a significant recreational resource as well as a prime location for people to live and work. Therefore, significant additional visual clutter should not be permitted	MPL can confirm that the electrical connection will be undergrounded, resulting in no additional pylons in the landscape.
		Energy Policy EN1 seeks infrastructure developments to minimise harm to the landscape and to provide reasonable mitigation. Designing the grid connection to be underground from the outset would be the most effective means of reducing the visual impact of the plant in views from nationally important heritage features such as Ampthill Park and Ampthill Park House as well as from the extensive rights of way network.	MPL can confirm that the electrical connection will be undergrounded, resulting in no additional pylons in the landscape.

Theme	No. of comments	Summary of comments	Regard had to response in MPL ES and / or DCO Application
		<p>Appreciated the use of a brown field site, however, there would be a negative effect to the visual impact of the area.</p>	<p>Where possible MPL has sought to limit visual impacts by e.g. reducing the stack heights and numbers as much as possible and siting the generating equipment within Rookery pit.</p> <p>MPL can confirm that the electrical connection will be undergrounded, resulting in no additional pylons in the landscape.</p>
		<p>The PIER landscape description needs to make it clear that the Marston Vale is surrounded by higher ground that forms an amphitheatre around the vale, and affords wide reaching and panoramic views. The impact of the Project on the Greensand Ridge, which is a high value landscape needs to be carefully considered.</p>	<p>MPL notes this comment.</p>
		<p>The visual impact of the additional 6 electricity pylons needs to be carefully assessed and considered. These cannot be dismissed just because they are pylons, and not solid structures</p>	<p>MPL can confirm that the electrical connection will be undergrounded, resulting in no additional pylons in the landscape.</p>
		<p>The potential visual impact of 6 additional pylons needs to be</p>	<p>MPL can confirm that the electrical connection will be undergrounded,</p>

Theme	No. of comments	Summary of comments	Regard had to response in MPL ES and / or DCO Application
		<p>considered carefully and seriously. They represent additional tall structures in the vale, and should be assessed accordingly. The question of whether or not they are preferable to a substation at ground level should be properly considered</p>	<p>resulting in no additional pylons in the landscape.</p>
		<p>Table 11.10, relevant landscape designations 'woodland' should include the 'Forest of Marston Vale'            Table 11.11, please consider adding a viewpoint from footpath 13/15 in the Millennium Park that runs adjacent to the Marston Vale Railway line, and therefore close to the Rookery Pit.</p>	<p>The viewpoint from the eastern boundary of the Millennium Country Park was added to the LVIA by MPL.</p>
		<p>Views of the power plant will not be seen in the context of the wind turbine/railway etc. Context will depend upon the viewpoint.</p>	<p>MPL notes this comment.</p>

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		<p>The visual impact of the additional chimneys and pylons will be considerable, especially when viewed from above, i.e. from Ampthill Park. Impact should not be dismissed as 'not significant'. Impact of chimney stacks and pylons needs to be accurately assessed, particularly cumulatively with the other tall structures in the Vale.</p>	<p>Where possible MPL has sought to limit visual impacts by e.g. reducing the stack heights and numbers as much as possible and siting the generating equipment within Rookery pit.</p> <p>MPL can confirm that the electrical connection will be undergrounded, resulting in no additional pylons in the landscape.</p>
Need for Project	14	<p>Seven comments do not support non-renewable power generation and would rather see a renewable power Project being proposed. One comment suggests that there must already be sufficient back up.</p> <p>Four comments approve of the Project. Statements include that it is cleaner than coal, would help with the future needs of electricity and help with the energy crisis.</p>	<p>The need for new energy infrastructure, and fossil fuel infrastructure, is established in various UK Government policy and guidance, including NPS EN-1 and NPS EN-2.</p> <p>The need for the Project is also discussed in Chapter 1 of the ES (Document Reference 6.1).</p> <p>There is acknowledgement within Government policy and industry that established renewable technologies cannot provide the security of supply that consumers require. Further details are provided in the Planning Statement (Document 10.1).</p>

Theme	No. of comments	Summary of comments	Regard had to response in MPL ES and / or DCO Application
		One comment asked for more clarity on the benefits of the Project.	The proposed Heads of Terms agreement (Document Reference 10.3) proposes an Education and Employment Scheme as well as a Local Services scheme. The economic benefits of the Project are outlined in further detail in Chapter 14 of the ES (Document Reference 6.1). Other Project benefits are also outlined in the Planning Statement (Document Reference 10.1).
		One comment suggests the Project is a temporary fix and still emits CO2.	Need for new energy infrastructure, and fossil fuel infrastructure, is established in NPS EN-1 and NPS EN-2.
		One question asks how does the Project affect my future?	There is acknowledgement within Government policy and industry that established renewable technologies cannot provide the security of supply that consumers require. Further details are provided in the Planning Statement (Document 10.1).
<b>Ecology</b>	<b>14</b>	Four comments are concerned with local impact on habitats and wildlife. One comment goes on to state that the pit should be re-instated to reed beds as since	A full ecological assessment has been undertaken for the Project, including phase 1 studies and targeted species-specific phase 2 surveys. These surveys have built

Theme	No. of comments	Summary of comments	Regard had to response in MPL ES and / or DCO Application
		<p>ground works have begun there has been a loss of migrating birds in the area.</p>	<p>on previous assessments undertaken at the Project Site for other projects.</p> <p>No likely significant effects in respect of ecology have been identified as a result of construction, operation or decommissioning of the Project. See Chapter 8 of the ES (Document Reference 6.1).</p>
		<p>Three comments state that there is insufficient detail and principles behind ecological restoration plans and anticipated negative effects on ecology.</p>	<p>A full ecological assessment has been undertaken at the Project Site including phase 1 studies and targeted species specific phase 2 surveys. These surveys have built on previous assessments undertaken at the Project Site for previous projects.</p> <p>No likely significant effects in respect of ecology have been identified as a result of construction, operation or decommissioning of the Project. See Chapter 8 of the ES (Document Reference 6.1).</p>

Theme	No. of comments	Summary of comments	Regard had to response in MPL ES and / or DCO Application
		<p>One comment suggests the use of green walls on proposed buildings within the Project.</p>	<p>The design of any structures would be informed by MPL's design principles; these are set out in the Design and Access Statement (Document Reference 10.2). These principles seek to minimise the impacts of the Project on the environment and visual amenity.</p>
		<p>One comment states that they find it hard to believe that there are no invertebrates on the Site and that further study is required including looking into bats.</p>	<p>A full ecological assessment has been undertaken for the Project including phase 1 studies and targeted species specific phase 2 surveys. These surveys have built on previous assessments undertaken at the Project Site for other projects.</p> <p>The assessments have shown that development of the Project will not have any likely significant effects on the ecology of the area.</p> <p>No likely significant effects in respect of ecology have been identified as a result of construction, operation or decommissioning of the Project. See Chapter 8 of the ES (Document Reference 6.1).</p>



Theme	No. of comments	Summary of comments	Regard had to response in MPL ES and / or DCO Application
		<p>One comment states that there is an oak tree grown from an acorn that stands in the corner of the Site that they hope will not be removed.</p>	<p>MPL would like to keep the removal of trees to the minimum necessary in order to construct, operate and eventually decommission the Project.</p> <p>Discussions have been held with various stakeholders, including CBC and the Forest of Marston Vale in respect of tree planting and further details are set out in the ES (Document Reference 6.1).</p> <p>A Landscape and Ecology Mitigation and Management Strategy (LEMMS) has been prepared and can be found as an Appendix to the ES (Document Reference 6.2, Appendix 11.3). This sets out how landscaping has been used to limit visual impacts.</p>
		<p>From an ecological impact perspective, the information provided so far is insufficient. A better idea of the ecological importance of that area would have been shown by a map showing County Wildlife Sites and SSSIs, not just SSSIs. Although CWS is a non-statutory designation, planners are required</p>	<p>No likely significant effects in respect of ecology have been identified as a result of construction, operation or decommissioning of the Project. See Chapter 8 of the ES (Document Reference 6.1).</p> <p>Please refer to Figure 8.1 of the ES at Document Reference 6.3 for</p>

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		<p>to take account of them in decision-making and they do indicate the wider ecological value of an area.</p>	<p>maps showing the information requested.</p>
		<p>Given the proposed location is very close to existing wetlands of high ecological value, including resident and migrant bird populations, there is a further need to prevent new power lines causing problems for birds. Clear approaches to waterbodies are required for many species, including waders, ducks and geese. There is no evidence that the mapping of migration routes has been carried out and taken into account.</p>	<p>MPL can confirm that the electrical connection will be undergrounded, resulting in no additional pylons in the landscape.</p>
		<p>It was considered that there were a lot of archaeological and ecological matters which outweighed the overall purpose. In addition, as Covanta could still come on board there were concerns as both things would not be needed in one area. It was also considered that the existence of the power station might be used to justify further wind turbine installations.</p>	<p>MPL isn't responsible for and can't control other developments. Any new project would require its own consent which would also likely be subject to public consultation (depending on the type of consent required). The area surrounding the proposal is allocated within the Development Plan for development.</p>
<b>Design</b>	<b>11</b>	<p>Three comments propose that the energy Project should be solar,</p>	<p>The plant is designed to supplement the gaps in energy</p>

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		<p>wind or hydro rather than a non-renewable design such as gas.</p>	<p>delivery when, for example solar and wind are not generating sufficient electricity supply to meet demand.</p> <p>The need for new energy infrastructure, and fossil fuel infrastructure, is established in NPS EN-1 and NPS EN-2 and other UK Government policy and guidance. See the Planning Statement (Document 10.1) for further details.</p>
		<p>Three comments have no objections with the design and state that it has been well investigated.</p>	<p>MPL notes these comments.</p>
		<p>In reference to the gas fired power station that you are proposing for the Rookery South Site, I wonder whether alternative power generation sources have been considered? Specifically, has using the Site as a solar farm to generate electricity been considered instead of installing an on demand gas fired power station?</p>	<p>The plant is designed to supplement the gaps in energy delivery when, for example solar and wind are not generating sufficient electricity supply to meet demand.</p> <p>The need for new energy infrastructure, and fossil fuel infrastructure, is established in NPS EN-1 and NPS EN-2 and other UK Government policy and</p>

Theme	No. of comments	Summary of comments	Regard had to response in MPL ES and / or DCO Application
			guidance. See the Planning Statement (Document 10.1) for further details.
		Two comments require more deign detail on the dimensions of the proposed chimneys and the height of the proposed pylons. With one comment stating that the reduction in stack height is a benefit.	A table of dimensions is presented in Chapter 4 of the ES (Document Reference 6.1). The electrical connection will be undergrounded resulting in no additional pylons in the landscape.
		One comment asks how can the design be effective when it is proposed to be working on average 4 hours every day?	<p>The plant is designed to supplement the gaps in energy delivery when, for example solar and wind are not generating sufficient electricity supply to meet demand.</p> <p>The need for new energy infrastructure, and fossil fuel infrastructure, is established in NPS EN-1 and NPS EN-2 and other UK Government policy and guidance. See the Planning Statement (Document 10.1) for further details.</p>
		One comment states when selecting the gas turbine, they would prefer the industrial turbines over the aeroderivative turbines as	The worst case scenario (in terms of noise) of a single Gas Turbine Generator has been assessed in the ES. The use of industrial units is

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		<p>they give higher volumetric flow rate in stacks, and therefore greater buoyancy to the flue gases, so that they will disperse more effectively. Again, the industrial gas turbines will be quieter in total than the larger quantity of aero-derivative turbines.</p>	<p>only likely to make a very marginal difference in operational noise.</p> <p>A full noise assessment has been undertaken in Chapter 7 of the ES (Document Reference 6.1).</p> <p>The noise assessment at Chapter 7 of the ES (Document Reference 6.1) states that there are no likely significant effects at the nearest noise sensitive receptors.</p> <p>The air quality assessment has shown that the Project will not result in any likely significant environmental effects in relation to air quality either as a standalone Project or cumulatively with other projects. See Chapter 6 of the ES (Document Reference 6.1).</p>
<b>Transport</b>	<b>31</b>	<p>Baseline pedestrian and cyclist data needs to be reassessed. Data that predates the opening of Kimberly College must be inaccurate. It needs to cover weekdays in term time.</p>	<p>Traffic and pedestrian / cycle surveys were undertaken in October and November 2014. A detailed assessment of transport impacts is contained in Chapter 12 of the ES (Document 6.1) and the data on which this assessment has been based has been agreed as</p>

Theme	No. of comments	Summary of comments	Regard had to response in MPL ES and / or DCO Application
			sufficient and up to date with key stakeholders.
		<p>Access to Gas and Electrical Connections Should not be made via the A507 into Sandhill Close in Millbrook Village. Sandhill Close has a 7.5t weight and 6'6 width restriction. The route should be the same as the designated route to Millbrook Proving Ground.</p>	Figure 12.2 of the ES (Document Reference 6.2) shows the proposed construction routes for transport. Consultation of these routes has been undertaken as shown in Table 12.1 within the ES (Document Reference 6.1).
		<p>Any activity that brings further traffic to this area is not welcome. Currently in spite of a weight and width restriction to Millbrook a great deal of traffic breaching these limits use Millbrook as a short cut from the A507 to the area of your proposed Site.</p> <p>Until there is protection for Millbrook and a general improvement to the roads in the area I cannot support this development.</p>	Figure 12.2 of the ES (Document Reference 6.2) shows the proposed construction routes for transport. Consultation of these routes has been undertaken as shown in Table 12.1 within the ES (Document Reference 6.1).
		Nine comments state that they object in general to an increase in	There will be an increase in construction traffic during the 22-month construction phase, but this will be temporary. Once

Theme	No. of comments	Summary of comments	Regard had to response in MPL ES and / or DCO Application
		<p>traffic in the area. Mentioning that no traffic comes through Stewartby</p>	<p>operational, there will be very minimal additional traffic movements. Neither the construction nor the operational phase will result in significant increases in current traffic levels.</p> <p>Further information is provided in Chapter 12 of the ES (Document Reference 6.1).</p>
		<p>Six comments object to the Project due to the impact on the transport network during construction. Stating the following:</p> <ul style="list-style-type: none"> <li>■ Local infrastructure is inadequate</li> <li>■ Marston Moretaine to be avoided by construction vehicles</li> <li>■ The school bus that uses Green Lane would be affected</li> <li>■ Impact on Stewartby to be considered</li> <li>■ Consider delivering materials to Site by rail</li> </ul>	<p>There will be an increase in construction traffic during the 22-month construction phase, but this will be temporary. Once operational, there will be very minimal additional traffic movements. Neither the construction nor the operational phase will result in significant increases in current traffic levels.</p> <p>A Construction Traffic Management Plan (CTMP) will be produced prior to construction to ensure as little impact as possible on the local area. This is a requirement of the draft DCO (Document Reference 3.1). An Outline CTMP has been produced as part of the DCO Application</p>

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			(Document Reference 6.2, Appendix 12.4).
		Six comments suggest that Green Lane be used for all activity/connections however it needs improvement/re-surfacing.	<p>The final traffic routes are outlined in ES Chapter 12 of the ES (Document Reference 6.1). The consultation process highlighted concerns of the local people resulting in MPL removing the options Manor Road and Sandhill Close for construction routing.</p> <p>MPL can confirm that it will use Green Lane as their primary access in respect of construction activity.</p>
		One comment asks if the Project will affect traffic into Marston Moretaine?	<p>The final traffic routes are outlined in Chapter 12 of the ES (Document Reference 6.1). The consultation process highlighted concerns of the local people resulting in MPL removing the options Manor Road and Sandhill Close for construction routing.</p> <p>This assessment has shown that, with the exception of a short duration (1 to 2 days) of peak construction activity for the Power Plant, the Project will not result in</p>



Theme	No. of comments	Summary of comments	Regard had to response in MPL ES and / or DCO Application
			<p>any likely significant environmental effects in relation to traffic either as a standalone Project or cumulatively with other projects.</p> <p>During the peak construction time, there would be a slight adverse effect for high sensitivity receptors on Green Lane (e.g. Kimberley College). However, this is not significant and would only last for 1-2 days.</p>
		<p>One comment states that there is restricted HGV access through Millbrook village as a result of a planning consent for Millbrook Test Track and that this is relevant to construction option 5.</p>	<p>Construction traffic will not be routed through Millbrook Village.</p>
		<p>One comment states that access to Flitwick rail station, which is accessed via Station Road and Station Lane, will be unbearable with extra traffic as the single carriageway cannot support that capacity.</p>	<p>There will be an increase in construction traffic during the 22-month construction phase, but this will be temporary. Once operational, there will be very minimal additional traffic movements. Neither the construction nor the operational phase will result in significant increases in current traffic levels.</p>

Theme	No. of comments	Summary of comments	Regard had to response in MPL ES and / or DCO Application
			<p>This assessment has shown that, with the exception of a short duration (1 to 2 days) of peak construction activity for the Power Plant, the Project will not result in any likely significant environmental effects in relation to traffic either as a standalone Project or cumulatively with other projects.</p> <p>During the peak construction time, there would be a slight adverse effect for high sensitivity receptors on Green Lane (e.g. Kimberley College). However, this is not significant and would only last for 1-2 days.</p>
		<p>One comment states that the Oxford – Cambridge rail studies could impact access arrangements</p>	<p>MPL are in communication with Network Rail as to their plans for future works. However, the majority of these planned works in the vicinity of the Project Site are at such an early stage that there are no firm details to be able to consider alongside the Project, or to produce a cumulative impact assessment of the two schemes together.</p>

Theme	No. of comments	Summary of comments	Regard had to response in MPL ES and / or DCO Application
		<p>One comment raises concern about heavy traffic over level crossings</p>	<p>A Construction Traffic Management Plan (CTMP) will need to be agreed with the local authority which is achieved through a requirement in the draft DCO (Document Reference 3.1). An Outline CTMP is included in the appendices of the ES (Document Reference 6.2, Appendix 12.4). Discussions have been ongoing with Network Rail with regard to the level crossings.</p> <p>This assessment has shown that, with the exception of a short duration (1 to 2 days) of peak construction activity for the Power Plant, the Project will not result in any likely significant environmental effects in relation to traffic either as a standalone Project or cumulatively with other projects.</p> <p>During the peak construction time, there would be a slight adverse effect for high sensitivity receptors on Green Lane (e.g. Kimberley College). However, this is not significant and would only last for 1-2 days.</p>

Theme	No. of comments	Summary of comments	Regard had to response in MPL ES and / or DCO Application
		<p>One comment states that the railway stations should be improved to benefit workers.</p>	<p>It is considered that the Project will not have an impact on the nearby railway stations. A Construction Traffic Management Plan (CTMP) will need to be agreed with the local authority which is achieved through a requirement in the draft DCO (Document Reference 3.1). An Outline CTMP is included in the appendices of the ES (Document Reference 6.2, Appendix 12.4).</p> <p>MPL intend that a number of construction and operation workers will be locally sourced where they are suitable qualified.</p> <p>MPL, prior to commencement of construction, seek to deliver a local service provider engagement scheme (the "Local Services Scheme") to CBC for approval. The Local Services Scheme will set out:</p> <ul style="list-style-type: none"> <li>■ The measures that MPL will take in order to ensure that opportunities for local organisations to bid for contracts during the construction period of the Project are advertised locally (including MPL notifying CBC</li> </ul>

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			<p>at the commencement of the procurement process for construction of the Project in order to allow the Council to advertise opportunities via any brokerage scheme that it may run);</p> <ul style="list-style-type: none"> <li>■ The measures that MPL will take in order to ensure that opportunities for local organisations to bid for contracts during the operational period of the Project (for example for maintenance, waste, cleaning or security services) are advertised locally (including MPL notifying CBC at the commencement of the procurement process for operation of the Project in order to allow the Council to advertise opportunities via any brokerage scheme that it may run); and</li> <li>■ The anticipated number of local supplier days that will be hosted by MPL prior to and</li> </ul>

Theme	No. of comments	Summary of comments	Regard had to response in MPL ES and / or DCO Application
			during construction of the Project.
		One question asks what relevance does Figure 14.1 Drivetime Zones Have? As they understand that truck movements would be negligible once the plant was built.	ES Figure 14.1 (Document 6.2) relates to socio-economics and shows drive time from the Project Site as a way of assessing areas which could potentially benefit from job creation and use of services.
		One comment states that vehicle movements on Manor Road, Kempston Hardwick are of concern as a 7.5 tons' weight limit exists	These construction route options have been dropped from the MPL Project.
<b>PROW</b>	<b>3</b>	One comment asks where the Project is and what happens to any footpaths?	<p>The majority of the Project is located within Rookery South Pit. The electrical connection and the gas connection will be located outside of the pit.</p> <p>There will be no permanent diversion of footpaths as a result of the Project.</p>
		One comment mentions that there has been no mention of the footpaths that are required to be constructed as part of the low level restoration of Rookery Pit in the	Public Rights of Way have been identified within Chapter 12 of the ES (Document Reference 6.2) and

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		<p>PER. The paths are set out on a plan attached to the S106 agreement (and attached here). The ROMP permission (BC/CM/2000/8) for Rookery Pit should be on the council website but I'm not sure that it is. There is some difficult with some of the permissions that have numbering from the former county council.</p>	<p>include those to be constructed as part of the LLRS scheme.</p>
<b>Cumulative Impact</b>	<b>8</b>	<p>Other projects that should be assessed cumulatively should include:            Permitted expansion at Millbrook Proving Ground.            Expansion of Wootton Village.            E-W Rail Project            Application to Beds Borough for a single 90m turbine at Stewartby Landfill            NIRAH</p> <p>Four comments state that a recycling plant/Incinerator has already been approved and this Project would add to the cumulative impact in the area which is turning into an industrial zone. Some comments state that the gas power station is favoured</p>	<p>A list of the Projects which have been included in the cumulative assessment is included in Chapter 4 of the ES (Document Reference 6.1).</p> <p>A cumulative impact assessment has been undertaken, details of which can be found in the ES (Document Reference 6.1). This includes the Covanta Rookery South RRF and other projects</p>

Theme	No. of comments	Summary of comments	Regard had to response in MPL ES and / or DCO Application
		over the incinerator if they can choose one. Also cumulative impact on traffic is specifically mentioned.	which are listed in Chapter 4 of the ES.
		Two comment is concerned about the cumulative impact of so many potential projects within Rookery South Pit especially once the access road is built the Site becomes more affordable.	A cumulative impact assessment has been undertaken, details of which can be found in the ES (Document Reference 6.1). This includes the Covanta Rookery South RRF and other projects which are listed in Chapter 4 of the ES.
		One comment states that population increase figures need to be revised to take account of planning permissions and designations	The statistics for population increase presented relate to a wide area.
<b>Safety</b>	<b>4</b>	One comment states the Project will need access for emergency equipment and vehicles.	An emergency access track to the South of Rookery South Pit is being completed as part of the LLRS.
		One comment states that the Project is a fire hazard	Gas-fired power stations have been operating safely in the UK for the past 30 years.



Theme	No. of comments	Summary of comments	Regard had to response in MPL ES and / or DCO Application
		One comment states that the proposed electrical connection would carry high voltage should an accident occur.	High voltage lines are located throughout the UK. They are owned and operated by National Grid.
		One comment states the need for a local call procedure in case of emergencies.	<p>MPL notes this comment. An outline CEMP, (Document Reference 6.2, Appendix 3.2) outlines procedures to follow in the event of an emergency during construction.</p> <p>During operation, any deviation from normal operating conditions (e.g. emission limits above those set by an operating permit) would be alarmed and deal with immediately. In extreme cases, the Generating Equipment would be shut down if it was not operating correctly, until the issue was rectified.</p>
<b>Agricultural</b>	<b>1</b>	One comment states that the Project should minimise the loss of agricultural land.	MPL acknowledge this comment and the Project achieves this where possible. The Power Generation Plant will not result in loss of agricultural land. The electrical and gas connections will

Theme	No. of comments	Summary of comments	Regard had to response in MPL ES and / or DCO Application
			<p>be buried resulting in temporary loss of agricultural land.</p> <p>During consultation MPL has opted to move the AGI location to a preferred location of the landowner to reduce the impact on agricultural operations.</p>
<p><b>Cultural Heritage and Archaeology</b></p>	<p><b>4</b></p>	<p>It was considered that there were a lot of archaeological and ecological matters which outweighed the overall purpose. In addition, as Covanta could still come on board there were concerns as both things would not be needed in one area. It was also considered that the existence of the power station might be used to justify further wind turbines installations.</p> <p>In the case of Houghton House and Ampthill Castle the setting of the heritage asset within the wider Vale was critical. These 2 heritage assets have a very strong interaction with the surrounding countryside, and should be assessed accordingly. Ampthill</p>	<p>MPL isn't responsible for and can't control other developments. Any new project would require its own consent which would also likely be subject to public consultation (depending on the type of consent required). The area surrounding the proposal is allocated within the Development Plan for development.</p> <p>The impact on heritage assets has been considered in Chapter 13 of the ES (Document Reference 6.1).</p>

Theme	No. of comments	Summary of comments	Regard had to response in MPL ES and / or DCO Application
		<p>Park is a Capability Brown Landscape.</p> <p>Grade II listed buildings Table 13.7 LB8. This statue cannot be considered without its context at Ampthill Park House. The 2km boundary is therefore unhelpful in this instance, and should be extended.</p> <p>The impact on the individual key heritage assets should be separately assessed, and not lumped together in a table.</p>	
		<p>One question asks whether The Rookery is a historic site?</p>	<p>The Rookery is a surviving example of a former pit used to support the brick works in the area. Effects on it have been assessed in Chapter 13 of the ES (Document Reference 6.1).</p>
		<p>One comment states that Ampthill Park is a Capability Brown Grade II listed park that has recently has received £600k of lottery funding through English Heritage. The view from and the setting of this park will be impacted by the proposed Project.</p>	<p>Photographs have been taken and photomontages produced from the park showing how the Project will be viewed from that location.</p>

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<b>Policy</b>	<b>1</b>	Marston Vale Growth Area is no longer a designation.	MPL notes this comment.

## **Appendix 5.G: Phase 2 Section 47 statutory consultation respondents' comments and the MPL response**

Theme	No of comments	Summary of comments	Regard had to response in MPL ES and / or DCO Application
Air quality	19	Six comments express concerns that the estimated impacts on air quality will have adverse effects on human health.	MPL acknowledge these comments and a full air quality impact assessment has been undertaken and is presented in Chapter 6 of the ES which demonstrates that the Project will not cause significant air quality effects on human health.
		Four comments express concerns that the Project will have an adverse impact on air quality.	
		One comment questions what prevailing wind direction has been assumed in the air quality assessment.	MPL acknowledges this comment. The air quality assessment presented in Chapter 6 of the ES has taken into consideration 5-years' worth of local meteorological data, collected at the closest weather station to the Project Site (Cranfield) and an analysis of this data has shown that the predominant prevailing wind is from the south west.
		Two comments express concern that stack emissions may have an adverse effect on Ampthill.	MPL acknowledges these comments and a full air quality impact assessment has been undertaken (Chapter 6 of the ES) and has demonstrated no significant air quality effects from the plant on human health including residents in Ampthill.
		Two comments were received regarding air quality standards: <ul style="list-style-type: none"> <li>Can the site meet air quality standards with 2 projects proposed to be constructed?</li> </ul>	MPL acknowledges these comments and a full air quality impact assessment has been undertaken and is presented in Chapter 6 of the ES. This includes a cumulative assessment of the Project operating alongside Covanta. This assessment has demonstrated

		<ul style="list-style-type: none"> <li>The project would breach government guidelines on carbon emissions after 2020 so the Project will have a non-existent shelf life.</li> </ul>	<p>that no significant cumulative air quality effects are predicted.</p> <p>MPL can confirm that the Project will be designed to meet all relevant emissions targets (including CO2).</p>
		<p>Four comments were received regarding the air quality impact assessment method:</p> <ul style="list-style-type: none"> <li>Three comments state the method should take account of the fact that in the past, pollution from the brickworks affected air quality in Ampthill;</li> <li>One comment stated that baseline data provided by Covanta is not considered to be accurate.</li> </ul>	<p>MPL acknowledges these comments and a full air quality impact assessment has been undertaken and is presented in Chapter 6 of the ES. This has demonstrated no significant air quality effects from the plant on human health. The emissions from the Power Generation Plant will be of a significantly different type compared to emissions from Covanta and so the same issues will not be experienced.</p> <p>MPL cannot comment on the accuracy or otherwise of the baseline data used by Covanta.</p>
<b>Transport</b>	<b>28</b>	<p>Eight comments state that additional traffic generated by the Project during the construction and operational phases will have an adverse impact on the local highway network.</p>	<p>MPL acknowledges these comments and a full traffic and transport assessment has been undertaken and is presented in Chapter 12 of the ES as well as the Transport Assessment (Appendix 12.1 of the ES). These assessments fully describe impacts on the local road network both from the Project in isolation and cumulatively with other developments and both during operation and construction of the Project. The assessment has not shown any likely significant adverse effects.</p>

		<p>Six comments were received regarding cumulative transport impacts:</p> <ul style="list-style-type: none"> <li>• 2 comments state that local infrastructure will not be able to cope with the cumulative demand from recent new developments in the local area and the Project.</li> <li>• The Wootton Fields Development, the Covanta Incinerator and the Project will have cumulative transport impacts;</li> <li>• Avoid construction works and traffic on different developments being carried out in parallel;</li> <li>• The Project will add to traffic generated by Covanta;</li> <li>• Minimise the number of vehicle movements.</li> </ul>	<p>MPL acknowledges these comments and a full traffic and transport assessment has been undertaken and is provided in Chapter 12 of the ES as well as the Transport Assessment (Appendix 12.1 of the ES). These assessments fully describe impacts on the local road network both from the Project in isolation and cumulatively with other developments including Covanta. The assessment has not shown any likely significant adverse effects.</p> <p>Measures to minimise the number of vehicle movements are set out in the TA which include car sharing.</p> <p>A cumulative assessment of potential traffic impacts between the Project and other relevant committed developments, including the Covanta RRF Project, is provided in Chapter 12 of the ES (Document Reference 6.1).</p>
		<p>One comment states it is nice to find that it [the Project] will only be operational at peak times.</p>	<p>Noted.</p>
		<p>Three comments state that the local road network is already very busy.</p>	<p>MPL acknowledges these comments and a full traffic and transport assessment has been undertaken and is provided in Chapter 12 of the ES as well as a Transport Assessment (Appendix 12.1 of the ES). These assessments fully describe impacts on the local road network both from the Project in isolation and cumulatively with other developments. The assessment has not</p>



			<p>shown any likely significant adverse effects. Traffic surveys were carried out on the local road network near to the Project Site in both 2014 and 2017.</p> <p>Measures to minimise the number of vehicle movements are set out in the Transport Assessment, which include car sharing.</p>
		<p>Four comments state that air pollution caused by an increase number of vehicles on the road is a concern.</p>	<p>MPL acknowledges these comments. The air quality assessment contained in Chapter 6 of the ES has assessed traffic movements and given the relatively small number of movements and short construction period, no likely significant effects are anticipated.</p>
		<p>Four comments were received regarding the routing of construction traffic:</p> <ul style="list-style-type: none"> <li>• One comment requests that the Project should avoid lorry runs.</li> <li>• Two comments state construction traffic should be routed along the new A421 at J13 of the M1 as opposed to the old A421;</li> <li>• One comment states that the A421/A428 Marsh Leys interchange is better suited to accommodate HGV's than the A421/Marston Moretaine interchange.</li> </ul>	<p>MPL acknowledges these comments. The proposed construction and access routes have been developed in discussion with relevant consultees (including Highways England) and represent the most appropriate and suitable methods of getting to the Project site whilst minimising impact on the local road network and local villages.</p>
		<p>One comment states that Preliminary Environmental Report tables 12.7 &amp; 12.8 are not clear - are the figures shown daily</p>	<p>MPL acknowledges this comment and the tables have been checked and amended as appropriate in the ES.</p>

		averages? Also, typo 1,1000 should be 11,000?	
		One comment states that the PEIR does not recognise that there is a cycleway running along the c94 south of Green Lane.	MPL acknowledges this comment and this has been checked and updated as appropriate in the ES.
<b>Site selection</b>	<b>19</b>	<p>Fourteen comments received oppose the site selection, reasons include:</p> <ul style="list-style-type: none"> <li>• Five comments state that there is already too much new development in the local area, including new homes and the Covanta Project;</li> <li>• One comment states the site is not appropriate for a station of this size;</li> <li>• Six comments state that the Project should not be located in proximity to existing homes, communities and towns;</li> <li>• One comment states the Project should be located along the coastline;</li> <li>• One comment states the Vale of Marston topography creates a bowl effect which exacerbates harmful effects.</li> </ul>	<p>MPL acknowledges these comments. The reasons for the choice of Project site are clearly set out in Chapter 5 of the 2017 PEIR and the Chapter 5 of the ES. The site has been chosen following a lengthy and extensive search by the project team and the suitability of the site is a combination of:</p> <ul style="list-style-type: none"> <li>• Proximity to gas and electrical connections;</li> <li>• Brownfield land;</li> <li>• Within a pit, so limiting visual effects; and</li> <li>• Allocated for development by CBC in their local plan.</li> </ul> <p>The air quality assessment (Chapter 6 of the ES) has not predicted any likely significant effects from emissions despite the Power Generation Plant being located in a 'bowl'.</p>
		One comment states that there must be more suitable sites for the Project.	

		Three comments state that MPL should consider other sites for the Project.	
		One comment states that it would be preferable for no development to take place on the site at all.	
<b>Noise</b>	<b>10</b>	Six comments state that noise impacts are a concern.	MPL acknowledges these comments. A full noise assessment has been undertaken and is provided in Chapter 7 of the ES. Following publication of the 2017 PEIR, MPL investigated potential available mitigation methods to limit noise effects. By using different plant items with better acoustic characteristics, no likely significant effects from noise are anticipated during construction or operation of the Project.
		One comment states that local residents should be provided with further information on noise impacts.	
		One comment states that the local area already suffers from noise issues.	MPL acknowledges this comment. The noise assessment presented in Chapter 7 of the ES takes into consideration the existing baseline conditions, as well as cumulative effects with other planned developments in the area. No likely significant effects from noise are anticipated during construction or operation of the Project.

		<p>Two comments received on the noise mitigation measures:</p> <ul style="list-style-type: none"> <li>the information just states that mitigation measures will be required but the anticipated noise level at your closest receptor is not defined;</li> <li>noise limits should be agreed.</li> </ul>	<p>MPL acknowledges these comments and confirm that noise limits would be agreed as part of the Requirements attached to the DCO, which would bind the developer to meet certain noise criteria at specific locations.</p>
<b>Ecology</b>	<b>13</b>	<p>Ten comments expressed concern over the potential impacts on wildlife, natural habitats and the environment generally.</p>	<p>MPL acknowledges these comments. A detailed ecological assessment of the Project Site and surrounding area has been undertaken which included a phase 1 desk study and site walkover, followed by phase 2 protected species surveys. The resulting analysis presented in Chapter 8 of the ES has revealed that the Project would not give rise to significant effects on ecological species or habitats at the site or in the surrounding area.</p>
		<p>One comment questioned whether the Project Site would be returned for nature habitat (for birds etc).</p>	<p>MPL confirm that upon decommissioning, the site would be reinstated to a similar condition as before construction. Habitat creation would take place as part of the development of the Project. This is described in the Landscape and Ecology Mitigation and Management Strategy document (Appendix 11.3 of the ES) which includes for the provision of planting and pond creation.</p>
		<p>One comment suggests that RSPB should be consulted to ensure that the proposed</p>	<p>The RSPB are not a statutory consultee for the purposes of the Project. Natural England and the relevant local authorities have been</p>

		planting and landscaping scheme provides an 'optimum' environment for bird species.	consulted in relation to matters relating to potential effects on ecological receptors. Chapter 8 of the ES provides an assessment of potential effects on breeding birds, which concludes that there would be no likely significant effects providing mitigation measures of timing construction works outside of breeding and nesting bird seasons is followed.
		One comment recognises that the proposed new ponds and planting will make a positive contribution to the habitat of bird species.	MPL agrees and considers that no further action is required to resolve this comment.
<b>Health</b>	<b>17</b>	Sixteen comments express concern that emissions from the operation of the Project and increased vehicle movements would have an adverse impact on the health of the local population.	MPL acknowledges these comments. A full air quality impact assessment has been undertaken (Chapter 6 of the ES) and has demonstrated no significant air quality effects from the Project on human health. The air quality assessment has assessed traffic movements and given the relatively small number and short construction period, no likely significant impacts are anticipated.
		One comment questioned if the Project can meet air quality standards in combination with other projects.	MPL acknowledges this comment. A full air quality impact assessment has been undertaken (Chapter 6 of the ES) and has included a cumulative assessment of the Project operating alongside Covanta. This assessment has demonstrated no significant air quality effects cumulatively.

<b>Cumulative impact</b>	<b>4</b>	One comment states that the impacts of the Project will amplify the impacts of the Covanta Project.	Chapters 6 to 14 of the ES present cumulative assessments for each environmental topic which clearly assess and present the combined impacts of the Project and Covanta.
		One comment questions whether the Project will assist in securing the Covanta development.	The Project and the Covanta scheme (consented under the RRF Order) are independent projects, promoted by separate developers. There are interactions between the two schemes, e.g. sharing an access, which are described in full in Chapter 10 of the Consultation Report (Document Reference 5.1). The Project being granted a DCO has no bearing on whether the already consented Covanta scheme will be constructed or not.
		One comment states that they are opposed to the Project on the basis of combined impacts from Covanta and the Project.	MPL acknowledges this comment. Chapters 6 to 14 of the ES present cumulative assessments for each environmental topic which clearly assess and present the combined impacts of the Project and Covanta.
		One comment expresses concern that the Project may increase the environmental burden of existing waste facilities in Bedfordshire.	MPL acknowledges this comment. Chapter 15 of the ES demonstrates that the construction, operational and decommissioning phases of the Project will generate limited waste and that the Project will operate in full accordance with the Waste Framework Directive and the Waste (England and Wales) Regulations 2011 (where relevant).
<b>Landscape</b>	<b>8</b>	One comment states that the Project will damage the heritage value of the area.	MPL acknowledges this comment. A detailed assessment has been undertaken of the archaeology and cultural heritage of the site and surrounding area (Chapter 13 of the ES)

			and has found no likely significant effects arising from the Project.
		One comment expresses concern that the Project will harm the landscape value of the countryside.	MPL acknowledges this comment. A detailed assessment has been undertaken of the potential impacts of the Project on landscape value (Chapter 11 of the ES) which finds that no likely significant effects are anticipated.
		One comment states that there is insufficient tree cover to screen the Project.	MPL acknowledges these comments. Additional tree planting will take place, as outlined in the Landscape and Ecology Mitigation and Management Strategy (Appendix 11.3 of the ES). This has been designed to provide additional screening and visual mitigation for the Project.
		Three comments state the Project should include planting to screen the development.	
		One comment states that the height of the Project is significantly lower than the Covanta development.	MPL acknowledges these comments and considers that no further action is required to resolve these comments.
		One comment states visual impact is not a concern.	
<b>Consultation</b>	<b>11</b>	Two comments questioned if the community consultation undertaken was sufficient: <ul style="list-style-type: none"> <li>• holding one exhibition in each village would not meet the statutory requirement.</li> <li>• The exhibition (in Lidlington) was not open for long enough to allow</li> </ul>	MPL acknowledges these comments. The relevant regulations and DCLG Guidance is not prescriptive on the format of consultation. MPL considers that the approach to consultation is proportionate to the scale of the Project. CBC and BBC both agreed that the Phase 2 Consultation Plan and SoCC provide sufficient scope for community engagement as evidenced in Appendix 2.C.iv and Appendix

		people working during the day time to attend.	2.C.v of the Consultation Report (Document Reference 5.1).
		One comment expressed that they would like to receive further updates on the Project.	MPL propose to set up a Community Liaison Group in order for local residents and other stakeholders to be kept informed of developments with regard to the Project.
		Two comments made suggestions for future consultation events: <ul style="list-style-type: none"> <li>• MPL should provide sealed envelopes for consultation feedback forms in future;</li> <li>• Provide a comparison on the various figures (emissions/vibrations/air quality) to give greater meaning to the general public.</li> </ul>	MPL acknowledges these comments and will take them into consideration when planning future consultation exercises.
		Two comments stated that the exhibition material provided a clear vision of the project and demonstrates that the Project has been influenced by previous public feedback.	MPL acknowledges this comment. Chapter 11 of the Consultation Report (Document Reference 5.1) demonstrates how feedback received from early Phase 1 non-statutory consultation influenced the format of later consultation phases.
		Two comments state that the consultation documents provide a thorough assessment of the proposals.	MPL acknowledges this comment. Chapter 11 of the Consultation Report (Document Reference 5.1) explains how MPL have sought to balance the requirement to consult early on in the process while providing sufficient information to allow consultees to gain a good level of understanding about the Project.



		One comment states that they were not made aware of the Project during the Phase 1 consultation.	MPL acknowledges this comment. Chapter 6 of the Consultation Report (Document Reference 5.1) explains how MPL undertook extensive publicity for the Project at the national and local level in full accordance with the requirements of the PA 2008.
<b>Socio economics</b>	<b>6</b>	Three comments state that the economic benefits to the local community will be minor.	MPL acknowledges this comment. Chapter 14 of the ES identifies that there will be opportunities for local construction workers (skilled and unskilled) to be involved in the Project, which is considered to equate to a minor beneficial impact overall.
		One comment questions how the estimation that the Project will contribute millions of pounds to the local economy was calculated.	The Project would cost in excess of 100 million pounds to build, which would include a mix of labour, materials, plant and expertise. Some of this could be sourced locally. Additionally, the construction period of 22 months would generate local employment opportunities and also have 'knock on' financial benefits from construction staff spending money within the local area on e.g. food and accommodation. Further information regarding the methodology is set out in Chapter 14 of the ES.
		Three comments regarding local employment opportunities: <ul style="list-style-type: none"> <li>• hope the project will be manned by local people;</li> <li>• surprised it will only take 15 permanent skilled jobs to run &amp; maintain the facility;</li> </ul>	MPL acknowledges these comments. The operation of the Project is largely automated, hence the relatively low staff numbers needed during operation.  Chapter 14 of the ES identifies that the Project will generate the equivalent of 9.2 permanent Full-time Equivalent (FTE) construction jobs.

		<ul style="list-style-type: none"> <li>minimal employment opportunities.</li> </ul>	
<b>Environmental impact assessment</b>	<b>6</b>	One comment states that the assessment does not account for the significant amount of new housing development in the area.	MPL acknowledges this comment. The baseline conditions of the assessments carried out in Chapters 6 to 15 of the ES have been updated to reflect the latest position in terms of housing and other developments. The cumulative assessment in the ES also takes account of new housing that is planned to be built in the future.
		Three comments object to the Project on the basis of the estimated environmental impacts.	MPL acknowledges these comments. The EIA process and Chapters 6 to 15 of the ES have been prepared to assess all likely significant environmental effects as agreed at the EIA Scoping stage of the Project.
		One comment expresses doubt over the likely environmental impacts.	MPL acknowledges this comment. The EIA has been undertaken using standard and well established best practice assessment techniques to ensure that the impacts can be estimated with the best possible accuracy.
		One comment states that the assessment lifetime of the Project is not stated in the consultation material.	The Project is assumed to have a lifetime of 25 years. This was stated in Chapter 3 of the 2017 PEIR.
<b>Design</b>	<b>6</b>	Three comments support the decision to reduce the number and/or height of stacks.	MPL acknowledges these comments and considers that no further action is required to resolve this comment.

		Two comments state that the design of the Project has been improved.	MPL acknowledges these comments and considers that no further action is required to resolve this comment.
		One comment suggests that the design should be amended to include solar panels on the roof of the development.	MPL acknowledges this comment however there is limited roof space available on plant items, particularly when maintenance requirements are considered, meaning solar panels are not feasible in this case.
<b>Community Benefit</b>	<b>2</b>	Two comments state that there will not be any benefit to the community.	As detailed in Chapter 14 of the ES, there are considered to be economic benefits arising as a result of the Project through increased employment opportunities. MPL also propose to implement an Education Scheme to support local educational establishments (please see MPL's Statement of proposed Heads of Terms for an agreement pursuant to s106 Town and Country Planning Act 1990
<b>Policy</b>	<b>1</b>	One comment states that the Project will need to reflect emerging proposals in the Draft Central Beds Local Plan - four new villages are planned.	MPL acknowledges this comment and Chapter 5 of the Planning Statement (Document Reference 10.1) demonstrates that regard has been had to the Draft Central Beds Local Plan as a relevant material consideration. MPL has also proactively engaged in the Local Plan making process having submitted representations to the Council during the Draft Central Beds Local Plan Regulation 18 consultation (July to August 2017). Furthermore, additional housing in the area will increase demand for electricity locally and the Project will potentially assist in meeting such additional local demand for electricity.

<b>Waste</b>	<b>1</b>	One comment expresses concern that the Project may increase the environmental burden of existing waste facilities in Bedfordshire.	MPL acknowledges this comment. Chapter 15 of the ES demonstrates that the construction, operational and decommissioning phases of the Project will generate limited waste and that the Project will operate in full accordance with the Waste Framework Directive and the Waste (England and Wales) Regulations 2011 (where relevant).
<b>Other</b>	<b>24</b>	<p>MPL received a range of other responses from s47 consultees which do not relate to any of the main topic themes, these other themes include:</p> <ul style="list-style-type: none"> <li>• Two comments on the Covanta project;</li> <li>• One comment on financial considerations;</li> <li>• Five comments support the Project generally;</li> <li>• Nine comments oppose the Project generally;</li> <li>• Five comments in relation to the need for the Project; and</li> <li>• One comment regarding the applicant.</li> </ul>	<p>MPL considers that the interaction between the Project and the Rookery South RRF (Covanta) project has been clearly set out during the Phase 1 and Phase 2 consultation as detailed in Chapter 10 of the CR (Document reference 5.1)</p> <p>MPL acknowledges that the Project has gained support and opposition from the local community. Chapters 7 and 9 of the CR (Document reference 5.1) provide a summary of feedback from the local community from the Phase 1 and Phase 2 consultation respectively.</p> <p>MPL acknowledges the comments on need, however the Planning Statement (Document reference 10.1) identifies that the need for the Project is established in national policy, including in NPS EN-1.</p>