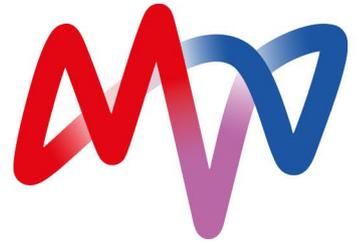


Medworth Energy from Waste Combined Heat and Power Facility

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Revision 1.0
July 2022



Consultation Report

July 2022

Regulation reference: The Infrastructure
Planning (Applications: Prescribed
Forms and Procedure) Regulations
2009 Regulation 5(2)(q)

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Executive Summary

The Project

Medworth CHP Limited (the Applicant) is applying to the Secretary of State (SoS) for a Development Consent Order (DCO) to construct operate and maintain an Energy from Waste (EfW) Combined Heat and Power (CHP) Facility on the industrial estate, Algores Way, Wisbech, Cambridgeshire. Together with associated Grid Connection, CHP Connection, Access Improvements, Water Connections, and Temporary Construction Compound (TCC), these works are the Proposed Development.

The Proposed Development would recover useful energy in the form of electricity and steam from over half a million tonnes of non-recyclable (residual), non-hazardous municipal, commercial and industrial waste each year. The Proposed Development has a generating capacity of over 50 megawatts and the electricity would be exported to the grid. The Proposed Development would also have the capability to export steam and electricity to users on the surrounding industrial estate.

The Proposed Development is a Nationally Significant Infrastructure Project (NSIP) under Part 3 Section 14 of the Planning Act 2008 (2008 Act) by virtue of the fact that the generating station is located in England and has a generating capacity of over 50 megawatts (section 15(2) of the 2008 Act). It, therefore, requires an application for a DCO to be submitted to the Planning Inspectorate (PINS) under the 2008 Act.

Summary of the Approach to Consultation

The Applicant has given careful consideration to the specific requirements set out in the following legislation:

- The Planning Act 2008;
- The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations); and
- The Infrastructure Planning (Applications, Prescribed Forms and Procedures) Regulations 2009 (the APFP Regulations).

Sections 42 to 50 of the Planning Act 2008 (Part 5, Chapter 2) set out requirements for statutory pre-application consultation in relation to a proposed application for a DCO.

The Applicant has undertaken a multi-stage pre-application consultation process to ensure that consultees had the opportunity to provide feedback at appropriate points in the development of the Proposed Development. The stages of consultation undertaken were:

- Stage 1 Consultation (16 March to 4 May 2020): This comprised the first non-statutory stage of consultation on the emerging proposals for the Proposed Development. The consultation was undertaken at an early stage in the project development process, to provide consultees with an opportunity to influence the proposals.



- Due to the COVID-19 pandemic and the associated social restrictions, the public exhibitions proposed as part of the Stage 1 Consultation were postponed. The Applicant committed to rearranging them as soon as possible and subsequently proposed an additional stage of non-statutory consultation prior to the Stage 2 Statutory Consultation (the Stage 1b Consultation – see below). The consultation remained live, and consultees were directed to the project website, email address or community contact point should they have any queries about the consultation or the Proposed Development.
- Stage 1b Consultation (18 September to 29 October 2020): This comprised the second non-statutory stage of consultation on the emerging plans for the Proposed Development. The consultation provided a further opportunity for consultees to influence the proposals to be presented at the Stage 2 Statutory Consultation. The consultation included some updates on the proposals resulting from feedback received at the Stage 1 Consultation and the further development and refinement of the proposals. This included an update on the selection of a preferred corridor for the Grid Connection.

Stage 2 Statutory Consultation (28 June to 13 August 2021): This comprised the Applicant's statutory consultation on the proposed application in accordance with the requirements of Sections 42, 47 and 48 of the Planning Act 2008.

Section 47 consultation took place in February and March 2021 for a period of 29 days. Section 48 notices were placed in newspapers in June 2021, with Section 42 consultation also taking place in June 2021.

The Exec. Table 1.1 below provides a summary timeline of the key stages within the overall consultation process:

Executive Summary Table 1.1

Date	Action	Requirement
3 December 2019	Submission of Scoping Report to SoS	EIA
13 January 2020	Scoping Opinion	EIA
16 March to 4 May 2020	Stage 1 Consultation (non-statutory)	-
18 September to 29 October 2020	Stage 1B Consultation (non-statutory)	-
26 February 2021	Consultation on Draft SoCC with Host Authorities	S47
26 March - 7 April 2021	Response from Host Authorities to draft SoCC	S47
14 June 2021	Notification of the Applicant of the intent to submit a DCO	S46
14 to 18 June 2021	Notice of the SoCC in newspapers	S47
14 - 25 June 2021	Notices published in local newspapers	S48



Date	Action	Requirement
21 June 2021	Notices published in National newspaper and London Gazette	S48
23 June 2021	Letters sent to relevant consultees	S42 and S44
24 June 2021	SoCC published online for public inspection	S50
28 June 2021 – 13 August 2021	Stage 2 Statutory Consultation	S42, S47 and S48
5 July 2021	Consultation Invitation Flyer sent to consultees	
8 July 2021	SoS notification (s46) - notification by the Applicant	S46
13 August 2021 11:55 pm	Deadline for Stage 2 Statutory Consultation responses	S42, S47 and S48

A total of 706 pieces of feedback were received in response to the Stage 2 Statutory Consultation. Representations were received from local authorities, national and regional organisations, persons with an interest in land and the local community.

MVV thank all those parties who have engaged in their pre-application consultation.



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1. Introduction

- 1.1.1 Medworth CHP Limited (the Applicant) is applying to the Secretary of State (SoS) for a Development Consent Order (DCO) to construct operate and maintain an Energy from Waste (EfW) Combined Heat and Power (CHP) Facility on the industrial estate, Algores Way, Wisbech, Cambridgeshire. Together with associated Grid Connection, CHP Connection, Access Improvements, Water Connections, and Temporary Construction Compound (TCC), these works are the Proposed Development.
- 1.1.2 The Proposed Development would recover useful energy in the form of electricity and steam from over half a million tonnes of non-recyclable (residual), non-hazardous municipal, commercial and industrial waste each year. The Proposed Development has a generating capacity of over 50 megawatts and the electricity would be exported to the grid. The Proposed Development would also have the capability to export steam and electricity to users on the surrounding industrial estate. Further information is provided in **Chapter 3: Description of the Proposed Development (Volume 6.2)**.
- 1.1.3 The Proposed Development is a Nationally Significant Infrastructure Project (NSIP) under Part 3 Section 14 of the Planning Act 2008 (2008 Act) by virtue of the fact that the generating station is located in England and has a generating capacity of over 50 megawatts (section 15(2) of the 2008 Act). It, therefore, requires an application for a DCO to be submitted to the Planning Inspectorate (PINS) under the 2008 Act. PINS will examine the application for the Proposed Development and make a recommendation to the SoS for Business, Energy and Industrial Strategy (BEIS) to grant or refuse consent. On receipt of the report and recommendation from PINS, the SoS will then make the final decision on whether to grant the Medworth EfW CHP Facility DCO.
- 1.1.4 This document constitutes the Consultation Report produced pursuant to Section 37(3)(c) of the Planning Act 2008 which requires that an application for a DCO must be accompanied by a Consultation Report.
- 1.1.5 This Report describes and provides evidence of how the Applicant has complied with the provisions of the Planning Act 2008, the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 (APFP Regulations) and the Infrastructure Planning (Environmental Impact Assessment) (EIA) Regulations 2017 (the EIA Regulations) as they relate to pre-application consultation. Section 37(7) of the Planning Act 2008 defines the Consultation Report as a document giving details of:
- *“a. what has been undertaken in compliance with Sections 42, 47 and 48 in relation to a proposed application that has become the application;*
 - *b. any relevant responses; and*
 - *c. the account taken of any relevant responses.”*



1.1.6 In accordance with Section 50(3) of the Planning Act 2008, the Applicant has had regard to the Department for Communities and Local Government (DCLG) guidance on the pre-application process (March 2015) (the DCLG Guidance).

1.1.7 In addition, in preparing this Consultation Report, attention has been given to the Planning Inspectorate's Advice Notes, including:

- Advice Note 14: Compiling the Consultation Report (February 2021);
- Advice Note Two: The role of local authorities in the development consent process (February 2015);
- Advice Note Three: EIA consultation and notification (August 2017); and
- Advice Note 11: Working with public bodies in the infrastructure planning process (November 2017).

1.2 The Applicant

1.2.1 The Applicant is a wholly owned subsidiary of MVV Environment Limited (MVV). MVV is part of the MVV Energie AG group of companies. MVV Energie AG is one of Germany's leading energy companies, employing approx. 6,500 people with assets of around €5 billion and annual sales of around €4.1 billion. The Proposed Development represents an investment of approximately £450m.

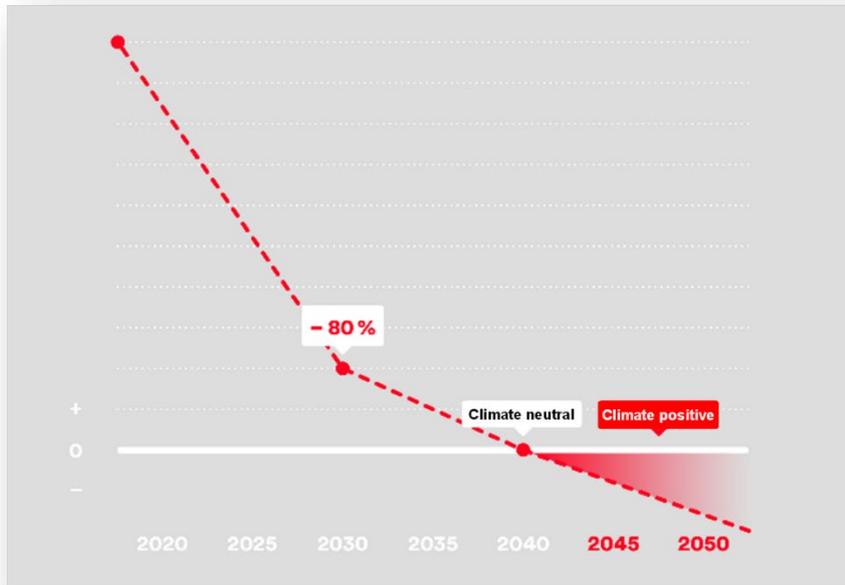
1.2.2 The company has over 50-years' experience in constructing, operating, and maintaining EfW CHP facilities in Germany and the UK. MVV Energie's portfolio includes a 700,000 tonnes per annum residual EfW CHP facility in Mannheim, Germany.

1.2.3 MVV Energie has a growth strategy to be carbon neutral by 2040 and thereafter carbon negative, i.e., climate positive, as presented in **Figure 1.1 MVV Energie climate growth strategy targets**. Specifically, MVV Energie intends to:

- Reduce its direct CO₂ emissions (Scope 1) by over 80% by 2030 compared to 2018;
- Reduce its indirect CO₂ emissions (Scope 2 and 3) by 82% before 2030 compared to 2018;
- Be climate neutral by 2040, and
- Be climate positive from 2040.



Figure 1.1 MVV Energie climate growth strategy targets



- 1.2.4 MVV's UK business retains the overall group ethos of 'belonging' to the communities it serves whilst benefitting from over 50-years' experience gained by its German sister companies.
- 1.2.5 MVV's largest project in the UK is the Devonport EfW CHP Facility in Plymouth. Since 2015, this modern and efficient facility has been using around 265,000 tonnes of municipal, commercial and industrial residual waste per year to generate electricity and heat, notably for Her Majesty's Naval Base Devonport in Plymouth, and exporting electricity to the grid.
- 1.2.6 In Dundee, MVV has taken over the existing Baldovie EfW Facility and has developed a new, modern facility alongside the existing facility. Operating from 2022 of municipal, commercial and industrial waste each year as fuel for the generation of usable energy.
- 1.2.7 Biomass is another key focus of MVV's activities in the UK market. The biomass power plant at Ridham Dock, Kent, uses up to 195,000 tonnes of waste and non-recyclable wood per year to generate green electricity and is capable of exporting heat.
- 1.2.8 The Applicant sees pre-application consultation as not just a key requirement of the Planning Act 2008 but as a crucial means of raising awareness and understanding about the Proposed Development. The Applicant recognises the positive contribution of consultation feedback and has had regard to the feedback received and used this to help shape the planning, assessment, and design process for the Proposed Development.



1.3 The Proposed Development

1.3.1 The Proposed Development is located in the town of Wisbech within the administrative areas of Cambridgeshire County Council (CCC) and Fenland District Council (FDC). A map of these areas in relation to the Proposed Development is provided in **Appendix HH**. To facilitate connection of the EfW CHP Facility to the electricity network a new 132kV Grid Connection extends from the site into the administrative areas of Norfolk County Council (NCC) and the Borough Council of King's Lynn and West Norfolk (KLWN).

1.3.2 If granted, the DCO would contain the required permissions for the construction and operation of the Proposed Development which consists of the following elements:

- The EfW CHP Facility;
- CHP Connection;
- Temporary Construction Compound (TCC);
- Access Improvements;
- Water Connections; and
- Grid Connection.

1.3.3 A summary description of each Proposed Development element is provided below. A more detailed description is provided in ES **Chapter 3: Description of the Proposed Development (Volume 6.2)** of the ES. A list of terms and abbreviations can be found in **Chapter 1 Introduction, Appendix 1F Terms and Abbreviations (Volume 6.4)**.

- **EfW CHP Facility Site:** A site of approximately 5.3ha located south-west of Wisbech, located within the administrative areas of FDC and CCC. The main buildings of the EfW CHP Facility would be located in the area to the north of the Hundred of Wisbech Internal Drainage Board (HWIDB) drain bisecting the site and would house many development elements including the tipping hall, waste bunkers, boiler house, turbine hall, air cooled condenser, air pollution control building, chimneys and administration building. The gatehouse, weighbridges, 132kV switching compound and laydown maintenance area would be located in the southern section of the EfW CHP Facility Site.
- **CHP Connection:** The EfW CHP Facility would be designed to allow the export of steam and electricity from the facility to surrounding business users via dedicated pipelines and private wire cables located along the disused March to Wisbech railway. The pipeline and cables would be located on a raised, steel structure.
- **TCC:** Located adjacent to the EfW CHP Facility Site, the compound would be used to support the construction of the Proposed Development. The compound would be in place for the duration of construction.



- **Access Improvements:** includes access improvements on New Bridge Lane (road widening and site access) and Algores Way (relocation of site access 20m to the south).
- **Water Connections:** A new water main connecting the EfW CHP Facility into the local network will run underground from the EfW CHP Facility Site along New Bridge Lane before crossing underneath the A47 (open cut trenching or horizontal directional drilling (HDD)) to join an existing Anglian Water main. An additional foul sewer connection is required to an existing pumping station operated by Anglian Water located to the northeast of the Algores Way site entrance and into the EfW CHP Facility Site.

1.3.4 **Grid Connection:** This comprises a 132kV electrical connection using underground cables. The Grid Connection route begins at the 132kV switching compound in the EfW CHP Facility Site and runs underneath New Bridge Lane, before heading north within the verge of the A47 to the Walsoken Substation on Broadend Road. From this point the cable would be connected underground to the Walsoken DNO Substation.

1.4 Structure of the report

1.4.1 The Applicant has undertaken three main stages of pre-application consultation. This comprised two stages of non-statutory consultation, followed by a statutory consultation on the Applicant's proposed application. Outside of these consultation stages, ongoing engagement activities also took place and contributed to the evolution of the Proposed Development.

1.4.2 This Report sets out what happened during the statutory and non-statutory stages of pre-application consultation. It seeks to "tell the story" of how the Proposed Development evolved through the consultation stages, and documents how feedback from consultees has influenced the options and choices that led to changes to the Proposed Development. It also sets out how the Applicant complied with the relevant requirements of the Planning Act 2008 and associated guidance.

1.4.3 An overview of the structure of this Report is provided in set out in **Table 1.1 Structure of the Report** below.

Table 1.1 Structure of the Report

Chapter	Title	Overview
Chapter 1	Introduction	Sets out the Purpose of the Report, provides details of the Applicant and the Proposed Development and explains the structure of the Report.
Chapter 2	Legislative Context	Sets out the requirements for statutory pre-application consultation under the Planning Act 2008 and provides evidence of how the Applicant has complied with the relevant requirements.



Chapter	Title	Overview
Chapter 3	Overview of Consultation	Sets out a summary of the Applicant's general approach to pre-application consultation and engagement and a timeline illustrating the main stages of consultation and ongoing engagement.
Chapter 4	Approach to Non-Statutory Consultation (Stage 1 and 1b Consultations)	<p>Provides details of the approach to non-statutory 'informal' consultations conducted prior to the formal statutory consultation and publicity stages under the Planning Act 2008.</p> <p>The chapter summarises the feedback received to the informal consultations and sets out how the Applicant has had regard to this feedback. The Stage 1 and 1b Consultation Feedback Reports are provided at Appendices B and C, respectively.</p>
Chapter 5	Approach to Statutory Consultation	<p>Provides details of the approach to the pre-application statutory consultation including what has been done to satisfy the requirements of:</p> <ul style="list-style-type: none"> • Section 42 of the Planning Act 2008; • Section 46 of the Planning Act 2008; • Section 47 of the Planning Act 2008, including the development of a Statement of Community Consultation; and • Section 48 of the Planning Act 2008.
Chapter 6	Consultation under the EIA Regulations	Provides a summary of the approach to scoping and production of the Preliminary Environmental Information Report (PEIR) and the Environmental Statement (ES).
Chapters 7 to 18	Regard to feedback to the Statutory Consultation under Section 49 of the 2008 Act	<p>Explains the Applicant's approach to receiving, processing and having regard to feedback in terms of the methods and processes used.</p> <p>Summarises the feedback received from consultees grouped by topic as part of the Stage 2 Statutory Consultation and explains by topic the regard that has been given to feedback in finalising the Proposed Development for the DCO application.</p>
Chapter 19	Conclusions and Next Steps	Sets out conclusions on the consultation process followed by an explanation of the process in the future in terms of consultation via the Planning Inspectorate.



2. Legislative context

2.1.1 Sections 42 to 50 of the Planning Act 2008 (Part 5, Chapter 2) set out requirements for statutory pre-application consultation in relation to a proposed application for a DCO.

2.1.2 The following sections summarise these requirements, with evidence of how the Applicant has complied with them detailed in Chapter 5 of this Report.

2.2 Duty to consult under Section 42 and Section 45

2.2.1 Section 42 of the Planning Act 2008 requires the following parties to be consulted about the proposed application:

- Such persons as may be prescribed;
- The Marine Management Organisation. As the Proposed Development does not affect any of the areas specified in s42(2) it was not necessary to consult the Marine Management Organisation);
- Each Local Authority that is within Section 43 of the Planning Act 2008;
- The Greater London Authority if the land is in Greater London. As the Proposed Development does not affect land in Greater London, it was not necessary to consult the Greater London Authority; and
- Each person who is within one or more categories set out in Section 44 of the Planning Act 2008.

2.2.2 For the purposes of Section 42(1)(a) of the Planning Act 2008, the persons prescribed are those listed in column 1 of the table in Schedule 1 to the APFP Regulations in the circumstances where columns 2 and 3 apply.

2.2.3 With regard to Section 42(1)(b), local authorities include each Local Authority in whose area the Proposed Development is located (Section 43(1)). It also includes those local authorities that share a boundary with that authority (Section 43(2)).

2.2.4 For the purposes of Section 42(1)(d), a person is within Section 44 of the Planning Act 2008 if the applicant, after making diligent enquiry, knows that the person is an owner, lessee, tenant (whatever the tenancy period) or occupier of the land (Category 1, Section 44(1)); is interested in the land or has power to sell and convey the land or to release the land (Category 2, Section 44(2)); or if the applicant thinks that a person would or might be entitled to make a relevant claim if the order sought by the proposed application were to be made and fully implemented (Category 3, Section 44(4)).

2.2.5 There is a requirement, when consulting a person under Section 42(1), to notify them of the deadline for receipt of comments to the consultation (Section 45(1)). This must be a minimum of 28 days, commencing on the day after the day on which the person receives the consultation documents (Section 45(2)). Consultation



documents are the documents supplied to the person by the applicant for the purposes of the consultation (Section 45(3)).

2.3 Duty to notify the Secretary of State of proposed application under Section 46

2.3.1 Aligned with formal consultation under Section 42 is a requirement for the applicant to notify the SoS of the proposed application under Section 46.

2.3.2 This must be done on or before commencing consultation under Section 42 (Section 46(2) of the Planning Act 2008) and the SoS must be supplied with the same information as is proposed to be used for Section 42 consultation (Section 46(1)).

2.4 Duty to consult local community under Section 47

2.4.1 Section 47(1) of the Planning Act 2008 requires the applicant to prepare a Statement of Community Consultation (SoCC). The SoCC should set out how the applicant proposes to consult the people living in the vicinity of the land about the proposed application. There is a duty on the applicant to consult the relevant local authorities (local authorities within Section 43(1)) in respect of the content of the SoCC (Section 47(2)). In line with paragraph 38 of the DCLG guidance, this consultation should be focussed on obtaining information about the make-up of the area, whether there are any groups identified as difficult to reach, the techniques that might be appropriate to overcome barriers to communication and the appropriateness of the proposed approach to consultation.

2.4.2 Local Authority responses to consultation on the content of the SoCC should be requested within a 28-day period (commencing on the day after the day on which the Local Authority receives the consultation documents for the purposes of consulting on the content of the SoCC). Section 47(5) of the Planning Act 2008 requires the applicant to have regard to any response provided by the Local Authority received within the deadline given for a response when preparing the SoCC.

2.4.3 In developing the SoCC, regard must be had to the EIA Regulations and relevant guidance about pre-application procedure. Regulation 12 of the EIA Regulations stipulates that the SoCC must set out whether the proposal is EIA development and, if so, how the applicant intends to publicise and consult on preliminary environmental information.

2.4.4 Once prepared, the SoCC must be made available for inspection by the public in a way that is reasonably convenient for people living in the vicinity of the land (Section 47(6) (za)). A notice must also be published in a newspaper circulating in the vicinity of the land (stating where and when the statement can be inspected), and in such other manner as may be prescribed (Sections 47(6)(a) and (b)).

2.4.5 Consultation must be carried out in accordance with the proposals set out in the SoCC (Section 47(7)).



2.5 Duty to publicise the proposed application under Section 48

2.5.1 Section 48(1) of the Planning Act 2008 requires the applicant to publicise the proposed application at the pre-application stage. Regulation 4 of the APFP Regulations prescribes the manner in which this publicity must be undertaken. Regulation 4(2) sets out the requirement for the applicant to publish a notice within local and national publications, and Regulation 4(3) provides detail of the matters which must be included in that notice.

2.5.2 In developing and publishing the notice, regard must be had to the EIA Regulations and relevant guidance about pre-application procedure. Regulation 13 of the EIA Regulations stipulates that, where the application for development consent is an application for EIA development, the applicant must at the same time as publishing the notice of the proposed application under Section 48(1), send a copy of the notice to the consultation bodies and to any person notified to the applicant by PINS in accordance with Regulation 11(1)(c) of the EIA Regulations.

2.6 Duty to have regard to responses under Section 49

2.6.1 Section 49 of the Planning Act 2008 requires the applicant to have regard to the responses to consultation and publicity when deciding whether to make the application on the same terms as the proposed application consulted upon. **Chapter 4** of this Consultation Report provides an overview of the responses received to the non-statutory consultation, how the applicant has had regard to them, and how they influenced the development of the Proposed Development. **Chapters 7 to 18** provide an overview of the responses received to the Stage 2 Statutory Consultation, how the Applicant has had regard to this feedback, and how they influenced the development of the Proposed Development.

2.7 Duty to have regard to guidance under Section 50

2.7.1 Section 50 of the Planning Act 2008 requires the applicant to have regard to guidance about the pre-application procedure issued by the SoS. The DCLG Guidance sets out the necessary requirements and procedures and gives clarity on the scope and scale of the consultation required at the pre-application stage. It covers all of the main pre-application consultation processes required by the applicant prior to the submission of the DCO application.

2.7.2 **Table 2.1 Evidence of activities required** outlines the activities the applicant is required to undertake during the pre-application stage, and signposts to where the evidence is provided in this Report and its appendices where applicable.

Table 2.1 Evidence of activities required

Activity required under Section 50	Evidence
Notify the Secretary of State of the proposed application	A copy of the s46 Notification by the Applicant to the SoS is provided in Appendix G of this Report.



Activity required under Section 50	Evidence
Identify whether the project requires an environmental impact assessment	Appendix A of this report provides a copy of the Regulation 8(1)(b) Notification of ES letter sent from the Applicant to the Planning Inspectorate stating the intention to provide an ES in respect of the development. A copy of the EIA Scoping Report is also included in Appendix A of this Report.
Produce a SoCC	A copy of the SoCC has been included in Appendix M of this Report.
Make the SoCC available for inspection by the public	The SoCC was published online for public inspection on the 24 June 2021. A screenshot of the project website displaying the Statement of Community Consultation is included in Appendix P .
Identify and consult statutory consultees as required by Section 42 of the Planning Act and Regulations	Statutory and Prescribed Consultees identified and consulted in the Stage 2 Statutory Consultation are listed within Appendix R of this Report.
Publicise the proposed application in accordance with Regulations	Copies of the Section 48 notices placed in local newspapers circulating in the vicinity of the Proposed Development, a national newspaper, and the London Gazette are included in Appendix I .
Set a deadline for consultation responses of not less than 28 days from the day after receipt/last publication	As outlined in Table 5.6, the last publication of the Section 48 notice was on the 25 June 2021. The deadline for responses to the Stage 2 Statutory Consultation was on the 13 August 2021, 50 days after the last publication of the Section 48 notice.
Have regard to relevant responses to publicity and consultation	Chapter 4 sets out how the Applicant has had regard to responses received to the Stage 1 and Stage 1b Consultation. The Stage 1 and 1b Consultation Feedback Reports are provided at Appendices B and C , respectively. Chapters 8 to 19 set out how the Applicant has had regard to this feedback from the Stage 2 Statutory Consultation.
Prepare a Consultation Report and submit it to the Secretary of State	This document is the Consultation Report, which will be submitted to the SoS.

2.8 Requirement for a Consultation Report under Section 37

2.8.1 The requirement for a Consultation Report is set out in Section 37(3)(c) of the Planning Act 2008. Section 37(7) of the 2008 Act defines the Consultation Report as a document giving details of:

- What has been done in compliance with Sections 42, 47 and 48 of the 2008 Act in relation to a proposed application that has become the application;



- Any relevant responses received to formal consultation undertaken; and
- The account taken by the Applicant of any relevant responses.

2.9 Statement of Compliance

2.9.1 **Table 2.2 Compliance with legislation and guidance** below outlines a chronology of statutory and non-statutory consultation activities relating to the Proposed Development and highlights how the Applicant has complied with the legislative requirements of the Planning Act 2008, subordinate legislation and the DCLG Guidance, as outlined in this section. It provides a signpost to where the evidence is provided in this Report and its appendices where applicable.

Table 2.2 Compliance with legislation and guidance

Key/Statutory consultation event	Date	Further information
EIA Scoping Report	3 December 2019	Appendix A
EIA Scoping Opinion	13 January 2020	Environmental Statement Chapter 1, Appendix 1D
Stage 1 Consultation (non-statutory)	16 March to 4 May 2020	Chapter 4 Stage 1 Consultation Feedback Report (Appendix B)
Stage Consultation 1B (non-statutory)	18 September to 29 October 2020	Chapter 4 Stage 1b Consultation Feedback Report (Appendix C)
Stage 2 Statutory Consultation	(28 June 2021 – 13 August 2021)	Chapters 7 to 18
Draft SoCC cover letter	26 February 2021	Appendix D
Response from relevant Council(s) to draft SoCC	Received between 26 March and 7 April 2021	Section 5.5.13 presents a summary of the feedback received. Appendix E presents a schedule of the responses received, the Applicant's response and whether it resulted in a change to the draft SoCC.
Notice of the SoCC in newspapers	14 to 18 June 2021	Table 5.5 and Appendix F
SoS notification (s46) - notification by the Applicant	8 July 2021	Appendix G



Key/Statutory consultation event	Date	Further information
Consultation Invitation Flyer	Issued commencing 2021	week 5 July Appendix N
s42/s44 - sample letter	23 June 2021	Appendix H
s48 Notices (local newspapers)	14 to 25 June 2021	Table 5.6 and Appendix I
s48 Notice (National newspaper)	21 June 2021	Appendix I
s48 Notice (London Gazette)	21 June 2021	Appendix I



3. Overview of Consultation

3.1 Introduction

3.1.1 This chapter of the Report has been prepared having regard to the advice contained in the 'introductory text' section of the Planning Inspectorate's Advice Note 14 (2021) and provides an overview of the consultation process undertaken by the Applicant in respect of the Proposed Development.

3.2 Approach to Consultation

3.2.1 The Applicant sees pre-application consultation as not just a key requirement of the Planning Act 2008 but as a means of raising awareness and understanding about the Proposed Development, as well as receiving feedback on the proposals. It also helps to develop a two-way dialogue with local communities and consultees to understand the issues that are important to them.

3.2.2 In developing the approach to consultation for the Proposed Development, the Applicant has given careful consideration to the specific requirements set out in the following legislation:

- The Planning Act 2008;
- The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations); and
- The Infrastructure Planning (Applications, Prescribed Forms and Procedures) Regulations 2009 (the APFP Regulations).

3.2.3 Given the scale and complexity of the Proposed Development, and taking into account best practice and the DCLG Guidance, the Applicant has undertaken a multi-stage pre-application consultation process to ensure that consultees had the opportunity to provide feedback at appropriate points in the development of the Proposed Development. The stages of consultation undertaken were:

- Stage 1 Consultation (16 March to 4 May 2020): This comprised the first non-statutory stage of consultation on the emerging proposals for the Proposed Development. The consultation was undertaken at an early stage in the project development process, to provide consultees with an opportunity to influence the proposals.
- Due to the COVID-19 pandemic and the associated social restrictions, the public exhibitions proposed as part of the Stage 1 Consultation were postponed. The Applicant committed to rearranging them as soon as possible and subsequently proposed an additional stage of non-statutory consultation prior to the Stage 2 Statutory Consultation (the Stage 1b Consultation – see below). The consultation remained live, and consultees were directed to the project website, email address or community contact point should they have any queries about the consultation or the Proposed Development.



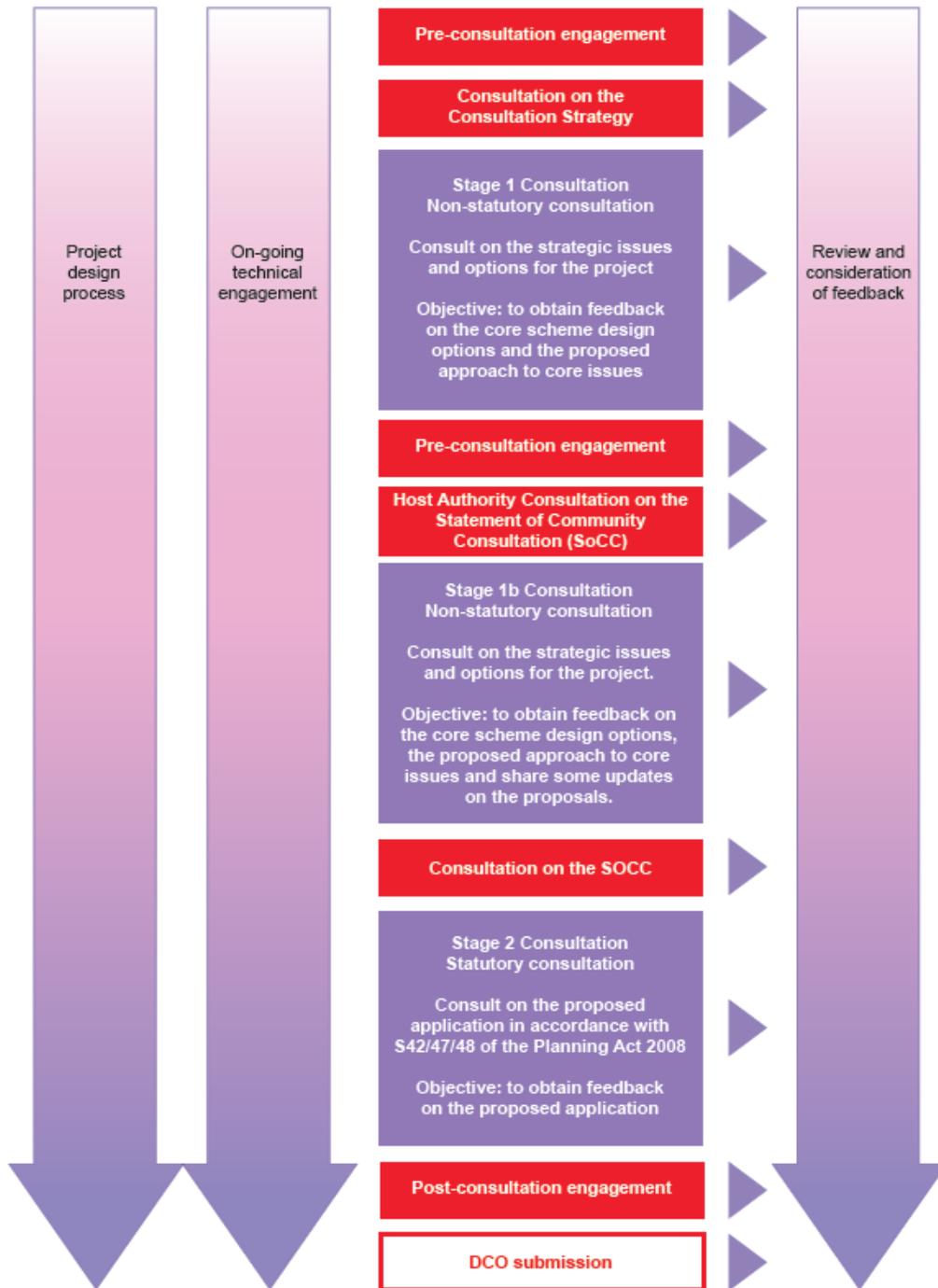
- Stage 1b Consultation (18 September to 29 October 2020): This comprised the second non-statutory stage of consultation on the emerging plans for the Proposed Development. The consultation provided a further opportunity for consultees to influence the proposals to be presented at the Stage 2 Statutory Consultation. The consultation included some updates on the proposals resulting from feedback received at the Stage 1 Consultation and the further development and refinement of the proposals. This included an update on the selection of a preferred corridor for the Grid Connection.
- Stage 2 Statutory Consultation (28 June to 13 August 2021): This comprised the Applicant's statutory consultation on the proposed application in accordance with the requirements of Sections 42, 47 and 48 of the Planning Act 2008.

3.2.4 The multi-stage, iterative approach outlined above complies with paragraph 70 of the DCLG Guidance which refers to the need to manage the tension between consulting early and having proposals that are firm enough to enable consultees to comment. The approach has allowed the refinement of the Proposed Development at each stage through a design, evaluation and assessment process that takes into account consultee feedback.

3.2.5 The diagram presented at **Figure 3.1 Pre-Application consultation process** sets out the main stages of the pre-application process, including key statutory and non-statutory consultation, engagement, and publicity that the Applicant has carried out on the Proposed Development.



Figure 3.1 Pre-Application consultation process





4. Approach to Non-Statutory Consultation

4.1 Introduction

4.1.1 This Chapter sets out details of the non-statutory "informal" consultation that the Applicant undertook prior to formal consultation activities as prescribed by the Planning Act 2008. Two main stages of non-statutory consultation were undertaken:

- Stage 1 Consultation; and
- Stage 1b Consultation.

4.1.2 This Chapter summarises the purpose of these informal stages of consultation and the methods and activities that were used to undertake the consultations. Details of the regard given to responses received from these consultations, and how they influenced the development of the Proposed Development, is also summarised. Separate Consultation Feedback Reports in respect of the non-statutory stages of consultation were provided at the Stage 1b Consultation in September 2020 and at the Applicant's Stage 2 Statutory Consultation in June 2021. The Consultation Feedback Reports provide a full account of the responses received and sets out how the Applicant has had regard to them. Copies of these documents are presented at **Appendices B and C** and are referred to throughout this chapter.

4.1.3 Non-statutory engagement with consultees including the local authorities, statutory consultees/prescribed consultees and other relevant Stakeholders also continued between, and following, the non-statutory consultations. The Preliminary Environmental Information Report Chapters consulted on at Stage 2 Consultation included overviews of the engagement which took place, summarising the Stakeholders consulted and the issues discussed.

4.2 Stage 1 Consultation

4.2.1 In December 2019, the Applicant presented its strategy for pre-application consultation to the host local authorities¹. The Consultation Strategy (provided in **Appendix J**) set out plans for the following two stages of pre-application consultation with respect to the emerging proposals:

- Stage 1 – Non-Statutory Consultation; and
- Stage 2 – Statutory Consultation in accordance with the requirements of the Planning Act 2008.

4.2.2 The Applicant engaged with the four host local authorities on the content of the Strategy and its approach to the consultation. Feedback was received from all host local authorities and was considered by the Applicant as part of finalising the

¹ Borough Council of Kings Lynn and West Norfolk, Cambridgeshire County Council, Fenland District Council and Norfolk County Council.



approach to the consultation. Details of the comments received from the host local authorities on the Consultation Strategy, and the Applicant's response are set out in Appendix A of the Stage 1 Consultation Feedback Report (CFR) provided in **Appendix B**.

Purpose of the consultation (Stage 1)

4.2.3 The Stage 1 Consultation was a non-statutory consultation undertaken at an early stage in the project development process to provide consultees with an opportunity to influence the proposals.

4.2.4 It was focussed on the strategic issues and options for the Proposed Development, with views sought on the core scheme; design options; and any emerging preferences for the Proposed Development and its delivery.

When did the consultation take place?

4.2.5 The Stage 1 Consultation took place for a period of seven weeks between 16 March and 4 May 2020.

4.2.6 Due to the COVID-19 pandemic and the associated government guidance on social distancing and gatherings, changes had to be made to the consultation approaches following its launch. Further information on this and the actions taken are detailed in **Section 4.2.22** below.

Consultation zone

4.2.7 The Stage 1 Consultation was undertaken within an identified consultation zone around the area of the Proposed Development but was not restricted to respondents located in this area.

4.2.8 A Consultation Zone with two distinct areas was defined with the objective of seeking the views of local communities and other parties interested in the Applicant's proposals. These areas are described below and illustrated in Appendix B of the Stage 1 CFR in **Appendix B**:

- Zone A – covered a two-kilometre radius of the Main Development Site² boundary, plus the full extent of residential areas in Wisbech and Elm.
- Zone B – represented a five-kilometre radius of the Main Development Site boundary. It also included a two-kilometre buffer around the potential Grid Connection options.

² At Stage 1, the Main Development Site was defined as the EfW CHP Facility Site.



Who was consulted?

Prescribed consultees

4.2.9 Although the Stage 1 Consultation was non-statutory, the relevant prescribed statutory consultees listed in Schedule 1 of the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 (the APFP Regulations) were contacted. In addition to the host local authorities, this included statutory bodies such as Natural England, Historic England and the Environment Agency (EA) as well as parish councils.

Local authorities

4.2.10 The local authorities set out in **Table 4.1 Local authorities consulted during the Stage 1 Consultation** were notified of the consultation:

Table 4.1 Local authorities consulted during the Stage 1 Consultation

Section 43 Grouping	Description	Local authorities
A	A neighbouring authority that shares a boundary with a unitary council or lower tier district council within whose area the development is situated.	Breckland Council East Cambridgeshire District Council Huntingdonshire District Council North Norfolk District Council South Holland District Council The Broads Authority West Suffolk Council
B	Either a unitary council or lower tier district council in which the development is situated (a host authority).	Borough Council of King's Lynn and West Norfolk Fenland District Council
C	An upper tier county council in which the development is situated (a host authority).	Cambridgeshire County Council Norfolk County Council
D	A Local Authority which is not a lower tier district council and shares a boundary with a 'C' authority.	Bedford Borough Council Central Bedfordshire Council Essex County Council Hertfordshire County Council Lincolnshire County Council Northamptonshire County Council Peterborough City Council Suffolk County Council

Local communities

4.2.11 Local community consultees were defined as:

- Individuals, owners/occupiers, businesses and groups based or living in the vicinity of the Proposed Development;



- Individuals who are users of the area or visitors to it (e.g., workers);
- Voluntary organisations (including residents' associations);
- Faith communities;
- Traveller communities;
- Schools and colleges in the vicinity of the Proposed Development; and
- Local hospitals, care homes and private healthcare organisations in the vicinity of the Proposed Development.

Wider consultees

4.2.12 In addition to prescribed consultees and the local community, the Applicant consulted a number of other local bodies and individuals not identified in Schedule 1 of the APFP Regulations 2009. These included:

- Local bodies and technical consultees such as local Wildlife Trusts, the Bramley Line Heritage Trust, and the National Trust; and
- County and Ward Councillors and MPs in relevant areas.

4.2.13 A list of those consulted is presented in Appendix C of the Stage 1 CFR at **Appendix B**.

Consultation method

4.2.14 In accordance with the DCLG Guidance on pre-application consultation, a range of methods and techniques were used to ensure that consultees identified above and all sections of the community that could be affected by the Proposed Development could be involved in the consultation process.

Website

4.2.15 A dedicated project website (<https://www.mvv-medworthchp.co.uk/>) was launched in December 2019. At the start of the Stage 1 Consultation, the project website was updated to provide information on the consultation. It contained the consultation materials, a frequently asked questions section, details of the public exhibition events and Document Inspection Locations, latest news and updates, an electronic feedback form, contact information and details of how to respond to the consultation.

4.2.16 Following the close of the consultation, a library of documents remained available, but the webpage was updated to make clear that the consultation had closed. The electronic feedback form was removed but the general enquiries form remained active.

Project email address

4.2.17 A dedicated project email address (medworth@mvvuk.co.uk) was set up in November 2019. During the Stage 1 Consultation period, 13 enquiries were received through this channel; prior to and following the consultation period 22 other



enquiries were received and all such enquiries were individually responded to by the Applicant.

Community Contact Point

- 4.2.18 At the start of the consultation a community contact point (local rate telephone number) was launched with an answer phone and call-back service to ensure callers were able to leave a message in the event that staff were out of the office.
- 4.2.19 The community contact point was available for consultees to discuss the Proposed Development, leave a message or request hard copies of project documents. During the consultation the Applicant received four calls to the phonenumber, which sought clarity on aspects of the Proposed Development or the approach to public exhibitions.

Freepost address

- 4.2.20 A Freepost address (Freepost MVV) was created to ensure those without internet access could request, complete, and return hard copies of the feedback form. 13 hard copy responses were received through the Freepost address.

Exhibitions

- 4.2.21 In total seven public exhibitions were proposed during the consultation at the venues set out in **Table 4.2 Exhibition venues** within the Consultation Zone.

Table 4.2 Exhibition venues

Date	Timings	Exhibition Venue
30 March 2020	2pm-8pm	Marshland Hall (Marshland St. James) , Marshland Hall, Smeeth Rd, Wisbech PE14 8JB
1 April 2020	2pm-8pm	Oasis Community Centre , St Michael's Ave, Wisbech PE13 3NR
4 April 2020	10 am-5pm	Thomas Clarkson Academy , Corporation Road, Wisbech, PE13 2SE
21 April 2020	2pm-8pm	Queen Mary Centre , Queens Road, Wisbech, PE13 2PE
22 April 2020	2pm-8pm	Walton Highway Village Club , Lynn Road, Walton Highway, Wisbech PE14 7DF
23 April 2020	2pm-8pm	Tower Hall , Maltmas Drove, Friday Bridge, Wisbech, PE14 0HW
24 April 2020	2pm-8pm	Wisbech St Mary Sports & Community Centre , Beechings Close, Wisbech St Mary, Wisbech, PE13 4SS

- 4.2.22 On the 23 March 2020, due to the COVID-19 pandemic, the UK was put into 'lockdown' and the above venues were closed. As a result, the exhibitions had to be



postponed. Notice of this postponement was published on the project website and posters were delivered to each of the above venues with a request for them to be placed in a visible location. Posters were also distributed to Wisbech Post Office, Tesco and Morrisons in Wisbech. All identified consultees, who had previously been written to, were notified of the postponement on 19 March 2020 and a press release was issued to raise wider awareness (a copy of the press release is presented in Appendix D of the Stage 1 CFR at **Appendix B**). Copies of publicity and notification materials advertising the postponement of the Stage 1 Consultation events are included in **Appendix GG**.

- 4.2.23 The Applicant committed to rearranging dates and venues for the exhibitions as soon as possible, in line with government recommendations. Consultees were also directed to the project website, email address or community contact point should they have any queries about the consultation or the Proposed Development.

Document Inspection Locations

- 4.2.24 Inspection copies of the consultation documents were made available to view free of charge from the start of the consultation at eight locations within the Consultation Zone. The list of locations is provided in **Table 4.3 Document inspection locations**.

Table 4.3 Document inspection locations

Venue	Address
Wisbech Library	Ely Place, Wisbech, PE13 1EU
Awdry House	110 Ramnoth Road, Wisbech, PE13 2JD
Oasis Community Centre	St Michael's Ave, Wisbech, PE13 3NR
Wisbech St Mary Sports and Community Centre	Beechings Close, Wisbech St Mary, Wisbech, PE13 4SS
Marshland Hall	Marshland Hall, Smeeth Rd, Wisbech PE14 8JB
Rosmini Centre	69a Queens Rd, Wisbech, PE13 2PH
Wisbech Customer Services Centre	Harbour Square, Boathouse Business Centre, Wisbech, PE13 3BH
Walton Highway Village Club	Lynn Road, Walton, Highway, Wisbech, PE14 7DF

- 4.2.25 As stated in **Section 4.2.22**, due to the COVID-19 pandemic, the above venues were closed due to the national 'lockdown'. Posters notifying the postponement of exhibitions were provided to these venues for display where possible. The documents did however remain available for inspection or download on the project website, and paper copies were made available on request via the project email address and contact point phonenumber.



- 4.2.26 A press notice, confirming the revised arrangements, was issued on 9 April 2020 directing consultees to the project website and reiterating that copies of project materials were available to download or in hard copy on request.
- 4.2.27 A 'print at home' low resolution version of the consultation booklet was also uploaded to the project website on 2 April 2020 to assist consultees.

Consultation materials

- 4.2.28 The following information was provided during the consultation electronically via the consultation webpage and in hard copy at the Document Inspection Locations set out in **Table 4.3 Document inspection locations**. Hard copies were also available on request via the community contact point and Freepost address.
- 4.2.29 To ensure accessibility of the information consultation documents were written in plain English and in a style intended to enable people to access information at a non-technical level. These were accompanied by more detailed technical information in the EIA Scoping Report which was clearly signposted within the relevant parts of the overview documents.
- Consultation invitation flyer – Over 10,000 copies were issued to all addresses in Consultation Zone A, prescribed consultees and wider Stakeholders at the start of the consultation. The flyer provided an overview of the consultation, details of the public exhibitions and explained where the project information could be viewed and how feedback could be provided. A copy of the invitation flyer can be found in Appendix E of the Stage 1 CFR provided in **Appendix B** of this Report.
 - Consultation booklet - The consultation booklet summarised the background to the Applicant and the Proposed Development, as well as providing information on the approach to managing the impacts of the proposals. It also explained how to take part in the consultation and where more information could be found. A copy of the Stage 1 Consultation Booklet can be found in **Appendix K** of this Report.
 - Technical information - The EIA Scoping Report was published. This identified the potential likely significant impacts of the Proposed Development that would be considered in depth as part of the EIA and the proposed scope of the assessment in relation to such impacts. A copy of the EIA Scoping Report can be found in **Appendix A** of this Report.
 - Feedback form - A feedback form was provided for anyone wishing to respond to the consultation. The feedback form contained four questions and could be completed online via the project website or in writing by hard copy via the project Freepost address. A copy of the feedback form can be found in Appendix F of the Stage 1 CFR provided in **Appendix B** of this Report.

Advertising and publicity

- 4.2.30 Advertisements, setting out the dates of the consultation and directing people to where they could find out about the exhibitions and other information, were placed



in the following local newspapers circulating across the Consultation Zone during the week commencing 8 March 2020:

- Fenland Citizen; and
- Wisbech Standard.

4.2.31 A copy of a newspaper advertisements is provided in Appendix G of the Stage 1 CFR at **Appendix B** of this Report.

4.2.32 On the 23 March 2020, due to the COVID-19 pandemic, the UK was put into 'lockdown' and the exhibition venues were closed. As a result, the exhibitions had to be postponed. A further advertisement was issued to the above publications during the week commencing 23 March 2020 to make consultees aware that the Applicant had postponed the planned public exhibitions until further notice. A Copy of these newspaper advertisements is also provided in Appendix G of the Stage 1 CFR at **Appendix B** of this Report.

4.2.33 Press releases were also issued to the above publications at the outset of consultation (15 March 2020), following the postponement of the exhibitions (18 March 2020) and to confirm that those interested in the proposals could still provide feedback (9 April 2020).

Hard to reach groups

4.2.34 In addition to the methods outlined in the preceding sections, to ensure that all Stakeholders were able to engage with and respond to the consultation, the Applicant offered a range of solutions for people requiring additional assistance. These included making the consultation documents available in large copy print, audio or Braille on request. A translation service to provide documents in alternative languages was also available on request.

4.2.35 To support requests for hard copy documents and/or alternative document formats, a contact point and Freepost address was provided throughout the period of the consultation. Following the postponement of the consultation events a 'print at home' low resolution version of the consultation booklet was also uploaded to the project website on 2 April 2020; this included an updated final page, showing that the project timeline was under review.

4.2.36 Although postponed, health and safety audits were undertaken of the exhibition venues to strike a suitable balance between accessibility of the buildings and proximity to the residents wishing to attend. All the exhibition locations selected were Disability Discrimination Act (DDA) compliant.

Feedback

4.2.37 The following arrangements were made to facilitate consultation feedback:

- Online feedback through the project website – An electronic feedback form was available on the project website. This could either be completed and submitted online or downloaded from the project website and posted via the Freepost address.



- Email feedback – Email feedback could be submitted via the project email address.
- Hard copy feedback forms – Hard copy feedback forms were prepared for the public exhibitions, made available at all Document Inspection Locations, and were subsequently made available on request via the community contact point.
- Hard copy by post – Hard copy responses could be submitted in writing to the Freepost address at 'Freepost MVV'.

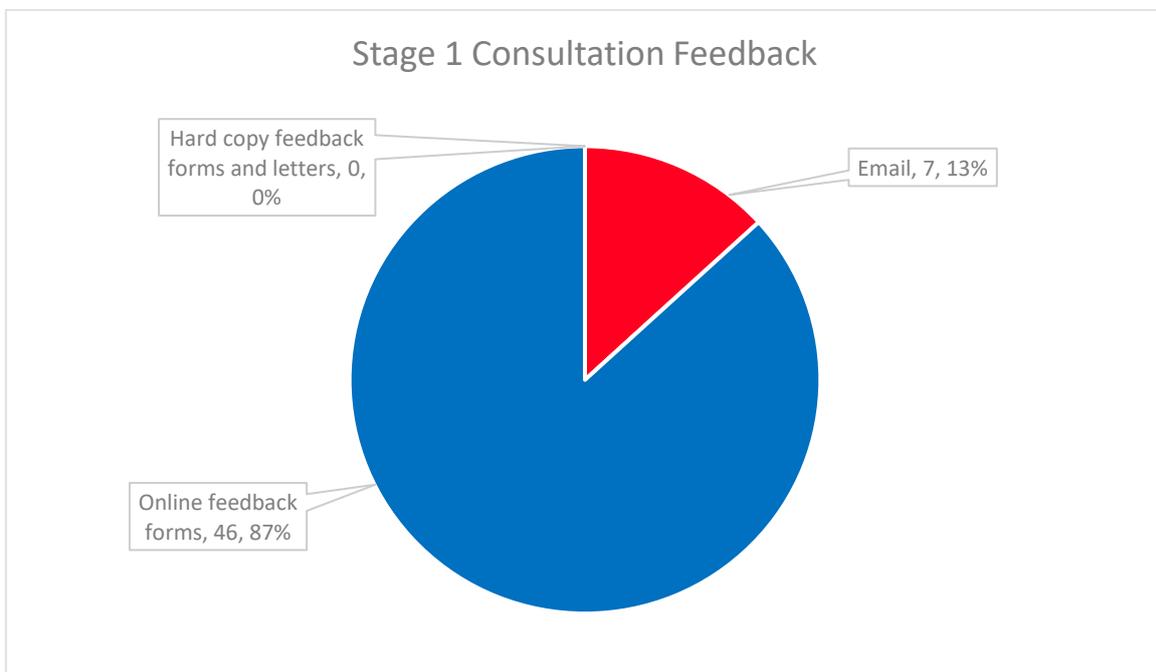
Feedback received

4.2.38 A total of 53 pieces of feedback were received in response to the Stage 1 Consultation.

4.2.39 Representations were received from local authorities, national and regional organisations, and the local community. The feedback received comprised:

- Hard copy feedback forms and letters – 0.
- Email – 7.
- Online feedback forms – 46.

Figure 4.1 Feedback received at Stage 1 Consultation by type



Data processing and analysis

4.2.40 All representations received were logged with a unique identification number before being reviewed and analysed.

4.2.41 A coding framework was created to provide a list of themes and topics raised in the consultation feedback. The coding framework was applied by analysts to all



feedback received. This enabled the capture and organisation of issues raised in a systematic way and assisted in interrogation and analysis of the responses.

4.2.42 Once the coding framework had been applied to the feedback received, similar themes were grouped together and organised into categories. Summaries of the feedback by theme and topic were considered by the project team together with the raw responses received as feedback. This enabled the team to analyse the feedback and take it into account in the design, assessment, and evaluation processes.

4.2.43 All personal data received as part of the consultation was stored and protected in accordance with relevant data protection requirements as set out in the General Data Protection Regulation (GDPR).

4.2.44 A record of the collated feedback received is provided in sections 4 to 7 of the Stage 1 CFR presented at **Appendix B** of this Report with a summary of the key issues arising and the Applicant's regard to the feedback presented below.

Summary of responses to Stage 1 Consultation

4.2.45 The following section summarises the responses received to the Stage 1 Consultation. Responses were grouped thematically under the following headings:

- Design;
- Environment;
- Community; and
- Other Comments

4.2.46 Further detail on the responses received and how the Applicant responded to the matters raised can be found in sections 4 to 7 of the Stage 1 CFR, which is presented at **Appendix B**.

Design

4.2.47 Anglian Water and GTC Pipelines Limited (part of the BUUK Infrastructure Group) were the only prescribed consultees who made comments relating to the general design of the Proposed Development. Both consultees were keen to understand whether the Proposed Development would impact their current networks and operations. Anglian Water requested that its existing infrastructure be considered further as part of the design of the Main Development Site and related Grid Connection Corridor. Requests were also made for further information, particularly around potential risks to the supply of potable and clean water, and any proposed mitigation measures.

4.2.48 A number of members of the public made comments relating to the general design of the Proposed Development, and its potential visual impact. A common concern raised related to the potential visual impact of the EfW CHP Facility and, in particular, the height of the chimney. Consultees considered that options to minimise the effects of the Proposed Development were limited and suggested that the EfW



CHP Facility should be situated in the countryside. Some positive comments were also made about the design of the EfW CHP facility, indicating that no changes were needed in relation to building design, colour, landscaping, or materials.

Environment

- 4.2.49 Anglian Water, Natural England and Royal Mail made comments relating to the environmental assessment methodology, flood risk and traffic impacts of the proposals. Anglian Water said that a foul drainage strategy should form part of the Flood Risk Assessment (FRA) and be developed in consultation with them. Anglian Water also requested the opportunity to comment on the content of the FRA in advance of the DCO application being submitted. It also said that reference should be made in the DCO application and the EIA to both domestic and trade effluent requirements. Natural England said that the DCO application must provide sufficient information demonstrating how the Proposed Development would avoid any adverse impact on the natural environment. Royal Mail raised concerns about the potential effects on the local road network. It specifically requested that the Construction Traffic Management Plan include a mechanism to inform Royal Mail about works affecting the local highway network.
- 4.2.50 Members of the public made comments relating to policy considerations, assessment methodology, air quality and human health, climate change, construction impacts, historic environment, flood risk, noise, safety, traffic impacts and waste storage and disposal. There were also broad objections to the proposals due to the perceived effects on the environment; some specifically stating that the Proposed Development is located in a Zone 3 flood plain.
- 4.2.51 Respondents raised concerns relating to the potential environmental impact of emissions from the chimney of the EfW CHP Facility. A consultee questioned what studies had been undertaken on the pollution spread for smaller particles and heavy metals. Requests were also received to ensure that 'smoke' from the chimney is safe and in line with EA guidelines.
- 4.2.52 Concerns relating to human health and air quality were raised, with responses referencing potential effects of pollution as a result of both the construction (through the increase in traffic movements) and operation (through the removal of ash waste) of the EfW CHP Facility. Comments were also received which raised concerns that Wisbech already has high levels of pollution, and that the proposals would further increase this.
- 4.2.53 A request was made by a member of the public to understand how potential noise effects would be minimised. Other members of the public commented that Wisbech is a Georgian market town with historic architecture and were concerned that the EfW CHP Facility would blemish the town.

Community

- 4.2.54 Cambridgeshire and Peterborough Combined Authority raised concerns about the reintroduction of rail services to Wisbech, stating that if the development compromises the ability to do so, it would object. The Combined Authority also



support the concept of Wisbech as a Garden Town, and expressed objections to the Proposed Development, stating that it could reduce the prospects for achieving Garden Town status.

4.2.55 Members of the public made comments specifically relating to the local economy, jobs, local projects, and social value. One respondent specifically said that they considered there would be no local benefits as a result of the Proposed Development. Concerns were also raised that the number of jobs created was overstated, and it was suggested that the operational jobs available were unlikely to be suitable for local people. Others commented that the Proposed Development responded to the needs of the local community (by creating jobs and employment).

4.2.56 Some respondents raised concerns that the Proposed Development would impact plans to revive the local railway, and that efforts for Wisbech to become a Garden Town would become unachievable if the Proposed Development progresses.

Other

4.2.57 The Marine Management Organisation³ responded to the non-statutory consultation, providing details of its functions relating to licensing and planning in the marine environment. Royal Mail identified that it has an operations facility in close proximity to the Proposed Development and requested further consultation and communication.

4.2.58 Members of the public commented on the consultation, the proposed cost and location of the project, electricity and heat connections, and waste transportation. Comments were made in relation to the approach and delivery of the consultation, whilst others said the EfW CHP Facility was not the most cost-effective solution. Some comments were supportive of the location for the Proposed Development, others shared objections. Requests were also made for more information relating to the transport route proposals and logistics associated with the day to day running of the EfW CHP Facility.

4.2.59 One respondent expressed concerns about electromagnetic fields associated with the Grid Connection, whilst others considered there would be insufficient local capacity to make use of the available steam for heating and/or industrial processes.

Changes made to the project

4.2.60 The Applicant reviewed and considered all feedback received to the Non-Statutory Stage 1 Consultation and continued to develop the design of the Proposed Development. Changes made as a result of comments received during the Non-Statutory Stage 1 Consultation are summarised below. Further detail on the Proposed Development updates can be found in the Non-Statutory Consultation Booklet - Edition 3, which was available to the public and can be found on the

³ The Marine Management Organisation is not a prescribed consultee under the Planning Act 2008 for this Proposed Development as it does not affect any of the areas specified in s42(2) of the Act. However, the Applicant chose to consult with it due to the nearby River Nene being tidal.



Consultation and Planning section of the project website⁴. A copy of the Non-Statutory Consultation Booklet Edition 3 can be found in Appendix F of the Non-Statutory Stage 1b CFR, which has been included in **Appendix C** of this Report.

4.2.61 At this stage of the project, changes were focused around 3 key themes:

- The approach to consultation;
- Traffic movements; and
- Selection of a Grid Connection route.

The approach to Consultation

4.2.62 The Applicant revised the approach to consultation and included an additional stage of non-statutory consultation (Stage 1b), to provide an opportunity for public exhibition events and further feedback on the proposals. To allow sufficient time following the public exhibitions to properly consider feedback, the Applicant delayed the proposed application submission date by over a year to Q1 2022.

4.2.63 The Applicant also prepared a Stage 1b CFR to provide Stakeholders with a better understanding of how consultation feedback had been taken into account. The report was published on the project website. A copy of the Stage 1b CFR has been included in **Appendix C** of this Report.

Traffic Movements

4.2.64 In response to concerns raised at the Stage 1 Consultation about increased road traffic and, in particular, HGVs travelling to the site, further analysis was carried out to understand the type and size of vehicles that would access the site, the maximum capacity of the surrounding road network and the typical hours of delivery. The estimations were made publicly available at the Stage 1b Consultation in the Stage 1b Consultation Booklet. A copy of this can be found in Appendix F of the Stage 1b CFR, which has been included in **Appendix C** of this report.

Selection of a Grid Connection route

4.2.65 After the Stage 1 Consultation, and as part of the development and refinement of the Proposed Development, further engagement was undertaken with National Grid and UK Power Networks to determine the optimum connection point for the EfW CHP Facility. Due to the technical complexity, increased environmental impacts and additional costs, the 400kV connection option was discounted, with the 132kV connection selected as the preferred option.

4.3 Stage 1b Consultation

4.3.1 Due to postponement of the Stage 1 Consultation exhibitions, as a result of the COVID-19 pandemic and the associated social restrictions, the Applicant proposed

⁴ Non-Statutory Consultation Booklet – Edition 3 (18th September 2020): medworth-consultation-bookletissue-3web.pdf (mvv-medworthchp.co.uk)



an additional stage of Non-Statutory Consultation (the Stage 1b Consultation) on its proposals, prior to its Statutory Consultation (Stage 2).

4.3.2 An update to the Consultation Strategy was prepared and provided to the following host local authorities in July 2020⁵ on the approach to the Stage 1b Consultation:

- Borough Council of Kings Lynn and West Norfolk;
- Cambridgeshire County Council;
- Fenland District Council; and
- Norfolk County Council.

4.3.3 Feedback on the Strategy was received from all four host local authorities and was considered by the Applicant in finalising the approach to the consultation. The Consultation Strategy Update, including comments received from the host local authorities and the Applicant's response, is provided in Appendix A of the Stage 1b CFR at **Appendix C** of this Report.

4.3.4 In accordance with that Strategy, the Stage 1b Consultation on the emerging proposals was undertaken between 18 September and 29 October 2020.

Purpose of the consultation

4.3.5 The Stage 1b Consultation was a non-statutory consultation, undertaken at an early stage in the project development process, to provide consultees with an opportunity to influence the proposals whilst options were still being considered. As the public exhibitions proposed during the Stage 1 Consultation had to be postponed due to the COVID-19 pandemic, the consultation also provided an opportunity for consultees to attend public exhibitions and speak to members of the Applicant's project team.

4.3.6 The consultation was focussed on the strategic issues and options for the Proposed Development, with views sought on the core scheme, design options and any emerging preferences for the Proposed Development and its delivery.

When did the consultation take place?

4.3.7 The Stage 1b Consultation took place for a period of six weeks between 18 September and 29 October 2020.

Consultation zone

4.3.8 The Stage 1b Consultation was undertaken within the same identified consultation zone around the area of the Proposed Development used at the Stage 1 Consultation but was not restricted to respondents located in this area.

⁵ As defined under s42(1)(b) of the Planning Act 2008



4.3.9 A Consultation Zone with two distinct areas was defined with the objective of seeking the views of local communities and other parties interested in the Applicant's proposals. These areas are described below and illustrated in Appendix B of the Stage 1b CFR in **Appendix C** of this Report:

- Zone A – covered a two-kilometre radius of the Main Development Site boundary, plus the full extent of residential areas in Wisbech and Elm; and
- Zone B – represented a five-kilometre radius of the Main Development Site boundary. It also included a two-kilometre buffer around the potential Grid Connection options.

Who was consulted?

Prescribed consultees

4.3.10 Although the Stage 1b Consultation was non-statutory, a wide range of consultees drawn from the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 (the APFP Regulations) were contacted. In addition to the host local authorities, this included statutory bodies such as Natural England, Historic England and the EA, as well as parish councils.

4.3.11 A full list of those consulted is presented at Appendix C of the Stage 1b CFR in **Appendix C** of this Report.

Local authorities

4.3.12 The following local authorities as set out in **Table 4.4 Local authorities consulted during the Stage 1b Consultation** were notified of the consultation:

Table 4.4 Local authorities consulted during the Stage 1b Consultation

Section 43 Grouping	Description	Local authorities
A	A neighbouring authority that shares a boundary with a unitary council or lower tier district council within whose area the development is situated.	Breckland Council East Cambridgeshire District Council Huntingdonshire District Council North Norfolk District Council South Holland District Council The Broads Authority West Suffolk Council
B	Either a unitary council or lower tier district council in which the development is situated (a host authority).	Borough Council of King's Lynn and West Norfolk Fenland District Council
C	An upper tier county council in which the development is situated (a host authority).	Cambridgeshire County Council Norfolk County Council



Section 43 Grouping	Description	Local authorities
D	A Local Authority which is not a lower tier district council and shares a boundary with a 'C' authority.	Bedford Borough Council Central Bedfordshire Council Essex County Council Hertfordshire County Council Lincolnshire County Council Northamptonshire County Council Peterborough City Council Suffolk County Council

Local communities

4.3.13 Local community consultees were defined as:

- Individuals, owners/occupiers, businesses and groups based in the vicinity of the Proposed Development;
- Individuals who are users of the area or visitors to it (e.g., workers);
- Voluntary organisations (including residents' associations);
- Faith communities;
- Traveller communities⁶;
- Schools and colleges in the vicinity of the Proposed Development; and
- Local hospitals, care homes and private healthcare organisations in the vicinity of the Proposed Development.

Wider consultees

4.3.14 In addition to prescribed consultees and the local community, the Applicant consulted a number of other local bodies and individuals who are not identified in Schedule 1 of the APFP Regulations 2009. These included:

- Local bodies and technical consultees such as local Wildlife Trusts, the Bramley Line Heritage Trust and the National Trust; and
- County and Ward Councillors and MPs in relevant areas.

4.3.15 A full list of those consulted is presented at Appendix C of the Stage 1b CFR included in **Appendix C** of this Report.

⁶ During engagement with the host local authorities it was identified that there are traveller communities in the area. The Applicant worked with the local authorities to identify these groups and a potential community representative.



Consultation method

4.3.16 In accordance with the DCLG Guidance on pre-application consultation⁷, a range of methods and techniques were used to ensure that the various consultees identified above and all sections of the community that could be affected by the Proposed Development could be involved in the process.

Website

4.3.17 A dedicated project website (<https://www.mvv-medworthchp.co.uk/>) was launched in December 2019 and has run for the duration of the Proposed Development.

4.3.18 At the start of the Stage 1b Consultation, the consultation materials described below in **Section 4.3.34**, details of how to respond to the consultation, event locations, timings and Document Inspection Locations were available on a dedicated consultation section of the project website. The project website also included an interactive webpage for those unable to attend the consultation events (see **Section 4.3.29**).

4.3.19 Following the close of the Stage 1b Consultation, a library of documents remained available, but the webpage was updated to make clear that the consultation had closed. The electronic feedback form was removed but the general enquiries form remains active.

Project email address

4.3.20 A dedicated project email address (medworth@mvvuk.co.uk) was set up in November 2019 and remained active for the duration of the Project. During the Stage 1b Consultation period, eight enquiries (six via the email address and two via the electronic website contact form) were received and all such enquiries were individually responded to by the Applicant.

Community Contact Point

4.3.21 The community contact point (local rate telephone number) previously launched for the Stage 1 Consultation continued to remain in use for the Stage 1b Consultation. The contact point provided an answer phone and call-back service to ensure callers were able to leave a message in the event that staff were out of the office.

4.3.22 The contact point was available for consultees to discuss the Proposed Development, leave a message or request hard copies of project documents. Consultees could also request a telephone appointment to discuss the Proposed Development.

4.3.23 During the consultation the Applicant received seven calls to the phonenumber, which sought clarity on aspects of the Proposed Development or the approach to public exhibitions.

⁷ Department for Communities and Local Government (DCLG) 'Planning Act 2008: Guidance on the pre-application process' (March 2015).



Freepost address

4.3.24 A Freepost address (Freepost MVV) was created in February 2020 to ensure those without internet access could request, complete and return hard copies of the feedback form. At Stage 1b consultation, 13 hard copy responses were received via the Freepost address. Further details of the number of responses received can be found in **Section 4.3.43**.

Exhibitions

4.3.25 In total seven public exhibitions took place during the Stage 1b Consultation at the venues within the consultation zone, set out in **Table 4.5 Exhibition venues**. These were open exhibitions where members of the public could view the proposals, talk to project team representatives and receive guidance on completing feedback forms. Venues were primarily chosen on the basis of their suitability as a community facility, their proximity to potentially affected communities, disabled access, and availability.

4.3.26 Members of the project team, including their specialist environmental advisors, were on hand to answer questions from consultees attending the events. Exhibition boards explaining the background to the Proposed Development were displayed at all venues.

4.3.27 During the exhibitions a small amount of verbal feedback was provided, which respondents explicitly asked to be noted. This comprised a comment that a consultation invitation flyer hadn't been received, an in-principle objection to the project due to the 'smoke' that would be produced, and a suggestion that the Applicant consider widening out the area for leaflet distribution to outlying villages.

Table 4.5 Exhibition venues

Date	Timings	Exhibition Venue	Attendees
1 October 2020	10.00 – 16.00	Rosmini Centre, 69a Queens Road, Wisbech, PE13 2PH	13
2 October 2020	14.00 – 20.00	Wisbech St Mary Sports & Community Centre, Beechings Close, Wisbech St Mary, Wisbech, PE13 4SS	7
3 October 2020	10.00 – 16.00	Queen Mary Centre, Queens Road, Wisbech, PE13 2PE	30
13 October 2020	14.00 – 20.00	Marshland Hall, 156-158 Smeeth Rd, Marshland St James, Wisbech PE14 8JB	9
14 October 2020	14.00 – 20.00	Oasis Community Centre, St Michael's Ave, Wisbech PE13 3NR	11
15 October 2020	14.00 – 20.00	Tower Hall, Maltmas Drove, Friday Bridge, Wisbech, PE14 0HW	8



Date	Timings	Exhibition Venue	Attendees
16 October 2020	14.00 – 20.00	Walton Highway Village Club, Lynn Road, Walton Highway, Wisbech PE14 7DF	7

4.3.28 Due to the COVID-19 pandemic and the associated government guidance on social distancing and gatherings, the Applicant sought legal advice to ensure it complied with government guidance. A number of measures were put in place to ensure the safe running of the events and the health and safety of all staff and attendees. These comprised:

- COVID-19 risk assessment in conjunction with each of the proposed venues to understand the specific measures required and maximum capacity of each building;
- Implementation of clear safety signage and 2m floor spacing stickers throughout each venue;
- Arrangement of room layout and display materials to ensure social distancing could be achieved;
- Implementation of one-way system within venues wherever possible;
- Provision of disposable masks and hand sanitiser for attendees;
- Requirement for all attendees, including the Applicant's project team, to wear suitable face coverings;
- Implementation of pre-booking system, QR code at entrance and restricted entry procedure if the venue was getting full; and
- Restrictions on groups of no more than six at a time with 'crowd density' monitored throughout the duration of the event.

4.3.29 Recognising that some consultees may have been reluctant to attend public exhibitions due to COVID-19, the Applicant's project website included an interactive exhibition. This interactive exhibition allowed consultees to browse the exhibition boards and consultation materials at their leisure in a virtual environment before providing their feedback (see Appendix D of the Stage 1b CFR at **Appendix C** of this Report). The virtual exhibition also included details of how to arrange a telephone appointment with a member of the project team to discuss the Proposed Development and/or consultation materials.

Document Inspection Locations

4.3.30 The Consultation Strategy Update proposed that inspection copies of the consultation documents would be made available to view free of charge from the start of the consultation at seven locations within the consultation zone. The list of locations is provided in **Table 4.6 Document inspection locations**.


Table 4.6 Document inspection locations

Exhibition Venue	Address
Marshland Hall	156 – 158 Smeeth Rd, Wisbech PE14 8JB
Oasis Community Centre	St Michael's Ave, Wisbech, PE13 3NR
Rosmini Centre	69a Queens Rd, Wisbech, PE13 2PH
Wisbech Customer Services Centre*	Harbour Square, Boathouse Business Centre, Wisbech, PE13 3BH
Walton Highway Village Club	Lynn Road, Walton Highway, Wisbech, PE14 7DF
Wisbech Library**	Ely Place, Wisbech, PE13 1EU
Wisbech St Mary Sports and Community Centre	Beechings Close, Wisbech St Mary, Wisbech, PE13 4SS

* see Section 4.3.32

** see Section 4.3.33

- 4.3.31 Details of the opening hours and access arrangements for each of these venues were detailed on the project website.
- 4.3.32 The Applicant received verbal feedback from a resident who was unable to access the Wisbech Customer Services Centre or book an appointment to view the consultation materials there. Following a telephone conversation between the resident and a member of the Applicant's team, they attended an exhibition and hard copies were provided by the Applicant to be taken away for scrutiny.
- 4.3.33 Due to the COVID-19 pandemic, Wisbech Library advised that it was unable to allow access for members of the public to view the consultation documents. In response, the Applicant notified the host local authorities and displayed a poster at the venue advising members of the public of alternative venues where the documents could be inspected. The project website was also updated to confirm that this venue was unable to allow access.

Consultation materials

- 4.3.34 The following information was provided during the consultation electronically via the consultation webpage and, in hard copy, at the exhibitions set out within **Table 4.5 Exhibition venues** and the Document Inspection Locations set out within **Table 4.6 Document Inspection Locations**. Hard copies were also available on request via the community contact point (dedicated telephone line) and Freepost address.
- Consultation invitation flyer – Over 10,000 copies were issued to all addresses in Consultation Zone A, prescribed consultees, and wider Stakeholders. The leaflet provided an overview of the consultation, details of the public exhibitions and explained where the project information could be viewed and how feedback could be provided. A copy of the flyer is provided in Appendix E of the Stage 1b CFR included in **Appendix C** of this Report.



- Consultation booklet – The consultation booklet summarised the background of the Applicant and the Proposed Development, as well as providing information on the approach to managing any impacts of the proposals. It also explained how to take part in the consultation and where more information could be found. The document included the same information published at the Stage 1 Consultation, plus additional information on updates to the Proposed Development as a result of consultation feedback at Stage 1 and the further development and refinement of the proposals. It also included information about the proposed Liaison Group and demonstrated how the proposed CHP pipeline would not prevent the reinstatement of the railway line. A copy of the consultation booklet is provided in Appendix F of the Stage 1b CFR included in **Appendix C** of this Report.
- Stage 1 Consultation Feedback Report – A Consultation Feedback Report was published which detailed the approach to the Stage 1 Non-Statutory Consultation. The report also summarised the feedback received during the consultation and explained how it was being considered by the Applicant in the development and refinement of its proposals. A copy of this is provided in **Appendix B** of this Report.
- Technical information – The Environmental Impact Assessment (EIA) Scoping Report (see **Appendix A**) published to accompany the Stage 1 Consultation was available on the project website and in hard copy at all exhibition and Document Inspection Locations. This identified the potential likely significant impacts of the Proposed Development that would be considered in depth as part of the EIA, and the proposed scope of the assessment in relation to such impacts. A copy of the EIA Scoping Opinion provided by the Planning Inspectorate on behalf of the SoS was also made available. This is provided in **Appendix 1D of Chapter 1 of the ES**. The Grid Connection Corridor Options Report was also published and explained the planning, environmental, technical and cost factors taken into account when selecting the preferred route for the Grid Connection. A copy of this is provided in **Appendix L** of this Report.
- Feedback form – A feedback form was provided for anyone wishing to respond to the consultation. The feedback form was the same as that used during the Stage 1 Consultation and could be completed online via the project website or in writing by hard copy via the project Freepost address. A copy of this is provided in Appendix G of the Stage 1b CFR included in **Appendix C** of this Report.

Advertising and publicity

4.3.35 Advertisements were placed in the following local newspapers, circulating across the consultation zone, once each during the week commencing 14 September 2020:

- Fenland Citizen; and
- Wisbech Standard.

4.3.36 This advertised the consultation dates, exhibition dates and Document Inspection Locations, and directed people to where they could find out more about the



consultation. Copies of all newspaper advertisements are provided in Appendix H of the Stage 1b CFR at **Appendix C** of this Report.

- 4.3.37 A press release was issued to the above publications at the outset of consultation (14 September 2020). News updates were also published on the project website at the start of the consultation (14 September 2020), at the start of the first week of exhibitions (28 September 2020), the second week of exhibitions (9 October 2020) and at the close of consultation (21 October 2020).

Hard to reach groups

- 4.3.38 In addition to the methods outlined in preceding sections, to ensure that all Stakeholders were able to engage with and respond to the consultation, the Applicant offered a range of solutions for people requiring additional assistance. These included making the consultation documents available in large copy print, audio, or Braille on request. A translation service to provide documents in alternative languages was also available on request.
- 4.3.39 To support requests for hard copy documents and/or alternative document formats, a dedicated telephone number and Freepost address were provided throughout the period of the consultation.
- 4.3.40 A health and safety audit of the exhibition venues was undertaken to strike a suitable balance between accessibility of the buildings and proximity to the residents wishing to attend. All the exhibition locations selected were Disability Discrimination Act (DDA) compliant.

Feedback

- 4.3.41 The following arrangements were made to facilitate consultation feedback:
- Online feedback through the project website – An electronic feedback form was available on the project website. This could either be completed and submitted online or downloaded from the project website and posted via the Freepost address.
 - Email feedback – Email feedback could be submitted via the project email address
 - Hard copy feedback forms – Hard copy feedback forms were prepared for the public exhibitions, available at all Document Inspection Locations and were subsequently made available on request via the dedicated telephone line.
 - Hard copy by post – Hard copy responses could be submitted in writing to the Freepost address at 'Freepost MVV'.

Feedback received

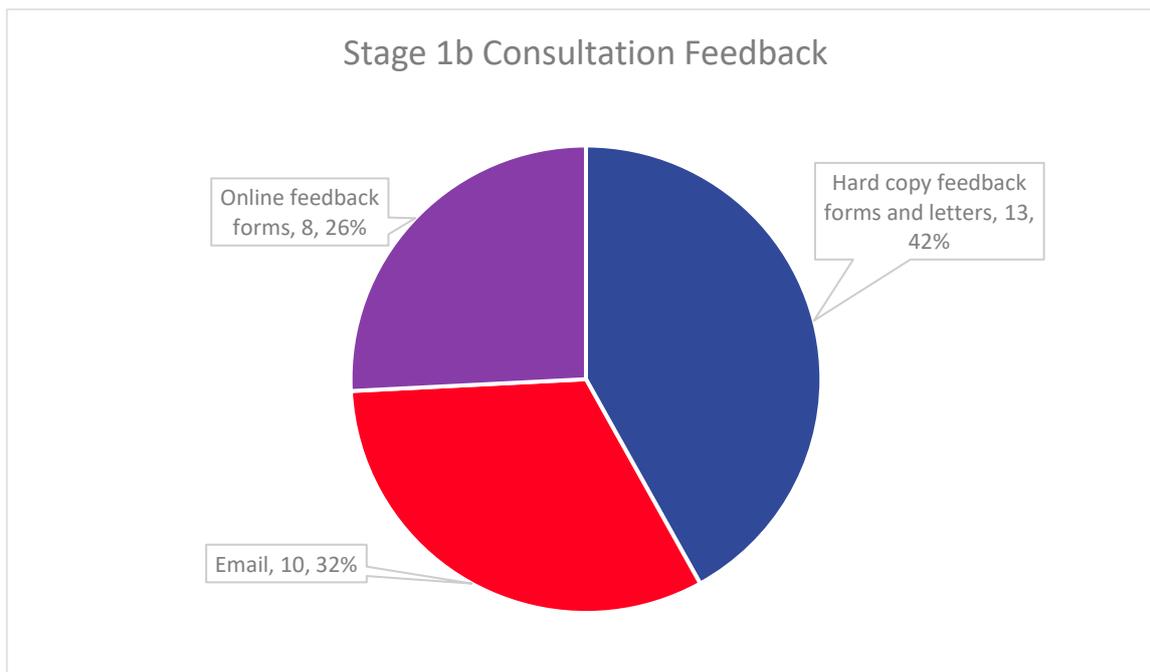
- 4.3.42 A total of 31 pieces of feedback were received in response to the Stage 1b Consultation.



4.3.43 Representations were received from local authorities, national and regional organisations, and the local community. The feedback received comprised:

- Hard copy feedback forms and letters – 13.
- Email – 10.
- Online feedback forms – 8.

Figure 4.2 Feedback Received at Stage 1b Consultation by type



Data processing and analysis

4.3.44 All representations received were logged with a unique identification number before being reviewed and analysed.

4.3.45 A coding framework was created to provide a list of themes and topics raised by the consultation feedback. The coding framework was applied by analysts to all feedback received. This enabled the capture and organisation of the issues raised in a systematic way and assisted in interrogation and analysis of the responses.

4.3.46 Once the coding framework had been applied to the feedback received, similar themes were grouped together and organised into categories. Summaries of the feedback by theme and topic were provided to the project team together with the raw responses received. This enabled the team to consider the feedback and take it into account in the design, assessment and evaluation processes.

4.3.47 All personal data received as part of the consultation was stored and protected in accordance with relevant data protection requirements as set out in the GDPR.

4.3.48 A record of the collated feedback received is provided in sections 4 to 7 of the Stage 1b CFR presented at **Appendix C** of this Report with a summary of the key issues arising and the Applicants regard to the feedback presented below.



Summary of responses to Stage 1b Consultation

4.3.49 The following section summarises the responses received to the Stage 1b Consultation. Responses were grouped thematically under the following headings:

- Design;
- Environment;
- Community; and
- Other Comments

4.3.50 Further detail on the responses received and how the Applicant responded to issues raised can be found in the Stage 1b CFR which can be found in **Appendix C** of this Report.

Design

4.3.51 Anglian Water, Cadent Gas, GTC Pipelines Limited and National Grid Electricity Transmission made comments relating to the general design of the Proposed Development. Anglian Water said that the design of the EfW CHP Facility did not appear to have changed since the previous consultation and reiterated its request that the location of its existing infrastructure should be considered further as part of the identification of a suitable route within the 132kV Grid Connection Corridor.

4.3.52 Cadent Gas and GTC Pipelines Limited provided information relevant to the development. Cadent Gas identified that there is gas apparatus in the vicinity of the Proposed Development, whilst GTC commented that the Proposed Development was unlikely to affect any of its assets. National Grid Electricity Transmission indicated that it had no further comments to make beyond those provided as part of their response to the EIA Scoping.

4.3.53 Members of the public made comments relating to the general design and visual impact of the Proposed Development. A number of comments expressed general opposition to the Proposed Development due to its size and design. Reasons for this included that access to the site was considered unsuitable, the site is too close to residential properties, food production facilities and schools and that the site is not located within, or adjacent to, an industrial area. Others commented that the proposed facility is appropriately located and within an industrial area.

4.3.54 A number of members of the public expressed concern about the visual impact of the EfW CHP Facility on the local landscape and views. Some suggested ways in which the visual impacts of the project could be minimised, including painting the chimney in similar colours to the surrounding landscape, siting the facility in the countryside and utilising wildlife-friendly landscaping around the proposed EfW CHP Facility.

Environment

4.3.55 Anglian Water and Royal Mail made comments relating to the assessment methodology and traffic impacts of the Proposed Development. Anglian Water requested that consideration be given to its comments relating to environmental



issues which were provided to the Planning Inspectorate on EIA Scoping and at the Stage 1 Consultation.

4.3.56 Royal Mail said that the Wisbech Delivery Office is in close proximity to the proposed EfW CHP Facility and the Applicant must aim to eliminate or minimise potential construction or operational impacts on its operational and business interests.

4.3.57 General objection to the proposals due to the perceived effects on the environment were made by members of the public. Specific concerns related to air quality and human health, flood risk, safety, traffic impacts, waste storage and disposal and wildlife. Concerns about emissions from the proposed EfW CHP Facility and their effect on human health were raised, specifically with reference to the potential emissions produced when the EfW CHP Facility is operational. Comments were also received which expressed concerns about the release of pollutants and the resulting impact on wildlife.

4.3.58 Requests for information were received on the number of reportable accidents at similar facilities operated by the Applicant, and the safety measures that would be in place in the event of a system failure. Comments relating to the potential traffic impacts were also received, with a number of respondents indicating that the existing road network is already congested and unsuitable. Others commented that the proposed site access is too small and passes in close proximity to housing. It was suggested that an alternative vehicular access from New Bridge Lane should be considered.

4.3.59 Requests were also made for information regarding the by-products produced from the incineration of waste and their safety and how the ash waste will be disposed of.

4.3.60 One respondent expressed general support for the proposed EfW CHP Facility subject to the Applicant delivering the infrastructure required to address the effects on transport, schools, and medical facilities. One respondent also queried whether consideration had been given to the potential location of the site within a flood plain.

Community

4.3.61 No comments were received from prescribed consultees in relation to the community topic.

4.3.62 Members of the public made comments relating to the local economy, jobs and local projects. Many of these expressed concerns that employment opportunities arising from the construction and operation of the proposed EfW CHP Facility would be limited for local residents, whilst others said there would be no benefit to local residents as a result of the Proposed Development. Other respondents considered that the Proposed Development would bring benefits to Wisbech and its residents.

4.3.63 The Applicant received a number of suggestions for local projects and organisations that it should consider supporting. These included the Oasis Community Centre, the Ferry Protect charity, local businesses and the local parish and town councils.



Other

- 4.3.64 The Ely Internal Drainage Board responded to clarify that the Project is outside of its control. The Office of the Police and Crime Commissioner for Cambridgeshire and Peterborough advised that it had forwarded email correspondence about the consultation to Cambridgeshire Constabulary Estates Department for their attention.
- 4.3.65 Members of the public made comments relating to consultation, electricity and heat connections and waste transportation.
- 4.3.66 A small number of comments were received about the approach to, and delivery of, the consultation. Some expressed concern that the Proposed Development would be constructed regardless of the opinions of the local population.
- 4.3.67 Some respondents said that it was not appropriate for consultation exhibitions to be held during COVID-19. However, one respondent was disappointed that the consultation event held at Wisbech St Mary was not attended by more people and suggested that the Applicant contact the parish council to further raise awareness.
- 4.3.68 Additional information was requested by a respondent, asking which local businesses would use the heat and power produced at the EfW CHP Facility.
- 4.3.69 Several respondents requested that the Applicant give consideration to reopening the rail connection to Wisbech, which could be used to transport waste to the EfW CHP Facility.

Changes made to the Project

- 4.3.70 The Applicant reviewed and considered all feedback received to the Stage 1b Consultation and continued to develop the design of its proposals. Changes made as a result of comments received during the Non-Statutory Stage 1b Consultation are summarised below. Further detail on project updates following the Stage 1b Consultation can be found in the Consultation Booklet provided at the Stage 2 Statutory Consultation. A copy of this Booklet has been included in **Appendix AA** of this report.
- 4.3.71 At this stage of the project, changes were focused around four key themes:
- Landscape and Visual;
 - Access improvements;
 - Future environmental requirements; and
 - Air quality and climate.

Landscape and Visual

- 4.3.72 The Applicant recognised that many respondents raised concerns during the Non-Statutory Stage 1b Consultation on how the EfW CHP Facility will fit into the existing landscape. The Applicant worked with architects to develop, and to improve, the external design of the main building for the EfW CHP Facility. This included the consideration of different roof forms and different shades of cladding. The Applicant



also prepared photographic images of the Proposed Development and 'fly through' computer visualisations of the Proposed Development for use at Stage 2 Statutory Consultation.

Access improvements

4.3.73 In response to comments about access to the proposed EfW CHP Facility, the Applicant considered alternative access options and proposed improvements to New Bridge Lane to enable lorries to access the EfW CHP Facility during operations. The alternative access proposals included the routing of operational traffic along Cromwell Road/Weasenham Lane/Algores Way as an alternative to a reopened New Bridge Lane. With regard to the potential to reopen the disused March to Wisbech Railway, the Applicant proposed the possibility of setting aside land within the EfW CHP Facility Site so as not to prejudice potential future proposals for a road bridge crossing. The proposed changes were taken forward as part of the Stage 2 Statutory Consultation.

Future Environmental Requirements

4.3.74 The Applicant recognised that many respondents objected to the Proposed Development due to its potential effect on the environment. As the design of the proposals has developed, the Applicant has taken into account the need to ensure that future environmental requirements can be delivered. This resulted in the Applicant setting aside land within the EfW CHP Facility to accommodate a future carbon capture and storage facility (CCS). CCS is not a legal requirement of projects such as the Proposed Development, but the Applicant has made sure that there is sufficient land to accommodate such a facility should this be required in the future. In addition, and in response both to comments received regarding traffic and transport, and future environmental improvements, the Applicant also set aside land for a future rail siding to allow for the importation of waste by train, should the disused March to Wisbech Railway be reopened.

4.3.75 Future environmental improvements also include for Biodiversity Net Gain (BNG) and following the close of the consultation the Applicant continued to undertake ecological surveys to understand the potential for biodiversity loss and hence enable it to undertake a calculation for new gain.

Air Quality and Climate

4.3.76 Feedback identified a common concern about the potential impact of emissions from the EfW CHP Facility on human health and climate change.

4.3.77 In response to this, a continuous air quality monitoring station was installed at Thomas Clarkson Academy in June 2021 to establish the baseline air quality which is in addition to the placement of diffusion tubes in locations throughout Wisbech as agreed with FDC. The scope of the ES previously agreed with the Planning Inspectorate in January 2020 requires that the Applicant consider two aspects relating to climate change:



1. The effect the facility might have in terms of reducing Greenhouse Gas (GHG) emissions.
2. The impact that climate change might have on the facility in the future.

4.3.78 These have been assessed for the construction, operation, and decommissioning phases of the development, as well as in relation to how they might affect the ability of the UK Government to meet its carbon reduction targets.

4.3.79 In addition, the future environmental improvements referenced in **Section 4.3.74** could reduce carbon emissions from the development as proposed.



5. Approach to Statutory Consultation

5.1 Introduction

- 5.1.1 This Chapter sets out details of the approach taken to formal consultation and publicity under Sections 42, 47 and 48 of the Planning Act 2008.
- 5.1.2 This Chapter summarises the purpose of the Stage 2 Statutory Consultation and the methods and activities that were used to undertake it. Details of the feedback received from this consultation, how the Applicant has had regard to it, and how it influenced the development of the Proposed Development is presented in **Chapters 7 to 18** of this Report.
- 5.1.3 Non-statutory engagement with consultees also continued prior to and following the Stage 2 Statutory Consultation. This included monthly meetings with host authorities (which allows officers from each authority to attend at the same time) and technical engagement with specific council officers and other statutory consultees on the approach to and scope of the environmental assessments as they were prepared.

5.2 Purpose of the consultation

- 5.2.1 The Stage 2 Statutory Consultation was undertaken to provide consultees with a further opportunity to influence the proposals prior to submission of the application. The consultation also provided an opportunity for consultees to attend public exhibitions and speak to members of the Applicant's project team. The consultation also ensured further opportunities to inform local people about the Proposed Development were utilised.
- 5.2.2 The consultation focussed on sharing how proposals had developed following the Stage 1b Non-Statutory Consultation and how feedback had been taken account of and incorporated into the Proposed Development. Views were also sought on design options and any emerging preferences for the Proposed Development and its delivery.
- 5.2.3 The preliminary results of the EIA were also published and consulted on as part of the Stage 2 Statutory Consultation. The PEIR and supporting documents set out the environmental assessments undertaken to date, explained what is proposed to be constructed, where it is proposed to be constructed and the decisions which have been made in developing the proposals. Views were sought on the information contained in the PEIR and its supporting documents.

5.3 When did the consultation take place?

- 5.3.1 The Stage 2 Statutory Consultation took place for a period of six and a half weeks between 28 June and 13 August 2021. This exceeds the statutory minimum of 28 days for statutory consultation under the Planning Act 2008.



5.4 Where did the consultation take place?

- 5.4.1 To ensure compliance with Sections 42(1)(d) and 47 of the Planning Act 2008, the consultation was undertaken within the following identified consultation zone around the area of the Proposed Development.
- 5.4.2 The consultation zone was the same as that used in the Stage 1 and 1b Consultations and had two distinct areas. These areas are described below and illustrated in **Appendix W**:
- Zone A – covered a two-kilometre radius of the Main Development Site boundary and Grid Connection, plus the full extent of residential areas in Wisbech and Elm; and
 - Zone B – represented a five-kilometre radius of the Main Development Site boundary and Grid Connection.
- 5.4.3 The consultation was not restricted to respondents located in these areas and feedback was welcomed from anyone with an interest in the Proposed Development. Information was made available online for electronic download and by request in hard copy via the consultation information phone line.

5.5 Who was consulted?

Section 42

- 5.5.1 A wide range of consultees drawn from the list in Schedule 1 of the APFP Regulations were contacted. A full list of those consulted is presented at **Appendix R**.
- 5.5.2 While the Applicant took steps to ensure that all relevant consultees were consulted across all three stages, some were identified later in the project development process and subsequently added to the list to be consulted during Stage 2 statutory consultation of consultation. Further information on these Stakeholders is provided in **Appendix R**.

Local authorities

- 5.5.3 In accordance with Section 42(1)(b) of the Planning Act 2008 the following local authorities were consulted. These are illustrated at **Appendix HH**:

Table 5.1 Local authorities consulted during the Stage 2 Statutory Consultation

Section 43 Grouping	Description	Local authorities
A	A neighbouring authority that shares a boundary with a unitary council or lower tier district council within whose area the development is situated	Huntingdonshire District Council North Norfolk District Council East Cambridgeshire District Council South Holland District Council Breckland Council



Section 43 Grouping	Description	Local authorities
		The Broads Authority West Suffolk Council
B	Either a unitary council or lower tier district council in which the development is situated (a host authority)	Fenland District Council Borough Council of King's Lynn and West Norfolk
C	An upper tier county council in which the development is situated (a host authority)	Cambridgeshire County Council Norfolk County Council
D	A Local Authority which is not a lower tier district council and shares a boundary with a 'C' authority	North Northamptonshire Council Peterborough City Council Suffolk County Council Bedford Borough Council Central Bedfordshire Council Essex County Council Hertfordshire County Council Lincolnshire County Council

Persons with an interest in land

5.5.4 In accordance with Section 42(1)(d) of the Planning Act 2008, persons with an interest in land (PILs) were consulted, as set out below:

- Category 1 – an owner, lessee, tenant or occupier of the land;
- Category 2 – a person interested in the land or has power to sell and convey the land or to release the land; and
- Category 3 – a person who would or might be entitled to make a claim under Section 10 of the Compulsory Purchase Act 1965 or Part 1 of the Land Compensation Act 1973 or Section 152(3) of the Planning Act 2008.

5.5.5 Land Agents acting on behalf of the Applicant undertook diligent inquiry to identify individuals in one or more of the categories set out above. This included a detailed review of all land ownership information.

5.5.6 The Applicant conducted a search to locate all registered land registry titles featured within the red line boundary. Landownership parcels were drawn to reflect unique ownership information.

5.5.7 Requests for information (RFI) were sent to landowners, requesting information about a recipient's own interests, associated third party interests and the spatial extent of land or property. Site visits were also undertaken where no RFIs had been returned or to clarify any gaps in information.

5.5.8 Where land ownership could not be ascertained through desktop or site referencing methods, the land referencing team erected notices on site, requesting information about the ownership of the land to which the notices were affixed. The notices



showed the land ownership boundary in question and provided details of how to contact the land referencing team with any relevant information.

5.5.9 A table of all PILs identified within Category 1, Category 2 and Category 3 is provided within **Appendix H** of this Consultation Report.

Section 47

Statement of Community Consultation (SoCC)

5.5.10 In accordance with Section 47(1) of the Planning Act 2008 the Applicant prepared a SoCC setting out how it proposed to consult, about its proposed application, with people living in the vicinity of the land. As part of its preparation and in accordance with Section 47(2) the Applicant consulted with local authorities on the approach to and content of the SoCC.

Draft SoCC

5.5.11 Following definition of the proposed application, a formal consultation was held on the draft SoCC between 26 February 2021 and 27 March 2021, a period of 29 days. Consultation on the draft SoCC took place with the following host local authorities⁸:

- Borough Council of Kings Lynn and West Norfolk;
- Cambridgeshire County Council;
- Fenland District Council; and
- Norfolk County Council.

5.5.12 This ensured that the Applicant understood how consultation might best be undertaken with those affected communities and that the views of these local communities could be taken into account when finalising the proposals for the Proposed Development.

5.5.13 Feedback on the draft SoCC was received from all four host local authorities and was considered by the Applicant as part of finalising the approach to the consultation. A full schedule of the responses received on the draft SoCC, the Applicant's response and whether it resulted in a change to the draft SoCC can be seen in **Appendix E**. A summary of the feedback received and the changes that were made to the draft SoCC is presented below:

1. Suggestions were received that the SoCC clarify that town and parish councils would be consulted on the proposals within the main body of the document, that all organisations due to be consulted should be listed in an appendix, and that the SoCC confirm that town and parish councils would be consulted. The Applicant updated the SoCC to make clear that town and parish councils are included as Prescribed Consultees and would be consulted in line with the requirements of Section 42 of the Planning Act. The Applicant considered that

⁸ As defined under s42(1)(b) of the Planning Act 2008



an appendix listing prescribed consultees was not required as these consultees are included under Section 42 of the Planning Act, rather than Section 47.

2. Suggestions were received that neighbouring waste planning authorities, including those in the wider East of England region, should be identified in the SoCC and consulted and engaged with. The Applicant considered that these waste authorities would be consulted with as neighbouring planning authorities as they would be included as prescribed consultees under Section 42 of the Planning Act. In light of this, no changes were made.
3. Comments were received which suggested that alternate arrangements, which might be put in place if face-to-face exhibitions could not be held at future statutory stages of consultation, should be agreed with the local planning authorities. Section 4.6.10 of the draft SoCC detailed that in the event that government advice and/or local circumstances change, it would be necessary to adjust the approach to public exhibitions. It stated that the Applicant would engage with the host local authorities to agree suitable alternative arrangements. No changes were therefore required to be made to the SoCC in response to these comments.
4. Suggestions were made that the scope of the DCO, the early EIA results, and changes arising from them, should be shared, and discussed with local planning authorities ahead of submission. The Applicant considered that its monthly update meetings with host local authorities provided an appropriate forum for sharing such updates, and consequently, no further changes needed to be made to the SoCC. The host local authorities would also be able to see the early EIA results in the form of the PEIR which would be published as part of the Stage 2 Statutory Consultation. Subsequent consultation opportunities to comment on the refinement of assessment methodologies, the scope of baseline surveys such as those for traffic and noise and the list of projects for the cumulative assessments would be provided and discussed with relevant council officers.
5. Comments were received which suggested that the dates of Town and parish council meetings should be considered when deciding the timing and length of consultation to ensure their ability to participate. The Applicant considered there to be sufficient opportunities for all consultees to provide feedback, noting that the proposed consultation period of 6.5 weeks exceeds the statutory minimum, and that significant advance notice would be provided.
6. A request was received that a consultation event take place at the Rosmini Centre. The Applicant confirmed that a consultation event was proposed to take place at the Rosmini Centre, as outlined in the draft SoCC.
7. Suggestions were received that attendees to consultation events should be supported in submitting their written comments. In response, the Applicant considered that members of the project team would be available at public exhibitions to assist with interpreting materials and provide guidance on the completion of feedback forms, including supporting the completion of feedback forms if requested by individuals, as set out in the draft SoCC.



8. Comments were received that agreed with the approach to Stage 2 Statutory Consultation, including the inclusion of well-publicised and staffed public exhibition events, rather than relying on online consultation in their place. These comments included representations that agreed with the venues for consultation events as set out in the draft SoCC. In response, the Applicant welcomed the support for the consultation approach and highlighted the importance of public exhibitions.
9. Similar comments were received that welcomed the advertising of the public exhibition events in advance in local newspapers, on flyers sent to local residents and businesses, and through the placement of posters in the local area. In response, the Applicant welcomed the support for the proposed measures to promote and raise awareness of the exhibition events, and the consultation more generally.
10. Support was received for the acceptance in the draft SoCC of verbal feedback where necessary to recognise exceptional circumstances which would otherwise prevent an individual's views from being taken into account. In response, the Applicant welcomed the support provided for the approach to verbal feedback.
11. Comments were received that agreed with the recognition in the draft SoCC that hard to reach groups would have the opportunity to participate in the statutory stage of consultation, including through the provision of documentation and materials during the consultation period and a public event at the Rosmini Centre. The Applicant welcomed the support for the measures detailed to ensure all members of the community were given the opportunity to participate in the consultation process.
12. Comments were received that considered the proposed approach to Stage 2 Statutory Consultation to be in line with CCC's Statement of Community Involvement (SCI) and that it went further than the minimum publicity requirements of the Infrastructure Planning (Publication and Notification of Applications etc.) (Amendment) Regulations 2020 to take account of the COVID-19 pandemic. In response, the Applicant welcomed this confirmation.
13. Objections were received to the use of the word 'reasonable' in connection with queries received to the dedicated telephone line for response within 10 working days. The Applicant amended the SoCC and removed the word 'reasonable' from this passage in line with this request.
14. Suggestions were received that the issuance of the Preliminary Environmental Information Report (PEIR) should include a 'plain English' non-technical summary for local residents to comment on during the Stage 2 Statutory Consultation. The Applicant confirmed that the PEIR would include a non-technical summary, and that the consultation booklet would include high level summaries of preliminary assessment findings. No changes were made to the SoCC in response to this.
15. Comments were received that welcomed reference to the fact that the list of wider Stakeholders to be consulted would be continually reviewed on the basis that they allowed access to the consultation for those situated beyond Zone B.



In response, the Applicant noted the comments and stated that they would continue to work with the host local authorities to ensure that anyone who requested inclusion as a consultee had the same opportunity to provide feedback as those prescribed by legislation. As a result, no changes were made.

16. Support was received for the draft SoCC and the additional consultation exhibition event and Document Inspection Location venues. In response, the Applicant welcomed the support for the draft SoCC and the proposed approach for Stage 2 Statutory Consultation. No changes were made to the SoCC in response to this.
17. Suggestions were received that press notices and advertising should also be published in Lynn News, the Eastern Daily Press, and Your Local Paper, the free local newspaper used for statutory press notices by KLWN. The SoCC was updated to reflect this.
18. Confirmation was sought on whether the host local authorities would be provided with hard copies of consultation documentation rather than electronic. In response, the Applicant confirmed that they would be sent a digital copy of the consultation materials at the outset of the consultation, and that hard copies of the materials would be available on request. As a result, no changes were made to the SoCC.
19. Suggestions were received that site notices be posted along the route of the proposed Grid Connection to publicise the Stage 2 Statutory Consultation. The Applicant considered that the displaying of posters on local notice boards and venues was more effective. No changes were made to the SoCC as a result.

Final SoCC

- 5.5.14 The SoCC was updated to incorporate changes to the wording, tone and content suggested by the host local authorities, is presented at **Appendix M**.
- 5.5.15 At the start of the Stage 2 Statutory Consultation the SoCC was made available for inspection at each of the Document Inspection Locations (see Table 5.4) and notice of the SoCC was placed in five publications circulating in the vicinity of the land (see Table 5.5). Additionally, the SoCC was also published online on the Project Website pages to support accessibility of information.
- 5.5.16 The Stage 2 Statutory Consultation on the proposed application was undertaken in accordance with the SoCC between 28 June and 13 August 2021. **Table 5.1 Summary of Compliance with the Consultation Methods set out in the SoCC** sets out a summary of the consultation methods set out in the SoCC and how the Applicant complied with them during the Stage 2 Statutory Consultation.



Table 5.2 Summary of Compliance with the Consultation Methods set out in the SoCC

Paragraph reference	Commitment	Evidence
3.1.8	Section 48 of the PA 2008 requires the proposed application for development consent to be publicised in local and national newspapers and for the applicant to invite responses on the proposals. We are publishing the notice of the proposed application at the same time as undertaking our Stage 2 Statutory Consultation with local planning authorities, statutory consultees, owners and occupiers of land and the general public in respect of the Project	Section 48 notices were placed in seven newspapers at the start of the Consultation. These ran between the 14 and 25 June 2021. Copies of the Section 48 notices are provided in Appendix I .
3.2.2	We will publicise and consult on the PEIR and will be seeking the local community's views on the information contained in it through the approaches set out in Section 4 of this document.	The PEIR and a non-technical summary were published as part of the Stage 2 Statutory Consultation. These were available to view on the project website, at consultation events, at the Document Inspection Locations and copies were available on request.
4.3.2	It is anticipated that the Stage 2 Statutory Consultation will run from 28 June 2021 until 13 August 2021 (a total of 6.5 weeks).	The Stage 2 Statutory Consultation commenced on 28 June 2021 and closed on the 13 August, running for a total of six and a half weeks.
4.3.3	All consultation responses will have to be received by 11.55pm on the final day of the consultation period (13 August 2021). The deadline will be made clear on the literature and other documents relating to the consultation.	The deadline for the receipt of consultation responses was included on the consultation invitation flyer (see Appendix N), posters (Appendix O) and the project website (Appendix P).
4.3.3	Postal responses received after this date with a date stamp on or before 13 August 2021 will be accepted.	A buffer period of 10 days was allowed for the receipt of postal responses with a date stamp on or before 13 August 2021. 6 electronic feedback forms, 1 email and 1 in-principle objection was received during this time, no postal responses were received. No new issues were raised in these responses.
4.4.2	At the same time as consulting the local community we will consult a wide range of statutory consultees on the proposed application in accordance with Section 42 of the PA 2008. These include: <ul style="list-style-type: none"> - Host and neighbouring local authorities; - Prescribed consultees (such as Natural England, the EA and town and parish councils); and - People with an interest in land that might be affected by the proposals 	Letters (see Appendix H) were sent to Section 42 consultees on 23 June 2021 to notify them of the Stage 2 Statutory Consultation, including hard copies of the site location plan and the Section 48 notice and links to the project website. These were re-issued on 30 June 2021 due to an administrative error with the addresses on the envelopes. Letters (see Appendix H) were also sent to Persons with an Interest in Land (PILs) as



Paragraph reference	Commitment	Evidence
		defined under Section 44 of the Act on 23 June 2021.
4.4.3	A copy of the Section 48 notice will also be sent to all of the “consultation bodies” in accordance with Regulation 13 of the EIA Regulations	A copy of the Section 48 notice was sent to the consultation bodies (as defined in the EIA Regulations) along with their letters (above). A copy of the notice is provided in Appendix Q .
4.4.4	<p>We have identified a number of individuals and organisations with whom we will voluntarily consult. These include:</p> <ul style="list-style-type: none"> - Bodies and individuals who are not defined as prescribed consultees in Schedule 1 of the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 (as amended). This includes local bodies and technical consultees such as local Wildlife Trusts, the National Trust, and the Royal Society for the Protection of Birds (RSPB); and - County and Ward Councillors and MPs in relevant areas. 	A list of non-statutory Stakeholders consulted as part of the Stage 2 Statutory Consultation is provided in Appendix R .
4.4.5	A proposed list of the wider Stakeholders to be consulted will be continually reviewed in light of discussions with the local authorities and consultation feedback, to ensure that anyone who requests to be included as a consultee has the same opportunity to provide feedback as those prescribed under the relevant legislation.	A list of wider Stakeholders consulted as part of the Stage 2 Statutory Consultation is provided in Appendix R .
4.6.2	At the start of the Stage 2 Statutory Consultation, an invitation flyer notifying consultees about the consultation will be issued to everyone in the Zone A consultation area. This will provide a summary of information about the Project and details of the consultation, including how to get involved and where more information can be found.	A copy of the invitation flyer sent in the week commencing 5 July 2021, notifying consultees of the Stage 2 Statutory Consultation, is provided in Appendix N .
4.6.3	Properties in Zone B will not receive a direct mail but will be notified of the consultation through a combination of online and printed advertising	<p>Posters notifying consultees in Zone B of the Stage 2 Statutory Consultation were distributed by email to parish councils (see Appendix FF) for further distribution. A copy of the poster is provided in Appendix O.</p> <p>Online advertisements were placed on the websites of the Fenland Citizen and Wisbech Standard. Copies of these digital advertisements are provided in Appendix II.</p>



Paragraph reference	Commitment	Evidence
4.6.4	The dedicated project website (https://www.mvv-medworthchp.co.uk/) will provide information about the Stage 2 Statutory Consultation, as well as being a resource for all project materials.	Screenshots of the project website displaying information on the Stage 2 Statutory Consultation, and providing consultation materials, is included in Appendix P .
4.6.5	The website meets all standards in terms of accessibility and usability; it will contain videos and infographics to help explain the Project, the content of the consultation, an interactive virtual exhibition, an online feedback form and contact details so that the public and other Stakeholders can respond.	Screenshots of the project website displaying information on the Stage 2 Statutory Consultation, including the interactive exhibition webpage and online feedback form, is included in Appendix P .
4.6.6	Following the close of the consultation the website will continue to provide a library of documents that were available during consultation but will clearly indicate that the consultation has closed.	<p>The project website was updated following the close of the consultation period to read:</p> <p><i>“The statutory consultation concluded on 13th August.</i></p> <p><i>Thank you to everyone who came to our exhibitions and provided feedback. We have received over 250 feedback forms from the consultations, these will be gathered in the Consultation Feedback Report, along with our responses to the points raised.”</i></p> <p>A link was provided to the library of documents provided in the consultation available for view following close of the consultation period.</p>
4.6.7	<p>For the Stage 2 Statutory Consultation, we have produced a number of documents, maps and plans showing the nature and location of the proposed Project. These documents are designed to assist people who wish to comment on the Project. These include:</p> <ul style="list-style-type: none"> - Consultation booklet – A non-technical document summarising the elements of the Project, as well as information on potential impacts and the approach to managing them. - Feedback form – A feedback form will be provided for anyone wishing to respond, highlighting the specific matters on which we are seeking feedback. The feedback form will be capable of being completed by hand (and will be returnable using a ‘Freepost’ address) or online via the project website. 	The consultation documents listed under Section 5.6.2 were published for inspection and feedback as part of the Stage 2 Statutory Consultation.



Paragraph reference	Commitment	Evidence
	<p>- Consultation Feedback Reports – Documents explaining how the feedback received during the Stage 1 and 1b Non-Statutory Consultations has been taken into account in the development of the proposed application.</p> <p>- Environmental assessments – Comprising our PEIR and supporting documents which set out our environmental assessments to date, explain what we propose to construct, where we propose to construct it and the decisions we have made in developing our proposals.</p>	
4.6.8	Copies of consultation documents, including the feedback form, will be made available to download from the project website and will be available for inspection at public exhibitions and deposit locations.	Copies of all consultation documents were available for inspection at the public exhibition events and Document Inspection Locations detailed in Table 5.3 and Table 5.4 , respectively. All documents were also available for download from the project website.
4.6.10	Public exhibitions will be held in Disability Discrimination Act 1995 (DDA) compliant and accessible venues which are known to the local community.	Public exhibition events were held at the following DDA-compliant, accessible venues known to the local community: <ul style="list-style-type: none"> • Queen Mary Centre • Oasis Community Centre • Wisbech St Mary Sports & Community Centre • Rosmini Centre • Walton Highway Village Club • Marshland Hall • Walpole Community Centre • Tower Hall
4.6.10	Members of the project team will be available to answer questions about the Project, assist with the interpretation of materials and provide guidance on the completion of feedback forms	Members of the project team were on hand to answer questions from attendees to the consultation exhibition events. Photographs of the project team at the exhibition events are provided in Appendix S .
4.6.10	If government advice and/or local circumstances change, and it is necessary to adjust the approach to public exhibitions, we will engage with the host local authorities to agree suitable alternative arrangements; these may include alternative public exhibition venues or digital consultation events/activities	Government advice and local circumstances remained unchanged for the consultation period, meaning that it was not necessary for alternative arrangements to be agreed.



Paragraph reference	Commitment	Evidence
4.6.11	<p>“The exhibitions will be held at the venues set out in Table 4.1 between 12 July 2021 and 25 July 2021 between 2pm and 8pm Monday – Friday and between 10am – 4pm on Saturday.</p> <ul style="list-style-type: none"> • - Rosmini Centre • - Queen Mary Centre • - Oasis Community Centre • - Tower Hall • - Marshland Hall • - Walton Highway Village Club • - Walpole Community Centre • - Wisbech St Mary Sports and Community Centre” 	<p>The exhibition events were held at the listed venues between 12 July 2021 and 25 July 2021 between 2pm and 8pm Monday – Friday and between 10am – 4pm on Saturday. Photographs of banner posters outside the exhibition venues displaying the dates and times of the events are provided in Appendix T.</p>
4.6.11	<p>We will liaise with each venue and, should they become unavailable due to the COVID-19 pandemic, a suitable alternative will be secured; as a last resort, that public exhibition would be cancelled.</p>	<p>Venues did not become unavailable due to the COVID-19 pandemic, meaning that it was not necessary for alternative venues to be secured.</p> <p>The venue times for the exhibition event at Walpole Community Centre had to be altered to enable cleaning at the venue required by Covid-19 health and safety guidelines. The Applicant notified the host local authorities of the change, updated the project website and displayed updated posters at the venue.</p>
4.6.12	<p>The public exhibitions will be promoted through project materials sent directly to Stakeholders, the project website, locally displayed posters, local press and local leafleting.</p>	<p>The public exhibitions were promoted through the invitation flyer (see Appendix M), posters (see Appendix O), advertisements (see Appendix U) and on the project website (see Appendix P).</p>
4.6.13	<p>Where any exhibition event referred to in Table 4.1 is cancelled or rearranged for any reason, as much notice as possible will be given. Notice of any alternative arrangements (if any are reasonably considered necessary by us) will be given as soon as possible after the cancellation or rearrangement is made.</p>	<p>The venue times for the exhibition event at Walpole Community Centre had to be altered to enable cleaning at the venue required by COVID-19 pandemic health and safety guidelines. The Applicant notified the host local authorities of the change, updated the project website and displayed updated posters at the venue.</p>
4.6.13	<p>The public will be informed via press releases issued to the local media, posters displayed locally and through the website.</p>	<p>As exhibition events were not cancelled, it was not necessary for this promotional activity to be undertaken.</p> <p>Due to altered venue times for the exhibition event at Walpole Community Centre to enable cleaning, the Applicant notified the host local authorities of the change, updated the project website and displayed updated posters at the venue.</p>



Paragraph reference	Commitment	Evidence
4.6.14	<p>“Subject to access limitations or social distancing imposed as a result of the COVID-19 pandemic, full sets of the consultation documents will be made available for inspection at the locations detailed in Table 4.2 throughout the consultation period. If local circumstances change and it is necessary to adjust the approach to Document Inspection Locations, we will engage with the host local authorities to agree suitable alternative arrangements.</p> <ul style="list-style-type: none"> - Oasis Community Centre - Wisbech St Mary Sports and Community Centre - Marshland Hall - Rosmini Centre - Walton Highway Village Club” 	<p>Due to the COVID-19 pandemic and the consequent reduction in customers attending the club, Walton Highway Village Club advised that the opening hours advertised did not match current arrangements. The Applicant notified the host local authorities and displayed a poster (see Appendix V) in the window of the club from 8 July in the event an interested party attended the venue outside opening hours. The project website was also updated to reflect the current opening hours.</p>
4.6.15	<p>In line with changes to certain publicity requirements introduced by the Infrastructure Planning (Publication and Notification of Applications etc.) (Amendment) Regulations 2020, the consultation documents will also be made available for inspection on the project website. Hard copies will also be available on request through the community contact point.</p>	<p>The consultation documents were made available on the project website (see Appendix P) during the consultation period.</p> <p>Hard copy consultation documents remained on request through the Community Contact Point.</p>
4.6.17	<p>At the start of the consultation, we will publish statutory notices (as outlined in Section 3) in local and national newspapers giving details about the consultation</p>	<p>Notices of the SoCC were placed in five newspapers and ran between the 14 and 18 June 2021. Copies of these notices are provided in Appendix F.</p> <p>Section 48 notices were placed in seven newspapers at the start of the Consultation. These ran between the 14 and 25 June 2021. Copies of the Section 48 notices are provided in Appendix I.</p>
4.6.18	<p>“At the start of the consultation, we will publish an advert in the publications set out in Table 4.3 to raise awareness about the consultation and encourage people to take part.</p> <ul style="list-style-type: none"> • - Fenland Citizen • - Lynn News • - Wisbech Standard • - Eastern Daily Press • - Your Local Paper” 	<p>Advertisements were placed in the following newspapers to promote the consultation and encourage participation:</p> <ul style="list-style-type: none"> • Cambs Times • Eastern Daily Press • Fenland Citizen • Lynn News • Your Local Paper <p>Copies of advertisements are provided in Appendix U.</p>



Paragraph reference	Commitment	Evidence
4.6.19	A community contact point (local rate telephone number) has been set up for questions relating to the Project. Consultees are able to call this contact point to discuss the Project, leave a message or request hard copies of project documents. Consultees can also request a telephone appointment to discuss the Project.	The community contact point answerphone service was live and operational 24 hours a day for the duration of the consultation.
4.6.20	We aim to respond within 10 working days to all queries related to the consultation and the Project. There is also a dedicated email address, medworth@mvvuk.co.uk, from which all queries relating to the consultation and the Project will receive a response.	The dedicated project email address was live during the consultation period and continues to be available. 31 enquiries were received and responded to through this channel.
4.6.21	<p>“A number of methods will be used, prior to and during the consultation, to ensure that all consultees are given the opportunity to find out more and take part. These include:</p> <ul style="list-style-type: none"> - Flyer – As set out above, a consultation invitation flyer will be issued to residents and businesses within the Zone A consultation area prior to, or at the launch of, consultation inviting them to get involved. - Press notices and advertising – Adverts detailing event locations and timings will be placed in appropriate publications, e.g., local newspapers and posters across Zone A and B consultation areas. - Stakeholders, groups and organisations – A range of Stakeholders, bodies and organisations will be engaged to make them aware of the consultation and, where appropriate, provide details of how their membership can get involved” 	<p>A copy of the consultation invitation flyer sent to residents and businesses in Consultation Zone A is included in Appendix N.</p> <p>Advertisements detailing event locations and timings were placed in local newspapers. Copies of the advertisements are provided in Appendix U.</p> <p>Posters notifying consultees in Consultation Zones A and B of the Stage 2 Statutory Consultation were distributed by email to town and parish councils (see Appendix FF) for further distribution. A copy of the poster is provided in Appendix O.</p> <p>Lists of prescribed and wider consultees consulted in the Stage 2 Statutory Consultation are provided in Appendix R.</p>
4.6.22	<p>“The Applicant recognises that some consultees will not be able to participate in the consultation without assistance and will ensure that all groups and members of the community have the opportunity to participate and are not disadvantaged in the consultation process. As a result, we will:</p> <ul style="list-style-type: none"> - Ensure all exhibition venues are DDA compliant; 	<p>Public exhibition events were held at the following DDA-compliant, accessible venues known to the local community:</p> <ul style="list-style-type: none"> • Queen Mary Centre • Oasis Community Centre • Wisbech St Mary Sports & Community Centre • Rosmini Centre • Walton Highway Village Club • Marshland Hall



Paragraph reference	Commitment	Evidence
	<ul style="list-style-type: none"> - Utilise where possible, local venues known to be used and accessible by hard-to-reach groups; - Provide translation services where appropriate/on request; and - Publish the consultation booklet in large copy print, audio or Braille on request” 	<ul style="list-style-type: none"> • Walpole Community Centre • Tower Hall <p>Translation services were available on request where appropriate. Large-copy print, audio and Braille versions of the consultation booklet were also available on request.</p>
5.1.2	Verbal feedback will not be accepted via the community contact point or at exhibitions except where necessary to recognise an individual’s particular exceptional circumstances which would otherwise stop their view from being taken into account. Assistance with completing feedback forms will be provided at exhibitions for those who request it.	In instances where verbal feedback was accepted at exhibition events to respond to exceptional circumstances members of the project team transcribed this onto hard copy feedback forms for consideration in the consultation.
5.1.3	All responses received will be analysed and considered in the development of the DCO application for the Project.	All feedback received to the Stage 2 Statutory Consultation was analysed and considered in the development of the DCO application. Details of the regard had to this feedback, including the Applicant’s response is included in Chapters 8 to 19 .
5.1.4	Any personal data received as part of the consultation or as part of the consultation process will be stored and protected as per relevant data protection requirements as set out in the GDPR.	Personal data received to the consultation was stored as per GDPR requirements.
5.2.1	In accordance with Section 37(3)(c) of the PA 2008, a Consultation Report will be submitted with the application for development consent. This will report on both the non-statutory and statutory pre-application consultations to demonstrate how all statutory requirements relating to consultation and publicity (including compliance with the PA 2008) have been met, how DCLG Guidance has been taken into account and how the feedback received has influenced the application.	This document constitutes the Consultation Report that reports on the non-statutory and statutory pre-application consultations to demonstrate how all statutory consultation and publicity requirements have been met, how DCLG guidance has been considered and how feedback received has influenced the application.
6.1.3	If it is necessary to undertake further geographically targeted engagement, this would be undertaken, where relevant, in accordance with the principles and methods set out in this SoCC. The timetable and programme for the engagement would be publicised in the affected area via methods judged to be most appropriate by the Applicant.	Presentations providing information on the Project were offered to parish councils, but this offer was not taken up.



Paragraph reference	Commitment	Evidence
6.1.4	We will continue to update the public and other Stakeholders on our proposals at appropriate milestones throughout the Project, primarily through our project website and engagement activities	The project website continued to contain information and documentation relating to the Project following the close of the consultation period. A news update was posted to the project website on the 23 August 2021 following the close of the consultation to thank consultees for their feedback and outline how their responses would be taken into account.

Wider Stakeholders

5.5.17 In addition to prescribed consultees and the local community, the Applicant consulted a number of other local bodies and individuals who are not identified in Schedule 1 of the APFP Regulations 2009. These included:

- Local bodies and technical consultees such as local Wildlife Trusts, the Royal Society for the Protection of Birds, the Bramley Line Heritage Trust, and the National Trust; and
- County and Ward Councillors and MPs in relevant areas.

5.5.18 A full list of those consulted is presented in **Appendix R**.

5.6 Consultation method

5.6.1 In accordance with the requirements of the Planning Act 2008 and DCLG Guidance on pre-application consultation⁹ a range of methods and techniques were used to ensure that the consultation was inclusive and open to all.

Consultation materials

5.6.2 The following information was provided during the consultation electronically via the project website and, in hard copy, at the exhibitions set out within **Table 5.3 Exhibition venues** and the Document Inspection Locations set out within **Table 5.4 Document Inspection Locations**. Hard copies were also available on request via the community contact point and Freepost address.

Consultation invitation flyer

5.6.3 At the start of the Stage 2 Statutory Consultation, an information flyer notifying consultees about the consultation was issued to all residential and business addresses in Consultation Zone A in the first week of July 2021. The flyer provided

⁹ Department for Communities and Local Government (DCLG) 'Planning Act 2008: Guidance on the pre-application process' (March 2015).



an overview of the consultation, details of the public exhibitions, explained where the project information could be viewed, and how feedback could be provided.

- 5.6.4 Over 10,000 copies of the consultation invitation flyer were sent. Copies of the flyer were also provided in hard copy at all Document Inspection Locations. A copy of the flyer is presented in **Appendix N**.

Posters

- 5.6.5 Banners advertising the Stage 2 Statutory Consultation and the public exhibition events were erected by the Applicant at or close to the selected venues (detailed in Table 5.3). All banners were erected between 28 and 29 June 2021, apart from at Walpole Community Centre where the banner was erected in the week of the exhibition event at the venue, in the week commencing 19 July 2021. Information on the banners and photographs of the banners in situ are presented at **Appendix T**.
- 5.6.6 Posters were also erected at the Document Inspection Locations listed in **Table 5.4 Document Inspection Locations** to advertise them as venues where hard copies of the consultation documents could be viewed. The posters also advised visitors to ask members of staff at the venue if materials were not visibly on display. Photographs of the posters in situ at the Document Inspection Locations are included in **Appendix Z**.

Consultation booklet

- 5.6.7 To ensure accessibility of the project information to a range of audiences, a consultation booklet was produced. This was written in plain English and in a style intended to enable people to access information at a non-technical level.
- 5.6.8 The consultation booklet summarised the background to the Applicant and the Proposed Development, as well as providing information on the approach to managing any impacts of the Proposed Development. The consultation booklet also provided an update on the proposals for associated infrastructure, possible options for the Grid Connection and the proposed alternative access at New Bridge Lane. A copy of the booklet is presented in **Appendix AA**.

Statement of Community Consultation

- 5.6.9 The Statement of Community Consultation, developed as set out in **Section 5.2**, was published on 24 June 2021, and was made publicly available on the project website and in hard copy at all exhibitions and Document Inspection Locations.

Stage 1b Consultation Feedback Report

- 5.6.10 A CFR was published which detailed the approach to the Stage 1b Non-Statutory Consultation. The report summarised the feedback received during the consultation and explained how it was being considered by the Applicant in the development and refinement of its proposals.



Technical information

- 5.6.11 The Preliminary Environmental Information Report (PEIR) set out the preliminary results of the EIA on the likely significant effects of the Proposed Development. In Chapter 1 of the PEIR, the Applicant stressed the need for consultee comments to be received regarding any views on ways the PEIR could be improved to inform the preparation of the Environmental Statement.
- 5.6.12 A Habitats Regulation Assessment (HRA) Draft Screening Report provided information on the scope, approach, and preliminary conclusions of the HRA screening. A clarification note was published as part of the consultation to explain that the Draft Screening Report reflected the scheme design at that time at which it was prepared (October 2020) and explained that its purpose at that time had been to support engagement with Natural England. As a consequence, the Draft Screening Report did not assess some aspects which formed part of the proposed application being consulted on, for example the two Grid Connection Options or alternative Temporary Construction Compounds. Neither did it report on the findings of the air quality assessment reported within the PEIR. The clarification note was also made available on the project website and in hard copy at all the exhibitions and Document Inspection Locations.
- 5.6.13 The draft Outline Construction Environmental Management Plan (CEMP) set out the proposed responsibilities and environmental standards that the Applicant would contractually require the Principal Contractor(s) (and any sub-contractors) to adopt for the construction of the Proposed Development.
- 5.6.14 The Draft Waste Fuel Availability Assessment (DWFAA) demonstrated how the Proposed Development conforms both to the waste hierarchy and relevant waste plans and strategies.

Feedback form

- 5.6.15 A feedback form was provided for anyone wishing to respond to the consultation. The feedback form contained eight questions structured under the following themes/topic area (a copy of the feedback form is provided at **Appendix BB**):
- Principles of the Proposed Development;
 - Potential impacts of the Proposed Development;
 - Environment and mitigation measures;
 - Grid Connection options;
 - Waste delivery routes and infrastructure improvements;
 - Community benefits;
 - General comments; and
 - How consultees would like to be kept informed.
- 5.6.16 The form could be completed online via the project website or in writing by hard copy via the project Freepost address.



Channels of communication

5.6.17 A number of communication channels were used to allow consultees to access project information and contact members of the team.

Website

5.6.18 The dedicated project website (<https://www.mvv-medworthchp.co.uk/>) launched in December 2019 remained active during the Stage 2 Statutory Consultation. The project website provided all of the consultation materials described from paragraph 5.6.2. The project website included details of how to respond to the consultation, event locations and timings, and Document Inspection Locations. The project website also included an interactive exhibition for those unable to attend the consultation events (see paragraph 5.6.32).

5.6.19 During the consultation period, the project website received 3,977 page views from 1,396 unique users.

5.6.20 Following the close of the Stage 2 Statutory Consultation, a library of the consultation documents remained available, but the webpage was updated to make clear that the consultation had closed. The electronic feedback form was removed but the general enquiries form remains active.

Project email address

5.6.21 The dedicated project email address (medworth@mvvuk.co.uk) set up for the Project in November 2019 remained in use for the Stage 2 Statutory Consultation and was identified as a method of contact on the project website and in the consultation materials.

5.6.22 During the consultation, 42 enquiries (31 via the email address and 11 via the electronic website contact form) were received through this channel and all enquiries were individually responded to by the Applicant.

Community Contact Point

5.6.23 A community contact point (local rate telephone number) previously launched for the Stage 1 and 1b Consultations continued to remain in use throughout the Stage 2 Statutory Consultation for questions relating to the Proposed Development. This has remained active for the duration of the Project and will remain in place until the DCO application has been determined.

5.6.24 The community contact point was available for consultees to discuss the Proposed Development, leave a message or request hard copies of project documents. Consultees could also request a telephone appointment to discuss the Proposed Development.

5.6.25 During the Stage 2 Statutory Consultation, the Applicant received 53 calls to the phonenumber, which sought clarity on aspects of the Proposed Development or the consultation.



Freepost address

5.6.26 The Freepost address (Freepost MVV) set up in February 2020 continued to operate during the Stage 2 Statutory Consultation to ensure that those without internet access could request, complete, and return hard copies of the feedback form. 34 hard copy responses were received through the Freepost address. Further details of the number of responses received can be found in **Section 6.3**.

Exhibitions

5.6.27 In total eight public exhibitions took place during the consultation at venues within the consultation zone (see **paragraph 5.4.2**). These were open exhibitions where members of the public could view the proposals, talk to project team representatives, and receive guidance on completing feedback forms. Venues were chosen because they were established community facilities, proximate to potentially affected communities, had disabled access and were available.

5.6.28 Details of the public exhibitions were provided on the project website, by direct communications, locally displayed posters and by press advertising. In total 313 people attended the exhibitions. **Table 5.3 Exhibition Venues** below provides details of venue locations, dates, times, and the number of attendees at each exhibition.

5.6.29 Members of the project team, including their specialist environmental advisors, were on hand to answer questions from members of the public attending the events. Exhibition boards explaining the background to the Proposed Development were displayed at all venues.

Table 5.3 Exhibition venues

Date	Timings	Exhibition Venue	Attendees
13 July 2021	14.00 – 20.00	Queen Mary Centre, Queens Road, Wisbech, PE13 2PE	66
14 July 2021	14.00 – 20.00	Oasis Community Centre, St Michael's Ave, Wisbech PE13 3NR	25
16 July 2021	14.00 – 20.00	Wisbech St Mary Sports & Community Centre, Beechings Close, Wisbech St Mary, Wisbech, PE13 4SS	29
17 July 2021	10.00 – 16.00	Rosmini Centre, 69a Queens Road, Wisbech, PE13 2PH	51
19 July 2021	14.00 – 20.00	Walton Highway Village Club, Lynn Road, Walton Highway, Wisbech PE14 7DF	49
20 July 2021	14.00 – 20.00	Marshland Hall, 156-158 Smeeth Rd, Marshland St James, Wisbech PE14 8JB	35
21 July 2021	12.00 – 18.00*	Walpole Community Centre, Summer Close, Walpole St Andrew, Wisbech, PE14 7JW	13



Date	Timings	Exhibition Venue	Attendees
22 July 2021	14.00 – 20.00	Tower Hall, Maltmas Drove, Friday Bridge, Wisbech, PE14 0HW	45

* see paragraph 5.6.31

5.6.30 Due to the COVID-19 pandemic and the associated government guidance on social distancing and gatherings, the Applicant put in place a number of measures to ensure the safe running of the events and the health and safety of all staff and consultees. These comprised:

- COVID-19 pandemic risk assessment in conjunction with each of the proposed venues to understand the specific measures required and maximum capacity of each building;
- Implementation of clear safety signage and 2m floor spacing stickers throughout each venue;
- Arrangement of room layout and display materials to ensure social distancing could be achieved;
- Implementation of one-way system within venues wherever possible;
- Provision of disposable masks and hand sanitiser for attendees;
- Requirement for all attendees, including the Applicant's project team, to wear suitable face coverings;
- Implementation of pre-booking system, QR code at entrance and restricted entry procedure if the venue was getting full; and
- Restrictions on groups of more than six at a time with 'crowd density' monitored throughout the duration of the event.

5.6.31 To enable Walpole Community Centre to be cleaned after the exhibition and before an existing community booking (a COVID-19 pandemic health and safety requirement), the Applicant agreed with the venue's manager to alter the exhibition times from 2pm to 8pm, to 12pm to 6pm. The Applicant notified the host local authorities of the changes to exhibition times and updated the project website to reflect this. Updated posters displaying the new exhibition times were also displayed at the venue.

5.6.32 Recognising that some consultees may have been reluctant to attend public exhibitions due to COVID-19, the Applicant's project website included an interactive exhibition webpage. This interactive webpage allowed consultees to browse the exhibition boards and consultation materials at their leisure in a virtual exhibition environment before providing their feedback (see **Appendix X**). The interactive webpage also included details of how to arrange a telephone appointment with a member of the project team to discuss the Proposed Development and/or consultation materials.



Document Inspection Locations

5.6.33 The SoCC proposed that inspection copies of the consultation documents would be made available to view free of charge from the start of the consultation at five locations within the consultation zone (see paragraph 5.4.2). The list of locations is provided below in **Table 5.4 Document inspection locations**:

Table 5.4 Document inspection locations

Document Inspection Location	Address
Oasis Community Centre	St Michael's Ave, Wisbech, PE13 3NR
Wisbech St Mary Sports and Community Centre	Beechings Close, Wisbech St Mary, Wisbech, PE13 4SS
Marshland Hall	156 – 158 Smeeth Rd, Wisbech PE14 8JB
Rosmini Centre	69a Queens Rd, Wisbech, PE13 2PH
Walton Highway Village Club*	Lynn Road, Walton Highway, Wisbech, PE14 7DF

* see paragraph 5.6.35

5.6.34 Details of the opening hours and access arrangements for each of these venues were given on the project website and advertised on the consultation invitation flyer.

5.6.35 Due to the COVID-19 pandemic and the consequent reduction in customers attending the venue, Walton Highway Village Club advised that its opening hours had been amended. The Applicant notified the host local authorities and displayed a poster in the window of the club from 8 July 2021 to inform any interested parties attending the venue outside the amended opening hours. A copy of this poster is presented in **Appendix V**. In addition, the project website was also updated to reflect the amended opening hours.

5.6.36 All documents published as part of the consultation were also made available for inspection on the project website, in line with changes to certain publicity requirements introduced by the Infrastructure Planning Regulations 2020.

Notification of Consultees

Section 42

5.6.37 Notification letters (see **Appendix H**) were sent to the prescribed consultees detailed in **Appendix R** on 23 June 2021. This included prescribed consultees, local authorities and PILs. The letter gave formal notification that the Stage 2 Statutory Consultation had commenced and provided recipients with an opportunity to review and comment on the consultation materials including the PEIR. It enclosed hard copies of the site location plan and the Section 48 notice and provided links to the project website where the consultation materials and feedback forms could be accessed.



5.6.38 Due to an administrative error with mail merged addresses on the envelopes, the Section 42 notices and accompanying information were re-issued on 30 June 2021 by special delivery mail and email to these consultees. Despite the administrative error, consultees still had 6 weeks to respond to the consultation, before the consultation end date of the 13 August 2021.

Section 44

5.6.39 Notification letters (see **Appendix H**) were sent to Persons with an Interest in Land (PILs) as defined under Section 44 of the Act on 23 June 2021

Section 46

5.6.40 In accordance with Section 46 of the Planning Act 2008, notification was issued by email to the SoS for BEIS (via PINS) on 14 June 2021. Hard copy templates of covering letters sent to Section 42 consultees, the site location plan and Section 48 notice were included with the notification. Links to the project website containing consultation materials and the feedback form were also included. The PINS confirmed receipt of the Section 46 notification on 8 July 2021 (see **Appendix CC**).

Section 47

5.6.41 At the start of the Stage 2 Statutory Consultation, an information flyer notifying consultees about the consultation was issued to all properties and businesses in Consultation Zone A. The flyer provided an overview of the consultation, details of the public exhibitions and explained where the project information could be viewed and how feedback could be provided.

Wider Stakeholders

5.6.42 Notification emails (see **Appendix H**) were sent to the non-statutory consultees detailed in **Appendix R** (including community groups, district and county councillors, Members of Parliament, and non-statutory Stakeholders) on 30 June 2021. The email notified consultees of the Stage 2 Statutory Consultation and enclosed the information flyer explaining more about the Proposed Development, where further information could be acquired, and how feedback could be submitted.

Advertising and publicity

Publication of notice of the SoCC

5.6.43 **Table 5.5 Publications containing notice of the SoCC** sets out the publications and dates for the notice publicising the availability of the SoCC for inspection, in accordance with Section 47(6)(a) of the Planning Act 2008. The notice provided details of the locations where the SoCC was available to view, the consultation events, the ways in which feedback could be provided and the deadline for receipt of feedback. Copies of the SoCC notices are presented in **Appendix F**.



Table 5.5 Publications containing notice of the SoCC

Publications	Publication Dates
Cambs Times	18 June 2021
Eastern Daily Press	14 June 2021
Fenland Citizen	16 June 2021
Lynn News	18 June 2021
Your Local Paper	18 June 2021

5.6.44 The SoCC was also published on the project website, from the 28 of June 2021, where it could be accessed free of charge. A screenshot of the webpage showing the published SoCC has been included alongside the rest of the project website in **Appendix P**.

Section 48 notices

5.6.45 Regulation 4(2) of the APFP Regulations requires the Applicant to publish a Section 48 notice for at least two successive weeks in one or more local newspapers circulating in the vicinity of the Proposed Development, once in a national newspaper, and once in the London Gazette. In accordance with this requirement, Section 48 notices were published in the local and national publications detailed in **Table 5.6 Publications containing the Section 48 notice** from the week commencing 14 June 2021. Copies of the Section 48 notices are presented in **Appendix I**.

5.6.46 The notice provided the matters required by regulation 4(3) of the APFP Regulations including details of the Proposed Development, how copies of consultation documents could be obtained, details of the Document Inspection Locations including opening hours, the ways in which feedback could be provided and the deadline for receipt of feedback. The notice also confirmed that the Proposed Development is classified as EIA development and that a PEIR was published as part of the consultation.

Table 5.6 Publications containing the Section 48 notice

Publications	Publication Dates
Cambs Times	18 June 2021 25 June 2021
Daily Mail (England & Wales and Scotland editions)	21 June 2021
Eastern Daily Press	14 June 2021 21 June 2021
Fenland Citizen	16 June 2021



Publications	Publication Dates
	23 June 2021
Lynn News	18 June 2021 25 June 2021
London Gazette	21 June 2021
Metro	21 June 2021
Your Local Paper	18 June 2021 25 June 2021

5.6.47 In addition, the Section 48 notice was sent to all ‘consultation bodies’ in accordance with Regulation 13 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (see **paragraphs 5.6.37 and 5.6.40**).

Wider advertising

5.6.48 The formal notices required under Sections 47 and 48 were supplemented by advertisements in the following local newspapers circulating across the consultation zone during the weeks commencing 28 June and 5 July 2021:

Table 5.7 Newspaper advertisement publication dates

Publication	Advertisement 1	Advertisement 2
Cambs Times	2 July 2021	9 July 2021
Eastern Daily Press	2 July 2021	9 July 2021
Fenland Citizen	30 June 2021	7 July 2021
Lynn News	2 July 2021	9 July 2021
Your Local Paper	2 July 2021	9 July 2021

5.6.49 These advertised the consultation dates, exhibition event dates and Document Inspection Locations and directed people to where they could find out more about the consultation (see **Appendix U**).

5.6.50 In addition, online advertisements (see **Appendix II**) were placed on the websites of the Fenland Citizen and Wisbech Standard for display during the consultation period.

5.6.51 A press release was issued to the following publications and organisations at the outset of consultation (25 June 2021):


Table 5.8 Press Release Circulation List

Recipients		
Archant News Desk	Eastern Daily Press	Materials Recycling World
BBC Look East	ENDS Waste & Bioenergy and Mineral & Waste Planning	Norfolk County Council
BBC Radio Cambridgeshire	Fenland Citizen	Peterborough Today
Borough Council of King's Lynn & West Norfolk	Fenland District Council	Resource Magazine
Cambridge News	ITV Anglia News	Steve Barclay MP
Cambridgeshire County Council	Johnny Mercer MP	Wisbech Standard
Cambs Times	Let's Recycle	Wisbech Town Council
Discovering Magazines	Lincolnshire Free Press and Spalding Guardian	

5.6.52 A copy of the press release is provided in **Appendix DD**.

5.6.53 News updates were also published on the project website at the start of the Stage 2 Statutory Consultation (25 June 2021) and following the close of the consultation period (23 August 2021).

Hard to reach groups

5.6.54 In addition to the methods outlined in preceding sections, to ensure that all Stakeholders were able to engage in and respond to the consultation, the Applicant offered a range of solutions for people requiring additional assistance. These included making the consultation documents available in large copy print, audio, or Braille on request. A translation service to provide documents in alternative languages was also available on request.

5.6.55 To support requests for hard copy documents and/or alternative document formats, the community contact point and Freepost address were available to facilitate requests throughout the period of the consultation.

5.6.56 A health and safety audit was undertaken of the exhibition venues to strike a suitable balance between accessibility of the buildings and proximity to the residents wishing to attend. All the exhibition locations selected were Disability Discrimination Act (DDA) compliant. Members of the project team were in attendance to facilitate access and assist the public.



6. Consultation under the EIA Regulations

6.1 Introduction

6.1.1 This chapter summarises the approach to EIA Scoping and production of the Preliminary Environmental Information Report (PEIR) to inform the ES in the context of demonstrating compliance with consultation requirements under the Infrastructure Planning (EIA) Regulations 2017 (the EIA Regulations).

6.2 Environmental Impact Assessment

EIA Scoping

6.2.1 As the Proposed Development falls within Schedule 1 of the EIA Regulations, it automatically requires an EIA. For this reason, no screening request was made to the SoS. Instead, the Applicant notified the SoS for BEIS on 18 May 2018 under Regulation 8(1)(b) of the EIA Regulations that it proposed to provide an ES in respect of the Proposed Development as it is 'EIA development' in accordance with Regulation 6(2)(a) of the EIA Regulations.

6.2.2 A Scoping Report for the Proposed Development was submitted to the Planning Inspectorate on behalf of the SoS on 3 December 2019. The Scoping Report presented the components of the Proposed Development and set out the approach to defining the Study Area, baseline data gathering and methodologies for assessment of the likely significant effects recognising these were not dependent on the final choice of precise location or detailed design of the components. The opinion of the SoS was sought specifically on:

- The environmental topics that should be included in the EIA
- The relevant components of the Proposed Development and the resultant likely significant effects
- Those effects not likely to be significant that did not need to be considered further
- The approach to setting the Study Areas for each topic
- The data that had been gathered (and would be gathered)
- The assessment methods that would be used to determine likely significant effects
- The approach to determining the environmental measures that could be incorporated into the Proposed Development to avoid, prevent, reduce or, if necessary, offset significant effects.

6.2.3 In preparing the EIA Scoping Report, regard was had to PINS Advice Note Seven: EIA: PEI, Screening and Scoping.



- 6.2.4 A Scoping Opinion was subsequently adopted by the SoS on 13 January 2020, and the responses to the Scoping Report from consultation bodies were also provided.
- 6.2.5 The consultation bodies consulted on the scope of the EIA are listed in Appendix 1 of the Scoping Opinion. This includes prescribed consultees and Section 43 consultees. PINS did not identify any non-prescribed consultation bodies.
- 6.2.6 The Scoping Opinion and the consultation body responses were used to inform assessment work and the iterative development of the Proposed Development design presented in the PEIR and the resultant ES.
- 6.2.7 The Scoping Report presented the land considered at that time likely to be required for the Proposed Development. As the design developed through the Applicant's scheme development process, and as a result of ongoing engagement, this area was modified, resulting in changes to the land required. The way this evolved since scoping was described in the PEIR; **Chapter 2: Alternatives and Chapter 3: Description of the Proposed Development**. At this stage, the Proposed Development remained materially the same as that described in the Scoping Report with regard to the project components although and as referred to above, the areas of land identified for the potential Grid Connection had been refined with, for example the potential option for a connection to a 400kV overhead line abandoned. The PEIR red line boundary did not extend beyond that used at scoping and the Applicant was of the opinion that the Scoping Opinion remained applicable.
- 6.2.8 In accordance with Regulation 11(1) PINS provided a list (dated January 2020) of the bodies notified about the application, and of the duty imposed on these bodies to make information available to the Applicant. No Regulation 11(1)(c) bodies were identified.

Preliminary Environmental Information Report

- 6.2.9 The requirement to consult on preliminary environmental information is set out in Regulation 12 (1) (b) of the EIA Regulations. Preliminary environmental information is defined in the EIA Regulations as:
- 'information referred to in Part 1 of Schedule 4 (information for inclusion in environmental statements); which,
 - (a) has been compiled by the applicant; and
 - (b) is reasonably required to assess the environmental effects of the development (and of any associated development).
- 6.2.10 The SoCC prepared under Section 47 of the Planning Act 2008 set out how the PEIR was to be publicised and consulted upon. This included confirmation of the relevant consultation bodies required to be notified of the statutory consultation in accordance with EIA Regulation 13. The statutory consultation exercise was carried out in accordance with the SoCC (see **Appendix M**).
- 6.2.11 The PEIR published as part of the Stage 2 Statutory Consultation was the written output of the EIA undertaken to date for the Proposed Development. The PEIR was designed to accord with the minimum requirements for an ES as set out in



Regulation 14 and Schedule 4 of the EIA Regulations as far as possible on the basis of known information. **Table 1.2 Schedule 4 requirements** of the PEIR signposted to where the information provided in the PEIR was pursuant to Regulation 14 and Schedule 4 of the EIA Regulations. In preparing the PEIR for consultation, regard was had to PINS Advice Note Seven: EIA: PEI, Screening and Scoping.

6.2.12 The findings presented in the PEIR were based on a preliminary assessment and reflected the design process at that stage and understanding of baseline conditions, allowing for conclusions as to the likely significant effects to be drawn. Although preliminary, the findings of the assessment set out within the report allowed an informed view to be developed of the Proposed Development being promoted, the assessment approach that had been undertaken, and drew preliminary conclusions on the likely significant effects and the environmental measures proposed.

6.2.13 Where the design was still evolving or further information on baseline conditions was still to be obtained, a precautionary approach was applied to ensure a reasonable worst case was assessed in the PEIR. The PEIR presented a level of preliminary assessment appropriate to support the Stage 2 Statutory Consultation and for consultees to develop an informed view of likely significant effects and to inform their consultation responses on the Proposed Development. This enabled both the design of the Proposed Development and the EIA to take into consideration any comments received subsequent to the close of consultation.

6.2.14 Responses to the Scoping Opinion comments, detailing how they were addressed within the PEIR were set out in each of the environmental topic chapters.

6.3 Habitats Regulations Assessment

6.3.1 Under the Conservation of Habitats and Species Regulations 2017 (the Habitats Regulations 2017), Competent Authorities have a duty to have regard to the Habitats Directive and the Birds Directive in the exercise of any of their functions. This includes undertaking an assessment to determine the likely significant effects of the Proposed Development on sites protected under these Directives.

6.3.2 In undertaking an appropriate assessment to determine whether or not there are likely significant effects on a European site the SoS must consult the appropriate statutory nature conservation body (Natural England) and have regard to any representations that it makes. Natural England is also commonly consulted in the process of screening projects to establish whether an appropriate assessment is required. Further, Regulation 63(4) directs the competent authority to consult the general public where appropriate.

6.3.3 Although there is no statutory requirement under the Habitat Regulations for an applicant to undertake consultation to support this process, there is a legal requirement to provide the information necessary to enable the Competent Authority (the SoS in their role as decision maker) to comply with their duties under Regulation 63 of the Habitats Regulations 2017.

6.3.4 To support this process, information to support the Habitats Regulations Assessment (HRA) process collated at the point of the Stage 2 Statutory



Consultation was published with the PEIR comprising a preliminary draft of the HRA screening report which had been provided previously to Natural England and the host local authorities in October and November 2020. A note of clarification was provided to explain the document's context.

6.3.5 In preparing the preliminary HRA screening report for consultation, regard was given to Planning Inspectorate Advice Note Ten: Habitat Regulations Assessment relevant to NSIPs.



7. Regard to feedback to the Statutory Consultation

7.1 Introduction

7.1.1 This Section sets out details of the feedback mechanisms available for consultees to provide representations about the Proposed Development. It also provides details on the number of representations received and explains the process and procedures employed to analyse consultation feedback.

7.2 How consultees could respond

7.2.1 The following arrangements were made to facilitate consultation feedback:

- Online feedback through the project website – An electronic feedback form was available on the project website. This could either be completed and submitted online or downloaded from the project website and posted via the Freepost address;
- Email feedback – Email feedback could be submitted via the project email address;
- Hard copy feedback forms – Hard copy feedback forms were available at the public exhibitions, all Document Inspection Locations and on request via the community contact point; and
- Hard copy by post – Hard copy responses could be submitted in writing to the Freepost address at ‘Freepost MVV’.

7.3 Feedback received

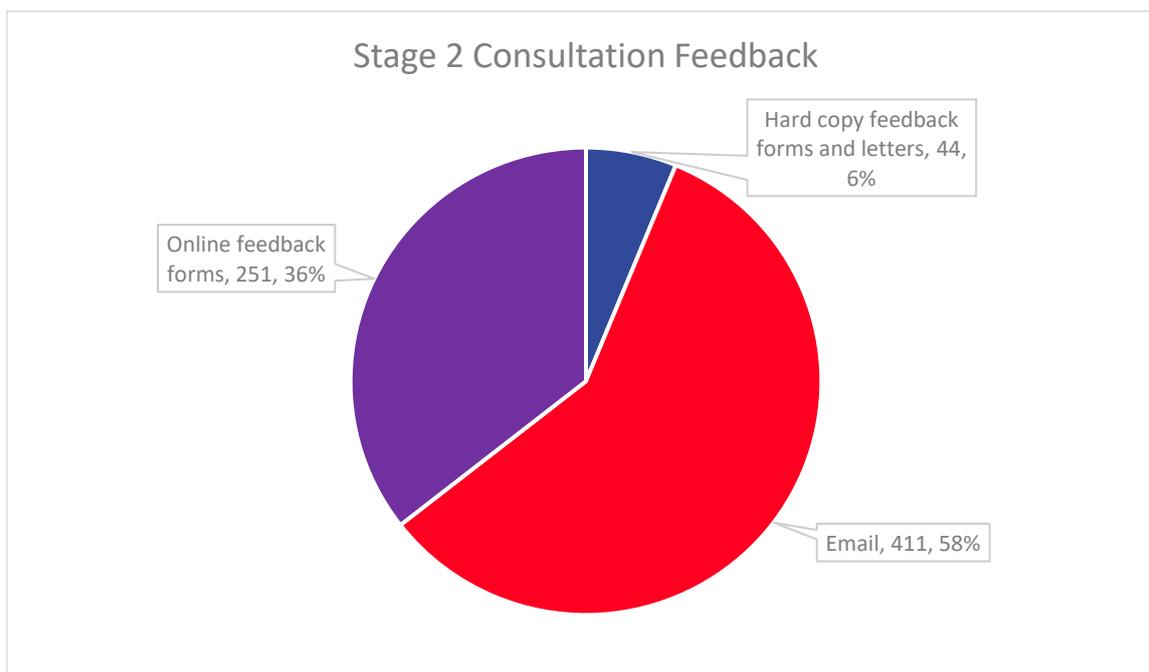
7.3.1 A total of 706 pieces of feedback were received in response to the Stage 2 Statutory Consultation.

7.3.2 Representations were received from local authorities, national and regional organisations, persons with an interest in land, and the local community. The feedback received comprised:

- Hard copy feedback forms and letters – 44;
- Email – 411; and
- Online feedback forms – 251.



Figure 7.1 Feedback received at Stage 2 Statutory Consultation by type



7.3.3 A late response was received from NCC on 20 May 2022, following the close of the consultation period, outlining the Council's objection to the Proposed Development in a motion passed at Full Council.

Closed question responses

7.3.4 As part of the Stage 2 Statutory Consultation, consultees were asked the following closed question (Question 6) within the online and hard copy feedback form (see **Appendix BB**):

- ▶ 'We are proud to be part of the communities in which we operate. On other projects, we have provided a number of community and environmental benefits and we are keen to understand which benefits you think would be best suited to your area. Of the benefits listed below, please tick up to 5 benefits that are most important to you'

7.3.5 In response to question 6, respondents were asked to select up to five options from the following list of community and environmental benefits provided:

- Employment of local people
- Use of local suppliers
- A visitor area for schools and community workshops at the facility
- Hosting site visits for schools and local community groups
- Support for apprenticeships, internships and work experience
- Skills development for staff and the wider community
- Support to/working with local community groups



- A local liaison group
- Biodiversity and ecological enhancement
- Waste awareness and education

7.3.6 A free-text box was also provided for consultees to provide suggestions for other ideas or initiatives they considered could benefit the local community. Free-text comments to this question are considered and reported on a topic-basis within **Sections 8 to 19** of this Report, in line with the process detailed below in **Section 7.4**.

7.3.7 A total of 292 selections were made by consultees in response to this question. **Table 7.1** below provides the frequency of which the community and environmental benefits were selected by respondents, in the order they were presented in the question.

Table 7.1 Selection of benefits in response to Question 6

Benefits Prompted	Number of selections
Employment of local people	47
Use of Local Suppliers	42
A visitor area for schools and local community groups	12
Hosting site visits for schools and local community groups	11
Support for apprentices, internships and work experience	38
Skills development for staff and the wider community	25
Support to/working with local community groups	23
A local liaison group	22
Biodiversity and ecological enhancement	36
Waste awareness and education	36
Total selections made	292

7.3.8 The three community and environmental benefits selected most often by consultees related to supporting local employment and businesses. These comprised

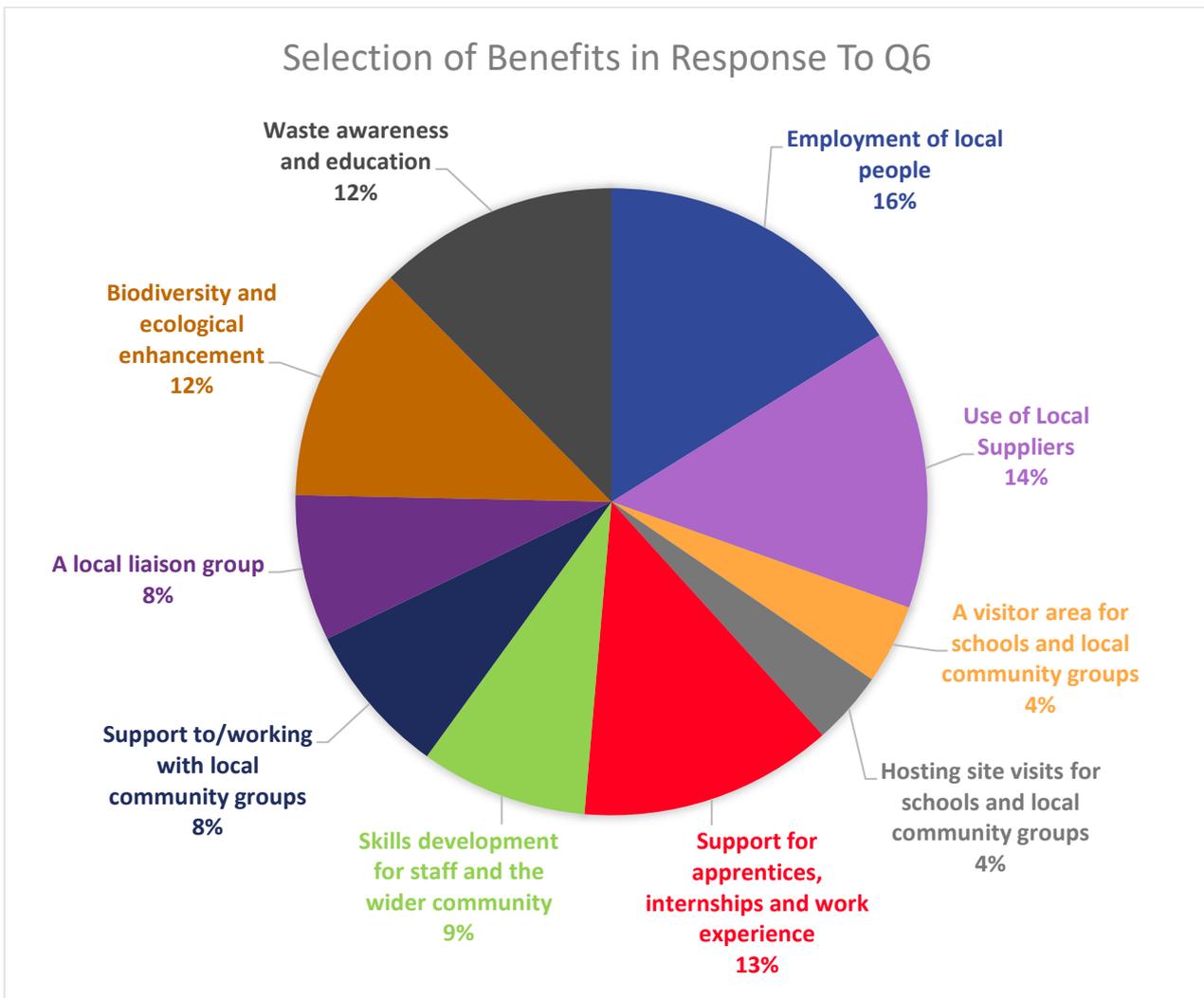


‘employment of local people’, ‘use of local suppliers’, and ‘support for apprentices, internships and work experience’, in order of popularity. Further benefits selected often by respondents included ‘biodiversity and ecological enhancement’ and ‘waste awareness and education’.

7.3.9 The community and environmental benefits selected least often by consultees were ‘hosting site visits for schools and local community groups’ and ‘a visitor area for schools and local community groups’.

7.3.10 **Figure 7.2** below presents a visual representation of the community and environmental benefits selected by consultees in response to Question 6, displaying percentages of the frequency at which benefits were selected.

Figure 7.2 Selected benefits in response to Q6



7.4 Data processing and analysis

7.4.1 All representations received were logged with a unique identification number before being reviewed and analysed.



- 7.4.2 A coding framework was created to provide a list of themes and topics raised by the consultation feedback. The coding framework was applied by analysts through a collaborative software platform to all feedback received. This enabled the capture and organisation of the issues raised in a systematic way and assisted in interrogation and analysis of the responses. A copy of the coding framework can be found in **Appendix EE**.
- 7.4.3 Once the coding framework had been applied to the feedback received, similar themes were grouped together and organised into categories. Summaries of the feedback by theme and topic were considered by the project team together with the full consultation representation. This enabled the team to consider the feedback and take it into account in the design, assessment, and evaluation processes.
- 7.4.4 All personal data received as part of the consultation was stored and protected in accordance with relevant data protection requirements as set out in the GDPR.
- 7.4.5 A record of the collated feedback received is provided in **Sections 8 to 19** of this Report. The material has been divided into 11 topics, with a section per topic that summarises the issues raised by consultees, grouped by consultee type, and presented by theme. These summaries provide a clear and objective precis of the views expressed by consultees and have been broken down using sub-headings. Where sub-headings are not presented this is because no feedback was received from this Stakeholder group on this topic.

7.5 Quality Assurance

- 7.5.1 Quality assurance measures were put in place at different stages of the data entry and analysis process to ensure that representations were accurately captured and analysed. This involved a senior member of staff reviewing the data entry and analysis undertaken.

7.6 The Applicant's responses

- 7.6.1 Following identification and categorisation of the feedback, the Applicant analysed it as part of its ongoing design, assessment, and evaluation processes for the Proposed Development.
- 7.6.2 A summary of how the Applicant has had regard to the consultation feedback is provided in each of the topic **Sections (8 to 19)** of this Report. This response follows the summary of the consultation feedback received.



8. Air Quality

8.1 Introduction

8.1.1 As part of the Stage 2 Statutory Consultation, the Applicant sought feedback in relation to the design of the Proposed Development, its impacts and the mitigation measures proposed to reduce the impacts of the Proposed Development on the local environment and community.

8.1.2 This chapter provides a summary of the relevant consultation feedback received from prescribed consultees, local authorities, members of the public and wider Stakeholders grouped under the following headings:

- Assessment methodology and scope;
- Local/regional air quality;
- Operational emissions;
- Transport emissions;
- Mitigation; and
- Monitoring, reporting and enforcement.

8.1.3 Where comments have not been received within consultee groupings under the headings above, these have been removed to reflect this. The issues raised by respondents have also been grouped in table form at **Appendix JJ** (Table 1.1), which includes the Applicant's response.

8.2 Section 42 Consultees

Local Authorities

Assessment methodology and scope

8.2.1 CCC made a number of detailed comments in relation to the Preliminary Environmental Information Report (PEIR). The Council said that:

- The methodology used in the PEIR was in general acceptable, but a number of clarifications and recommendations should be taken into consideration in the ES. These included providing clarity on how the adjustment factor of 1.50 was derived, justification for the Air Quality Assessment Levels in tables 8.28 and 8.29, clarification on whether the nitrogen deposition rates in Table 8.30 and 8.31 include ammonia and if acid deposition includes hydrogen chloride contributions.
- The approach in air quality assessment used for Honington House Farm County Wildlife Site (CWS) was appropriate if traffic flows adjacent to it also fall below relevant criteria.



- There were discrepancies between the results presented in Table 8.27, Appendix 8C and the Institute of Air Quality Management (IAQM) guidance referenced in Table 8.16. It also said that it was not clear from Table 8.27 if the Predicted Environmental Concentrations include or exclude the baseline emissions from road traffic.
- Table 8.4 references the 2014 version of the IAQM Construction Dust Guidance rather than the updated 2016 version.
- The NO₂ data from Table 8.6 should be updated to account for normal conditions as the monitoring was undertaken during periods of COVID-19 restrictions.
- The air quality modelling was incomplete and that a number of errors were identified in the model inputs and results. It expressed support for the inclusion of River Nene CWS, and the Ouse Washes and Nene Washes Special Area of Conservation (SAC) and Ramsar sites as part of the modelled Receptors.
- The road traffic model in the ES should include all roads within 200 meters of the Receptors to ensure that the predicted concentrations are representative of the actual conditions for the Receptors. It also said that the traffic model should ensure that additional Heavy Duty Vehicles (HDVs) are modelled as Heavy Goods Vehicles (HGVs) as HGVs transporting waste have different emission characteristics than buses.
- It disagreed with the assessment of 'no' likely significant effects presented in Table 8.26. CCC considered that the scheme will result in an increase in daily Nitrogen Oxides (NO_x) levels on internationally designated Receptors at this stage. They suggested that the PEIR should include the results of the Air Quality Report.
- The impacts of any diesel generator plants should be considered.
- The three pollutants nitrogen dioxide (NO₂), sulphur dioxide (SO₂) and particulate matter that is 10 micrometres or smaller (PM₁₀) in Figure 8.3 were not labelled, making it difficult to distinguish between the generation of the different pollutants within the Air Quality Management Area.
- More information about the chimney height should be provided in the ES as graphics 8B.1 and 8B.2 in the PEIR were unclear about how the specific values have been derived.
- The boundaries for the designated ecological sites were not shown clearly in Chapter 8 of the PEIR, and as such it was difficult to understand whether the ecological Receptors are placed in the worst-case locations.
- In-combination, air pollution impacts with other plans and projects should be considered. It said that the long-term average predictions should be below 1% and short-term averages should be below 10% of the critical load of both nitrogen and acid deposition.
- An assessment of the air quality impacts on international and local wildlife Receptors should be provided to clarify which international sites would be affected by the Proposed Development. It disputed the conclusion of the



assessment that the impact of elevated air pollution will be negligible to international and local wildlife sites.

8.2.2 KLWN requested justification as to why the two Air Quality Management Areas (AQMA) in King's Lynn were not considered in the air dispersion modelling in the PIER. KLWN also expressed concern that the assessment of air quality impacts on Clenchwarton were found to be insignificant, despite local health risks from Sahara sand particles.

8.2.3 It proposed that an assessment be conducted for the chimney emissions in the event of mechanical or filter failure. It also requested clarification on the rationale for the 15km assessment radius and questioned if it had taken the local geography and topography of the area into account. KLWN considered that impacts could be experienced further afield than what had been modelled due to the low-lying and open nature of the area, and that a cumulative air quality assessment should be conducted.

Local/regional air quality

8.2.4 CCC expressed general concern about the impact of construction and resulting emissions on local air quality.

8.2.5 Huntingdonshire District Council said that it was satisfied that the Proposed Development would not lead to significant adverse impacts or any national air quality breaches in Huntingdonshire.

8.2.6 KLWN expressed general concern about the location of the Proposed Development and its effect on air quality and the proximity to the local residents.

Operational emissions

8.2.7 Fenland District Council (FDC) expressed concern about the potential for dust and odour emissions from the Proposed Development in addition to the pollutants that will be emitted into the surrounding environment.

Transport emissions

8.2.8 CCC and FDC raised concern about the impact on air quality from increased traffic movements. In this regard, concern for the health and wellbeing of the local community, especially young people, was also expressed.

Mitigation

8.2.9 FDC suggested that the Odour Management Plan should include details of mitigation measures during both normal and abnormal operations and how complaints will be recorded and investigated. The Council also suggested that it should include confirmation that all vehicles delivering and removing materials should be sheeted at all times.



Monitoring, reporting and enforcement

- 8.2.10 CCC suggested that the ES should include monitoring sites alongside the already existing monitoring network operated by Fenland District Council. It suggested that air quality should be monitored both prior to and during construction and operation and that where emissions exceed a pre-agreed level, activities should stop until it has been remedied.
- 8.2.11 The Council also proposed a review of the selected Receptors prior to the completion of the ES to ensure that it includes any new installed or proposed Receptors. It also requested an independent review of the Air Quality and Noise Impact Assessment.
- 8.2.12 KLWN expressed concern that some particulates emitted from the Proposed Development will not be captured nor monitored.

Prescribed Consultees

Assessment methodology and scope

- 8.2.13 Wisbech Town Council said that the baseline data used in the PEIR to determine the likely significant effects in relation to air quality was not clear. It noted that data collection was still ongoing for several locations. The Council also expressed concern that traffic baseline data is lacking which is an issue as it is affecting air quality.

Local/regional air quality

- 8.2.14 Natural England said that the air quality information in Chapter 8 of the PEIR, Table 8.28 and Appendix 8B provided sufficient information about the distances and predicted long term average levels being less than 1% of the critical load. They considered it unlikely that the Proposed Development would have a significant effect on the Nene Washes and Ouse Washes SPA (Special Protection Area), SAC and Ramsar.
- 8.2.15 Walsoken Parish Council raised concern about potential fallout and acid rain on residential and agricultural land, highlighting that they are located downwind of the Proposed Development.
- 8.2.16 Wisbech Town Council raised concern about the proposal's effects on air quality in Wisbech, noting that the air quality in Wisbech is already poor.

Operational emissions

- 8.2.17 Wisbech Town Council said that odour was not mentioned in the PEIR NTS (Non-Technical Summary) and that it cannot be concluded that significant odour impacts would not occur for the residents of Wisbech.



Transport emissions

- 8.2.18 Wisbech Town Council raised concern about the impact on air quality from increased traffic movements. In this regard, concern for the health and wellbeing of the local community, especially young people, was also expressed.

Mitigation

- 8.2.19 Public Health England (PHE) expressed support for the Applicant's commitment to mitigate exposure to air pollutants to as low as possible below air quality standards in the Construction Management Plan.

Persons with an interest in land (PILs)

Local/regional air quality

- 8.2.20 A PIL expressed concern about the proximity of the Proposed Development to both residential areas and local schools due its effect on air quality. A further concern was raised about the air quality effects on staff at Crown's factory, where the fresh air intake and extract fans do not have filter elements.

8.3 Section 47 Consultees

Members of the public

Assessment methodology and scope

- 8.3.1 A respondent requested a comparison of the percentage of emissions that will be generated from the EfW CHP Facility with the existing conditions in the local area. Another member of the public said that dioxins emissions should be quantified.
- 8.3.2 A respondent also raised concern that the assessment of air quality is based on current emissions which mostly comprise vehicle emissions in the area.

Local/regional air quality

- 8.3.3 Members of the public expressed concerns about the proximity of the Proposed Development to Wisbech, the potential effects on air quality and the impacts of emissions, particulate, and nitrogen deposition on the local area. These concerns were often linked to objections to the proposals due to the potential effects on residential areas and local schools or to concerns that odour, toxins and particulate emissions from the development cannot be mitigated.
- 8.3.4 A respondent suggested that emissions from the Proposed Development may deter the use of bicycles as a primary mode of transport in the local area. Another requested confirmation that the facility would not emit any harmful particulates.



Operational emissions

- 8.3.5 Members of the public expressed concern that the Proposed Development will not operate within set emission limits, and as such may affect local air quality. A respondent raised particular concern about the use of the “Dilute and Disperse” model, suggesting that it would spread pollution even further.

Transport emissions

- 8.3.6 Several members of the public raised general concern that the increased level of traffic associated with the construction and operation of the Proposed Development would affect the health and wellbeing of the local community, especially those with asthma and young people.

Mitigation

- 8.3.7 Several members of the public said that pollutants, such as PCP (Pentachlorophenol), cannot be mitigated as there are no safe levels for them, which has been noted by the WHO (World Health Organisation).

Businesses and Community Groups

Local/regional air quality

- 8.3.8 Wisbech, March and District Trades Union Council expressed concern about the impacts of the EfW CHP Facility on air quality in the local area.

Operational emissions

- 8.3.9 Campaign to Protect Rural England (CPRE) expressed concerns regarding the emission of cadmium and nickel. It also disputed the conclusion in Chapter 8 of the PEIR that the concentration at human receptors is not considered to be significant as there is currently not an identified threshold below which PM_{2.5} does not pose a risk to human health. It also said that the deposition and build up in soil of fallouts from the Proposed Development and the deposition onto the leaves of crops has not been considered.

Transport emissions

- 8.3.10 The Fascinating Fens and Wisbech, March and District Trades Union Council raised concerns about the impact of increased traffic on air quality and its effects on the health and wellbeing of the local community.

Monitoring, reporting and enforcement

- 8.3.11 CPRE said that greater consideration should be given to the deposition and the concentration of airborne emissions of toxic metals and polycyclic aromatic hydrocarbons in the development of the Proposed Development.



Wider Stakeholders

Assessment methodology and scope

- 8.3.12 Steve Barclay MP said that full-time air quality monitoring was only being conducted from June 2021 and the lack of location-specific weather data meant a reliance on modelled data. He said that air quality monitoring should have been continuously measured and requested information about when the results of the modelling, incorporating the ongoing air quality modelling, would be made available. He requested clarity as to why meteorological equipment was not deployed to ensure that the air quality modelling was based on measured data within the local area. He also suggested that a graphical depiction of the plume model should be provided.

Local/ regional air quality

- 8.3.13 Cambridge Friends of the Earth shared concern about the generation and dispersal of dioxins and other compounds being emitted from the Proposed Development.
- 8.3.14 South Wootton Parish Council raised concern about potential fallout and acid rain on residential and agricultural land.

Monitoring, reporting and enforcement

- 8.3.15 Cambridge Friends of the Earth said that potential contamination spikes from the operation of the EfW CHP Facility will not be caught and managed as not all of the chemicals emitted from the combustion process are measured continuously and others are only spot checked. It also raised concern about the area of Wisbech being listed as a zone exceeding the target values for; arsenic, cadmium, nickel, or benzo(a)pyrene.

Operational emissions

- 8.3.16 Cambridge Friends of the Earth said that the Proposed Development would emit Cadmium and other toxic heavy metals resulting in the potential for the accumulation of harmful heavy metals in the environment. It highlighted research¹⁰ stating that incineration was one of the most important anthropogenic sources of heavy metals and one of the main sources of trace elements within the atmosphere.
- 8.3.17 The group also expressed concern that the EfW CHP Facility will not work with high enough temperatures to combust the feedstock without producing dioxins among other by-products.
- 8.3.18 Fenland and West Norfolk Friends of the Earth raised concern about the emissions associated with the construction and operation of the Proposed Development as the population in the area has a high level of asthma and Chronic Obstructive Pulmonary Disease (COPD) levels compared to the rest of Cambridgeshire.

¹⁰ Niragu J.O. (1990) Global metal pollution poisoning the biosphere? Environment. Vol.32 pp.7 - 33



- 8.3.19 Steve Barclay MP suggested that the predicted emissions reductions as a result of the EfW CHP Facility displacing other forms of energy generation are significantly lower than the predicted reductions being presented in the PEIR.

Transport emissions

- 8.3.20 Cambridge Friends of the Earth, and Fenland and West Norfolk Friends of the Earth, raised concerns about the impact of increased traffic on air quality and its effects on the health and wellbeing of the local community. Cambridge Friends of the Earth more specifically said that the increased number of HGVs will have an impact on the health and wellbeing on local residents.

8.4 How feedback has influenced the DCO application

- 8.4.1 As outlined above, a range of comments were received from consultees in relation to air quality. A summary of how feedback has been taken into account in the preparation of the DCO application is provided below with details of the feedback received and the Applicant's response presented in tabular format in **Appendix JJ** (Table 1.1).

Assessment methodology and scope

- 8.4.2 As part of the Stage 2 Statutory Consultation the Applicant presented the preliminary findings of the air quality assessment in Chapter 8 of the PEIR. In response to feedback received, as well as ongoing engagement with Stakeholders, the Applicant has reviewed its proposals and updated its assessments accordingly. This includes providing additional information, addressing discrepancies noted by consultees and reviewing the assessment of likely significant effects. The current baseline data is also included in the ES within **Chapter 8: Air Quality (Volume 6.2)**, informed by publicly available data and site specific monitoring.
- 8.4.3 The air quality assessment presented in **Chapter 8: Air Quality (Volume 6.2)** of the ES has been undertaken in accordance with EA guidance in relation to the definition of the assessment area. The assessment also now draws on the air quality modelling and predicts impacts from both traffic and chimney emissions, using the IAQM criteria as the basis for the assessment of likely significant effects.
- 8.4.4 Within the ES the traffic data has been updated to consider traffic counts undertaken in 2021. This has been agreed with National Highways and the local highways authorities and the updated information has been used to inform the air quality assessment presented within the ES at **Chapter 8: Air Quality (Volume 6.2)**.
- 8.4.5 The PEIR presented a preliminary assessment of the Proposed Development in respect of air quality on international and local wildlife Receptors. Following the Stage 2 Statutory Consultation, this assessment has been updated and finalised and is provided within **Chapter 11: Biodiversity (Volume 6.2)**.
- 8.4.6 In addition, **Chapter 18: Cumulative Effects Assessment (Volume 6.2)** concludes that the cumulative effects of the Proposed Development on these sites would not be significant.



Local/regional air quality

- 8.4.7 The Applicant recognises that local residents have expressed concerns about the effect of the Proposed Development on air quality and local residents. As part of the EIA detailed dispersion modelling has been undertaken to predict potential impacts on human and ecological Receptors. This also considers the potential for nitrogen and acid deposition for emissions from traffic and chimneys. The model included as Receptors, local schools and residential properties to ensure any potential impacts were identified. The assessment undertaken also considers air quality objectives for a series of pollutants including metals and particulate matter (PM_{2.5}), set for the protection of human health.
- 8.4.8 The findings of the assessment are presented in ES **Chapter 8: Air Quality (Volume 6.2)** which concludes that the impacts on air quality and local residents will not be significant.

Operational emissions

- 8.4.9 As part of the air quality assessment presented in **Chapter 8: Air Quality (Volume 6.2)** of the ES, the potential for dust and odour emissions from the Proposed Development has been considered. Detailed dispersion modelling has also been undertaken, including traffic modelling, and based on Emission Limit Values (ELVs) included in the Environmental Permitting Regulations. As part of the Environmental Permit (EP) application for the EfW CHP Facility an Odour Management Plan will be provided. The permitting regulations also specify that monitoring of operational emissions using a Continuous Emissions Monitoring Systems (CEMS) will be required to ensure compliance with the ELVs set in the EP.

Transport emissions

- 8.4.10 The traffic data used in the assessment presented at the Stage 2 Statutory Consultation in the PEIR has been updated and is based on traffic counts undertaken in 2021. This data has been agreed with relevant highway authorities. The findings of the assessment in relation to air quality from increased traffic movements is presented in ES **Chapter 8: Air Quality (Volume 6.2)** which identifies that potential effects are not significant.

Mitigation

- 8.4.11 As part of the EP application for the EfW CHP Facility, an Odour Management Plan will be produced. In line with suggestions received during the Stage 2 Statutory Consultation this will include confirmation that all vehicles delivering and removing materials should be sheeted at all times. Other suggestions received on information to be included within the Odour Management Plan about mitigation measures during both normal and abnormal operations and how complaints will be recorded and investigated will be considered as part of the permitting process.



Monitoring, reporting and enforcement

- 8.4.12 During the Stage 2 Statutory Consultation comments were received which highlighted that greater consideration should be given to the deposition and the concentration of airborne emissions of toxic metals and polycyclic aromatic hydrocarbons. The Applicant can confirm that nitrogen and acid deposition, metal deposition and airborne emissions of metals and PAHs have been considered and assessed as part of the air quality assessment presented in **Chapter 8: Air Quality (Volume 6.2)** of the ES.



9. Climate Change

9.1 Introduction

9.1.1 As part of the Stage 2 Statutory Consultation, the Applicant sought feedback in relation to the design of the Proposed Development, its impacts and the mitigation measures proposed to reduce the impacts of the Proposed Development on the local environment and community.

9.1.2 This chapter provides a summary of the relevant consultation feedback received from prescribed consultees, local authorities, members of the public and wider Stakeholders in relation to climate change grouped under the following headings:

- Assessment methodology and scope;
- Climate change impacts;
- Operational carbon emissions;
- National and international carbon emissions targets;
- Mitigation; and
- Monitoring, reporting and enforcement.

9.1.3 Where comments have not been received under the headings above, the headings have been removed to reflect this. The issues raised by respondents have also been grouped in table form at **Appendix JJ** (Table 2.1), which includes the Applicant's response.

9.2 Section 42 Consultees

Local Authorities

Assessment methodology and scope

9.2.1 CCC expressed concern about the various climate change scenarios contained within the Preliminary Environmental Information Report (PEIR). The County Council said that a binary choice between landfill or incineration was not realistic in terms of waste management processes or spatial scope. It also said that it does not allow for comparison of GHG emissions with actual waste flows and current practices with and without energy recovery.

9.2.2 CCC made a number of detailed comments in relation to the PEIR and supporting materials. The Council said that:

- The DWFAA should provide greater evidence/justification for the two-hour journey time. It identified an inconsistency in how distances are considered within the supporting information and recommended that a detailed explanation is provided for how the distance of 48.9km had been derived.



- The Study Area used within the DWFAA was oversized and suggested that the following areas be excluded:
 - ▶ Central Bedfordshire,
 - ▶ Coventry,
 - ▶ Essex,
 - ▶ Hertfordshire,
 - ▶ Luton,
 - ▶ Milton Keynes,
 - ▶ North East Lincolnshire,
 - ▶ North Lincolnshire,
 - ▶ Nottingham City,
 - ▶ Nottinghamshire,
 - ▶ Suffolk and
 - ▶ Warwickshire.
- Table 14.8 within Chapter 14 of the PEIR needs to be updated to reflect 2021 datasets and the ES should use the factor updates found in the BEIS GHG reporting: conversion factors 2021.
- The approach adopted in Chapter 14 of the PEIR does not account for future changes in the quantities and types of waste from policy drivers and actions already undertaken. It raised concerns that the same quantity and composition of waste will be incinerated or landfilled, that the national energy mix remains unaltered, and that energy produced will always displace an equivalent quantity of fossil fuel.
- Section 14.6 in Chapter 14 of the PEIR should make clear that the scope includes the full life cycle of the Proposed Development as described in Section 14.8.
- Reference to incinerator bottom ash (IBA) sales to market in PEIR Chapter 14 should be clarified regarding the type of emissions related to this activity that are included in the scope of assessment.
- The description of the future baseline scenario in the 'Likely significant effects' column of Table 14.10 in Chapter 14 of the PEIR should be expanded. It said that waste sent to landfill is not a continuation of the status quo but accounts for policy drivers reducing the use of landfill over the temporal scope of the assessment.
- An accurate and clear description of what constitutes the 'with Proposed Development' scenario should be provided.



- Table 14.17 in Chapter 14 of the PEIR was considered flawed as a negligible change between the 'with Proposed Development' and 'without Proposed Development' scenarios does not mean those changes are net zero. It said that this table should clearly explain what constitutes 'material' in relation to significance criteria, recommending a qualitative evaluation of what constitutes 'material'.
- The grading used within Table 14.17 in Chapter 14 of the PEIR should be amended to show the significance parameters as 'averse', 'negligible' and 'beneficial'.
- The percentage of segregated waste collections provided in Table 14.22 in Chapter 14 of the PEIR appear greater than data showing that segregated waste collections reduce the percentage of organic waste in the residual waste stream by half or more.
- Relevant supporting worksheets should be provided in the ES showing the derivation of tabulated data in relation to annual GHG emissions of landfill with electricity generation using landfill gas (LFG).
- The consideration of UK-wide carbon budgets within the PEIR is inappropriate as any development would appear insignificant in comparison to such a metric. The Council also suggested that any assessment methodology should include consideration of specific carbon trajectories for the waste, and materials and construction sectors from the Sixth Carbon Budget.
- The preliminary assessment of climate effects did not include both tail pipe emissions and emissions associated with the production/refining of diesel fuel for construction vehicle emissions.
- The data gathering methodology Study Area for emissions should be expanded to cover the former East of England planning region.
- The climate assessment should reflect the transport efficiency improvements relating to heavy goods vehicles (HGVs) that are likely to occur in the future. The Council further stated that the sensitivity analysis of changing waste composition on GHG emissions should take account of local findings.

9.2.3 KLWN also expressed concern about the various climate change scenarios contained within the PEIR. It stated that further explanation is required regarding the 'reasonable worst-case scenario'. KLWN also said that methane generated by landfilling or by mechanical biological treatment has electricity generation potential which should be considered alongside other baselines/predictions.

9.2.4 KLWN made a number of detailed comments in relation to the PEIR. These included:

- The approach to the consideration of effects generated from transport emissions should consider whether by-products from incineration (bottom ash) might need to be transported out of the country;
- Information regarding the management of bottom ash should include all transportation related trips the Proposed Development would create;



- The traffic carbon assessment should consider all traffic related trips the Proposed Development would create, including those for bottom ash;
- Further information should be provided to better explain how the Proposed Development calculates avoided emissions; and
- The PEIR should clarify whether the Proposed Development would have a high (beneficial) significant effect in terms of GHG emissions or would have a low (beneficial) significant impact.

Climate Change impacts

- 9.2.5 KLWN expressed concern about the potential for the Proposed Development to produce 24,950,760 tonnes of CO₂ during its 40-year lifecycle and its contribution to climate change. It highlighted that the UK Without Incineration Network (UKWIN) analysis of landfilling vs incineration data identified that the incineration of a tonne of waste creates considerably more GHG emissions than landfilling a tonne of waste, despite the project documents stating the opposite.
- 9.2.6 KLWN said that the Proposed Development would likely encourage the creation of fossil fuel related products to supply the Proposed Development. It suggested that incinerator technology will soon be redundant, resulting in the considerable emission of GHGs for no reason, and advised that waste is better managed through the principles of 'reduce, reuse, and recycle'.

Operational carbon emissions

- 9.2.7 CCC said that the operation of the Proposed Development would result in a considerable level of HGV traffic, which would generate a large amount of GHG including CO₂.

National and International Carbon emissions targets

- 9.2.8 CCC highlighted that the Sixth Carbon Budget states there should be less residual waste sent to energy-from-waste facilities in order to reduce emissions. It also suggested that the Proposed Development should take into account the Transport Decarbonisation Plan published by the Department for Transport.
- 9.2.9 The County Council recommended that the quantification of avoided emissions should reflect the proportion of fuel currently used to produce electricity as well as the Committee on Climate Change's Balanced Net Zero Pathway assumptions regarding future changes in the electricity generation mix and grid carbon intensity.

Mitigation

- 9.2.10 CCC suggested the consideration of further operational mitigation beyond that set out in the PEIR and the use of optional additional mitigation, including carbon capture and use systems, to better achieve net-zero development.
- 9.2.11 The County Council identified that the current Euro 5 standard for HGVs is outdated and leads to considerable pollution. It advised that the Proposed Development



should commit to using electrified HGVs and provide a plan of how such vehicles would be used throughout the lifetime of the Proposed Development.

- 9.2.12 KLWN considered that carbon capture technology and storage is currently too inefficient and expensive to act as proper mitigation.

Prescribed Consultees

Assessment methodology and scope

- 9.2.13 Natural England provided support for the GHG assessment contained within Chapter 14 of the PEIR. It stated that the ES should be published in accordance with the England Biodiversity Strategy to ensure it properly considers the Proposed Development's impacts on biodiversity.
- 9.2.14 Wisbech Town Council expressed concern about the various climate change scenarios contained within the PEIR. It stated that further explanation is required regarding the 'reasonable worst-case scenario' for the future baseline. The Council also said that the future baseline scenario should consider other waste management options such as alternate thermal treatment technologies and the use of waste sites closer to the source of the waste. Wisbech Town Council expressed that a binary choice between landfill or incineration was not realistic.
- 9.2.15 Wisbech Town Council also raised concern regarding how the effects generated from transport emissions were considered within the PEIR in relation to the Proposed Development. It questioned whether by-products from IBA might need to be transported out of the country if there is no capacity within current UK facilities, and if the Proposed Development was correctly considering the effects from this potential scenario. Finally, it identified that further information would need to be provided to better explain how the Proposed Development calculates avoided emissions.

Mitigation

- 9.2.16 Natural England shared support for the mitigation proposals contained within Chapter 14 of the PEIR.

Persons with an interest in land (PILs)

National and International Carbon emissions targets

- 9.2.17 A PIL raised concerns about the HGV movements from the Proposed Development raising local CO₂ emissions well above the Government's net zero carbon target.



9.3 Section 47 Consultees

Members of the public

Assessment methodology and scope

- 9.3.1 A respondent requested more information in relation to annual CO₂ and carbon monoxide discharges from the Proposed Development, including the scale of discharges at full capacity and whether this would be in accordance with EA emission requirements.

Climate Change impacts

- 9.3.2 A number of members of the public expressed concern about GHGs and emissions produced by the Proposed Development, and the effects on climate change. Some highlighted the limited time available to address and reduce the effects of climate change. Others raised concern more generally with the Proposed Development, suggesting that it should not be constructed in the UK due to its contribution to climate change.
- 9.3.3 A respondent said that as the Proposed Development would result in the burning of products made up of fossil fuels, such as plastics, it should be considered unacceptable. Members of the public similarly expressed disappointment that any energy created by the Proposed Development would be considered 'green energy', as they considered the Proposed Development would undermine the UK's ability to combat climate change.
- 9.3.4 Members of the public highlighted a need for the climate change effects of the Proposed Development to be given considerable weight, as the local area is low lying and sensitive to the effects of climate change. A small number of respondents said that they could not understand how the Proposed Development could be considered acceptable in light of the recent Intergovernmental Panel on Climate Change (IPCC) report on climate change and current efforts to reduce carbon footprints. Many respondents also said that the Proposed Development becoming carbon neutral by 2050 or 2060 was unacceptable.
- 9.3.5 A respondent said that the Civil Engineering industry already contributes 8% of the world's climate emissions. They said that due to the fact climate change is now irreversible, the renewable energy benefits of the Proposed Development are considerably outweighed by its contributions to climate change, raising concerns with the number of vehicle movements relating to the development and cumulative and combined effects. They also highlighted that the climate effects from the materials required to construct and operate the Proposed Development, must be considered in detail and in combination with any other effects.
- 9.3.6 Respondents raised concern about the GHG emissions arising from diesel lorries and other non-electric vehicles, their contribution to climate change and the consequent impacts on the local environment, particularly the River Nene and aquatic life. Others questioned the practice of burning waste that could otherwise



be recycled or transporting waste to the EfW CHP Facility instead of using incinerator facilities closer to the sources of waste.

- 9.3.7 A consultee provided comment suggesting that the landfill of waste has a lower carbon impact than the Proposed Development due to it holding waste and preventing CO₂ from entering the atmosphere. They highlighted research from UKWIN which shows that the landfilling of non-decomposable waste is preferable to incineration due to its lower impact on climate change and suggested that it disproved statements to the contrary within the consultation documentation.

Operational carbon emissions

- 9.3.8 Many respondents were concerned by the potential for toxic emissions and pollutants to enter the surrounding area and atmosphere. Some specifically identified concerns about how carbon emissions would harm local farmland and food supplies.
- 9.3.9 A consultee raised concerns that the pollution produced by the EfW CHP Facility would likely harm the lime mortar used on some dwellings in the local area. Some respondents also expressed concern about the ash waste/bi-products of incinerating waste and how these would need to be landfilled.
- 9.3.10 A respondent requested that a non-incineration facility was created instead of the Proposed Development, as this would result in an annual saving of 2,000,000MW of energy and 450,000 tonnes of CO₂, and the better management of waste.

National and International Carbon emissions targets

- 9.3.11 Several members of the public expressed concern that the Proposed Development would be considered “green” and would therefore not have its emissions counted towards Governmental targets. These respondents said that the Proposed Development should not be considered “green” due to the volume of emissions it would produce. Respondents also said that the renewable energy potential of the Proposed Development was not of a sufficient scale to counter its negative effects.
- 9.3.12 Respondents queried whether the Proposed Development was in accordance with the requirements of COP26 targets. Respondents also expressed concern that about the volume of CO₂ emissions and that the CO₂ production during the project lifetime would be more than twice that of the carbon budgets for the Fenland and West Norfolk regions.
- 9.3.13 Many members of the public expressed concern that the Proposed Development would not be keeping with the ideals and spirit of the identified climate emergency the UK declared in 2019 and that it would compromise the achievability of European and UK emissions and climate change targets. Others expressed dissatisfaction that the Proposed Development was even being considered given the wide range of international and national targets that require a reduction in UK emissions. Several respondents said that stricter emissions reduction and climate change related laws/targets would be created in the future and the Proposed Development would only contribute towards compromising these. Another respondent queried how it



was possible for the UK to lead to the world on climate change and emissions reduction, whilst also allowing incineration developments.

9.3.14 A respondent queried the achievability of 100% carbon neutrality and stated that in the Government's haste to achieve this target, it is wrongly allowing incinerator projects. Others said that the burning of waste would compromise recycling targets and was not in accordance with the UK Government's call for recycling to increase.

9.3.15 Members of the public expressed concern that HGVs required for the construction and operation of the Proposed Development would result in emissions that are not in keeping with the Government's net zero goal. Many also raised concern about the number of HGV movements during the construction and operation of the Proposed Development, and the impact on the achievability of emissions and climate change targets. A respondent specifically identified that the HGV movements alone would cause Cambridgeshire to fail to meet its own local targets, particularly around the Fens. Another identified that renewable energy should be used for construction equipment to help meet international and national targets.

Mitigation

9.3.16 Members of the public frequently expressed concern that there were no clear plans for offsetting CO₂ and other GHG emissions produced by the Proposed Development and vehicles serving it.

9.3.17 Some respondents raised concerns that the effects of GHG emissions from construction materials were not being properly considered, and that their effects should be mitigated. It was also suggested that construction activities should be incorporated into the carbon calculations for the Proposed Development.

9.3.18 A respondent expressed disappointment that waste would be brought in by a variety of haulage companies, many of which would likely not use electric vehicles. They suggested that the Applicant should commit to only contracting haulage companies that use electric vehicles or sustainable alternate fuels.

9.3.19 Some members of the public recommended that carbon capture technology should be mandatory for the Proposed Development in order to reduce its emissions. One respondent questioned whether the Applicant had set aside sufficient funding to implement carbon capture technology and whether the Proposed Development would be proactive in implementing carbon capture technology or wait to be forced to by future legal requirements. Others raised concerns that carbon capture would be insufficient in mitigating the impacts of the Proposed Development due to its small scale, and the expense and inefficiency of the technology.

Monitoring, reporting and enforcement

9.3.20 A respondent expressed concern that the emissions from the Proposed Development will not be accurately monitored or reviewed due to local authorities and government bodies being under-resourced. They identified that inadequate reporting of emissions is a regular occurrence, including at existing energy-from-waste facilities in Dundee and Plymouth.



Businesses and Community Groups

Assessment methodology and scope

- 9.3.21 CPRE expressed concerns about the PEIR, suggesting that it understates the Proposed Development's contribution to climate change. It considered that the assumptions in the PEIR that waste not processed by the Proposed Development would end up in landfill, and that transportation of waste to the site and of by-products to landfill would result in less GHG emissions than landfilling, were both incorrect.

Climate Change impacts

- 9.3.22 CPRE highlighted local authorities' responsibility for the amount of GHGs produced within their jurisdiction and suggested the Proposed Development would contribute considerably to local GHG levels. It said that the burning of oil-based products and bio-waste would generate between 10,000 – 30,000 more tonnes of CO₂ per year than would be produced from the landfilling of such waste.
- 9.3.23 Icon Engineering Ltd expressed concern that the Proposed Development would contribute to climate change through burning waste and the large numbers of vehicle movements needed to support operations, which they suggested was counterproductive to combatting climate change.
- 9.3.24 Icon Engineering Ltd and Shampers Dog Grooming both commented that the Proposed Development has a greater adverse impact on climate change than the benefits it provides.

Operational carbon emissions

- 9.3.25 CPRE raised concern over the use of HGVs and the need for waste to be transported to the EfW CHP Facility. It questioned the need for the Proposed Development, stating that alternative treatment methods higher in the waste hierarchy like anaerobic digestion and recycling would be more suitable and environmentally friendlier, and result in less carbon emissions produced. It questioned the rationale for burning potentially recyclable materials and suggested that these materials would be much better served by being re-purposed.

National and International Carbon emissions targets

- 9.3.26 CPRE expressed concern that the Proposed Development would not comply with carbon reduction requirements set out in the Carbon Budget section of the Climate Change Act.
- 9.3.27 Shampers Dog Grooming highlighted the UK Government's commitment to going "green" and suggested that the Proposed Development would contradict this commitment.



Wider Stakeholders

Assessment methodology and scope

9.3.28 Steve Barclay MP expressed concern about the figures used in terms of predicted emissions. He considered that such figures would be considerably higher, especially over the lifetime of the Proposed Development. He also said that the Proposed Development would not have any positive effects over its lifetime due to the sheer number of emissions it would produce.

Climate Change impacts

9.3.29 Cambridge Friends of the Earth and Fenland and West Norfolk Friends of the Earth said that the energy produced by the Proposed Development would not be clean or renewable and would be insufficient to offset the carbon emissions also generated. Cambridge Friends of the Earth suggested that conventional fossil fuel-consuming forms of energy generation would produce more energy and less emissions than the Proposed Development.

9.3.30 Fenland and West Norfolk Friends of the Earth expressed concern that the energy-from-waste process is inefficient and results in the loss of material that could have been recycled. They highlighted the need for the climate change and ecological crises to be addressed and suggested that the Proposed Development should not be granted consent due to its climate impacts.

9.3.31 Steve Barclay MP said that instead of incinerating waste, waste should be reduced and recycled as this has less effects on the climate and is better for the local natural/built environment.

Operational carbon emissions

9.3.32 Steve Barclay MP suggested that emissions from the Proposed Development would affect the town of Wisbech. He also questioned how sourcing waste from 12 Local Authorities would be treating waste locally. He said that many of the HGV trips would take longer than two hours to complete, further increasing the emissions produced by the operation of the Proposed Development and that the Proposed Development would likely compromise the de-carbonisation of the energy grid within the UK.

National and International Carbon emissions targets

9.3.33 Cambridge Friends of the Earth said that the Proposed Development would not comply with carbon reduction requirements set out in the Carbon Budget section of the Climate Change Act.

9.4 How feedback has influenced the DCO application

9.4.1 As outlined above, a range of comments were received from consultees in relation to GHG emissions and climate change. A summary of how feedback has been taken into account in the preparation of the DCO application is provided below with full



details of the feedback received and the Applicant's response presented in tabular format in **Appendix JJ** (Table 2.1).

- 9.4.2 As part of the Stage 2 Statutory Consultation, the Applicant presented the preliminary findings of the climate change assessment in Chapter 14 of the PEIR. In response to feedback received as well as ongoing engagement with Stakeholders, the Applicant has reviewed its proposals and updated its assessments accordingly. This includes providing additional information, addressing discrepancies or providing clarity as noted by consultees and reviewing the assessment of likely significant effects.

Assessment methodology and scope

- 9.4.3 With consideration to concerns from consultees regarding the approach to determining predicted emissions over the lifetime of the Proposed Development, the GHG assessment presented in **Chapter 14: Climate Change (Volume 6.2)** of the ES applies a methodology for estimating GHG emissions which accords with the latest Institute of Environmental Management and Assessment (IEMA) guidelines and considers each stage of the development (construction, operation and decommissioning). The significance criteria have been updated in the ES to reflect release of the second edition of IEMA's GHG assessment guidance.
- 9.4.4 At the time of undertaking the GHG assessment for the PEIR, emissions factors were based on the most recently available BEIS GHG reporting conversion factors. In **Chapter 14: Climate Change (Volume 6.2)** of the ES, emissions factors have been updated to reflect datasets available for 2021. The GHG assessment, as set out in **Chapter 14: Climate Change (Volume 6.2)** of the ES also includes an updated assessment of transport related emissions using the Defra Emissions Factors Toolkit.
- 9.4.5 The GHG assessment in ES **Chapter 14: Climate Change (Volume 6.2)** is based on a comparison of the 'with Proposed Development' case (i.e., the EfW CHP Facility) to the 'without Proposed Development' case. The GHG emissions for the 'without Proposed Development' case have been calculated assuming waste is collected and transported to available landfill sites.
- 9.4.6 The assessment described in ES **Chapter 14: Climate Change (Volume 6.2)** is based on assessing whether the Proposed Development would impede the UK in being net zero by 2050, this being the UK position in terms of meeting international obligations to reduce carbon emissions. This assessment is complemented by an assessment of the change in emissions in the context of regional/local emissions and regional/local policies where applicable.
- 9.4.7 The ES also includes further analysis to consider the sensitivity of avoided emissions for energy generated by the EfW CHP Facility compared to increasing decarbonisation of the UK electricity grid. The sensitivity assessment also considers potential changes to waste composition in terms of targets to reduce food, plastics and other recyclables in residual waste.
- 9.4.8 IBA will be collected for recycling off-site at a suitably licenced facility in the UK. Air Pollution Control residues (APCr) will be sent to a suitable facility for disposal or



recycling. The Applicant can confirm emissions associated with the transport of IBA and APCr are included in **Chapter 14: Climate Change (Volume 6.2)** of the ES which is submitted in support of the DCO application.

- 9.4.9 GHG benefits associated with combustion of landfill gas (LFG) to generate electricity have been included in the assessment. The GHG assessment for landfill methane is based on independent reporting from Defra factors for UK landfills and WRAP survey of waste composition.
- 9.4.10 The GHG assessment presented in ES **Chapter 14: Climate Change (Volume 6.2)** has no defined spatial boundary. The receptor (Earth's climate system) is global in nature, so there are no localised effects to consider.
- 9.4.11 A full list of assumptions made in the GHG assessment has also been appended to the ES (**Appendix 14A**).
- 9.4.12 As part of the drafting of the submission version of the **Waste Fuel Availability Assessment (WFAA) (Volume 7.3)**, further consideration has been given to the scope of the Study Area for assessment. In line with the existing National Policy Statement for Renewable Energy Infrastructure (EN-3) and the emerging updated version of this, the WFAA now considers the availability of waste in the context of local and national need. With regard to local need, the extent of the Study Area has been informed by the 2-hour travel time and is defined as being the former East of England planning region. This now excludes Coventry, North East Lincolnshire, North Lincolnshire, Nottingham City, Nottinghamshire, and Warwickshire.
- 9.4.13 The WFAA identifies that landfill disposal is the reasonable alternative for the management of residual waste proposed to be used at the EfW CHP Facility. The WFAA also identifies that some residual waste may be incorporated in exports of Refuse Derived Fuel (RDF) but highlights that RDF exports have been reducing and government policy is on applying the proximity principle (i.e., managing waste at a location as close as reasonably possible to where waste is generated).

Climate change impacts

- 9.4.14 In response to concerns raised by consultees about increased carbon emissions from the Proposed Development, the Applicant has provided an assessment which is described in ES **Chapter 14: Climate Change (Volume 6.2)**, Section 14.9.
- 9.4.15 It is acknowledged that as a standalone entity the Proposed Development results in net carbon emissions when considering emissions from the EfW combustion processes compared to avoided emissions for energy generated by the EfW CHP Facility. However, the GHG assessment indicates a net reduction in emissions of -2,570.80 ktCO_{2e} in the 'with Proposed Development' scenario compared to a 'without Proposed Development' scenario where waste is sent to landfill.
- 9.4.16 The EfW CHP Facility provides an option for the management of residual waste, remaining after the removal of recyclables, which moves the management higher up the waste hierarchy than the alternative 'without Proposed Development' scenario where waste is sent to landfill.



- 9.4.17 It is acknowledged that the GHG assessment presented in **Chapter 14: Climate Change (Volume 6.2)** of the ES indicates higher carbon emissions from transport in the 'with Proposed Development' scenario compared to a 'without Proposed Development' scenario. However, transport emissions represent approximately 3.4% of total emissions over the lifetime of the EfW CHP Facility and the assessment indicates an overall net reduction in emissions in the 'with Proposed Development' scenario compared to a 'without Proposed Development' scenario. The GHG assessment assumes worst-case transport emissions (i.e., diesel fuel) even though it is envisaged that transport related emissions will reduce in the future with a move to electrification of collection vehicles.
- 9.4.18 The composition of residual waste means it contains less energy than conventional fossil fuels (i.e., natural gas/coal) and may be considered to be less efficient in the conversion of the fuel (waste) into energy when compared to the combustion of conventional fossil fuels. However, the benefits of the EfW CHP Facility compared to CO₂ emissions from conventional fossil fuels are that as well as generating energy, the EfW CHP Facility avoids the emissions that would otherwise result from landfill disposal.
- 9.4.19 Resilience measures have been incorporated into the climate change resilience (CCR) assessment in ES **Chapter 14: Climate Change (Volume 6.2)**. The assessment demonstrates the effects of a changing climate on the Proposed Development, including how the design will mitigate the anticipated impacts of climate change.

Operational carbon emissions

- 9.4.20 The GHG assessment presented in **Chapter 14: Climate Change (Volume 6.2)** of the ES includes emissions associated with both construction and operation. It indicates an overall net reduction in emissions in the 'with Proposed Development' scenario compared to a 'without Proposed Development' scenario.
- 9.4.21 In relation to concerns raised by consultees about how the Proposed Development would harm local farmland and food supplies, the Applicant has prepared a Human Health Risk Assessment (ES **Chapter 8: Air Quality (Volume 6.2) (Appendix 8B, Annex G)**). This considers the potential effects arising from the Proposed Development on humans, including through food grown locally. It concludes that effects upon human health would be negligible. Dispersion modelling has also been carried out and identifies that pollutant concentrations and deposition levels are likely to be comparable to nearby agricultural areas. This is presented in ES **Chapter 8: Air Quality (Volume 6.2)**.

National and international carbon emissions targets

- 9.4.22 The assessment described in ES Chapter 14 is based on assessing whether the Proposed Development would impede the UK in being net zero by 2050, this being the UK position in terms of meeting international obligations to reduce carbon emissions. The assessment includes evaluation of emissions with respect to UK Government 5-year carbon budgets, indicating a minor reduction in emissions ranging from between 0.004% to 0.03% for the 4th, 5th and 6th carbon budgets.



- 9.4.23 GHG impacts of the Proposed Development will have a beneficial significant effect. The Proposed Development has net GHG emissions below zero, causing an indirect reduction in atmospheric GHG emissions which has a positive impact on the UK Government meeting its carbon budgets/targets.
- 9.4.24 Concerns were also raised that the Proposed Development does not comply with national policies and the UK's Sixth Carbon Budget recommendations. The Applicant considers that the Proposed Development is compliant with NPSs as set out within the Planning Statement which is submitted as part of the DCO.

Mitigation

- 9.4.25 Embedded mitigation measures to reduce GHG emissions associated with the Proposed Development have been considered in the assessment presented in **Chapter 14: Climate Change (Volume 6.2)** of the ES. This includes consideration of low carbon technologies in construction and operation, which may include the use of electric vehicles where practicable.
- 9.4.26 The EfW CHP Facility has also been designed to allow the export of steam and electricity to surrounding business users. The Proposed Development also allows sufficient space for the plant and equipment for a CCS facility if required by legislation in the future (including plant and equipment to capture carbon dioxide (CO₂) from the flue gas emissions of the EfW CHP Facility and transport this to a storage facility). Furthermore, the steam turbine will be designed so as to be ready for installation of a controlled low pressure steam extraction, space will be available for condensate return to the main condensate system, diversion of flue gas through the CCS facility and installation of an additional 11kV circuit breaker, plus a pre-installed duct from the switch room CCS facility.

Monitoring, Reporting and Enforcement

- 9.4.27 All EfW facilities in England require an EP from the EA to operate. The EP will set the emission limits and monitoring and reporting requirements for the facility. CO₂ emissions from the EfW CHP Facility will be continuously monitored and recorded in accordance with the requirements of the EP.



10. Construction

10.1 Introduction

- 10.1.1 As part of the Stage 2 Statutory Consultation, the Applicant sought feedback in relation to the design of the Proposed Development, its impacts and the mitigation measures proposed to reduce the impacts of the Proposed Development on the local environment and community.
- 10.1.2 This chapter provides a summary of the relevant consultation feedback received from prescribed consultees, local authorities, members of the public and wider Stakeholders grouped under the following headings:
- Access;
 - Adverse impacts of construction;
 - Construction mitigation;
 - Construction related communication;
 - Construction safety; and
 - Traffic and Transport.
- 10.1.3 Where comments have not been received under the headings above, these have been removed to reflect this. The issues raised by respondents have also been grouped in table form at **Appendix JJ** (Table 3.1), which includes the Applicant's response.

10.2 Section 42 Consultees

Local Authorities

Access

- 10.2.1 NCC and specifically NCC Highways department objected to the site proposed for Temporary Construction Compound 2 based on potential access difficulties. The Council and the highways department were of the view that the narrowness of the road, along with known difficulties with turning right, renders the access road to the temporary construction compound unsuitable for use.
- 10.2.2 NCC and NCC Highways department were of the view that the location for Temporary Construction Compound 3 appears more acceptable, but shared concern about potential visibility issues with access. The Council and the highways department said that access visibility issues could be overcome by the removal of hedges and/or traffic management, however, given that this would have an impact on the visual landscape, the access design would need to be agreed in advance. The Council and the highways department asserted that without that agreement in



place, the council and its highways department would object to the inclusion of the Temporary Construction Compound.

Construction related communication

- 10.2.3 FDC objected to the use of land it owns for the purposes of the Proposed Development. It identified that the proposed layout of temporary construction facilities in PEIR Chapter 3 includes land in their ownership, despite no agreement to include this land within the proposals.
- 10.2.4 NCC noted that the proposed construction of the Grid Connection would consist of both underground cables (UGC) laid by a combination of open cut trenching and HDD, along with overhead cables mounted on poles. It identified that HDD will be used at road crossings and two Internal Drainage Board (IDB) ditches. The Council said that it is unclear whether the underground cables will need to cross other ordinary watercourses under IDB jurisdiction and requested clarification.
- 10.2.5 NCC also expressed concern that there was no information within the consultation materials about the typical time that the groundworks for the construction of the grid connections would be open for.

Construction safety

- 10.2.6 FDC raised concern about the safety challenges of working within and alongside current live rail infrastructure, particularly the nearby track bed.

Prescribed Consultees

Construction mitigation

- 10.2.7 Natural England said that construction works for cable laying would require existing top and sub-soil to be removed, stored, and then backfilled. It recommended that Defra's guidance "Construction Code of Practice for the Sustainable Use of Soils on Construction Sites" be used in both the design and construction of the Proposed Development.
- 10.2.8 Natural England also said that an experienced soil specialist should be consulted to advise on, and supervise soil handling, including identifying when soils are dry enough to be handled and how to make the best use of soils on site.

Construction related communication

- 10.2.9 National Grid advised that written permission will be required from them before any works commence within the easement strip.
- 10.2.10 Royal Mail requested that they be consulted in advance of the creation of the Construction Traffic Management Plan (CTMP) and for it to incorporate its feedback on the Proposed Development. It also requested information on any potential road closures to be communicated with themselves at least one month in advance, in order to ensure alternate traffic routes can be identified.



Construction safety

- 10.2.11 National Grid said that the position and depth of the National Grid high pressure gas pipeline near the Proposed Development must be established onsite in the presence of a National Grid representative. It said that an agreed safe working method will also be required should any embankment or dredging works be proposed, or excavations be planned within 3 metres of National Grid High Pressure Pipeline or within 10m of an Above Ground Instillation (AGI). It also said that drilling or excavation works should not be undertaken if they have the potential to disturb or adversely affect the foundations of any existing pylon.

Persons with an interest in land (PILs)

Adverse impacts of construction

- 10.2.12 A respondent expressed concern regarding the installation of poles and overhead cables for the grid connection, and the effects on livestock at an equine farm. They identified that livestock can be easily spooked and there was concern about miscarriage in pregnant horses.

10.3 Section 47 Consultees

Members of the public

Adverse impacts of construction

- 10.3.1 Members of the public expressed concern about significant disruption to local residents during the 3-year construction period for the Proposed Development.
- 10.3.2 Concerns were also raised in relation to watercourses near to the Proposed Development and the risk of contamination during construction, with some respondents suggesting that surface water could potentially flood a nearby factory causing damage.
- 10.3.3 Members of the public said that construction of the Proposed Development would require pile-driving due to the geological structure of the proposed site. Some specifically raised concern about the dust, noise, and vibration effects, whilst others said that it could cause damage to neighbouring properties including the nearby school and other businesses and infrastructure.
- 10.3.4 A respondent proposed that the potential impacts to human health from contaminants in the construction phase should be assessed. They said that as many residents remain in the area for long periods, the continued exposure to potential contaminants is a concern. More general comments from respondents requested that the health and wellbeing of residents in the community be fully considered during the construction period in advance of the Proposed Development being approved.



Traffic and Transport

- 10.3.5 A respondent said that there would be a significant increase in HGVs on local roads during the construction period, and that this would not only have an effect on the roads, resulting in damage but would make the area less safe for the community.

Businesses and Community Groups

- 10.3.6 There were no representations from businesses and community groups in relation to construction.

Wider Stakeholders

Adverse impacts of construction

- 10.3.7 Fenland and West Norfolk Friends of the Earth said that local residents would experience vibration and noise from pile-driving during the construction period of the Proposed Development.

Construction related communication

- 10.3.8 Steve Barclay MP requested clarification on the timescales for agreement with Network Rail for infrastructure relating to the construction of the CHP connection.

10.4 How feedback has influenced the DCO application

- 10.4.1 As outlined above, a range of comments were received from consultees in relation to the construction of the Proposed Development. A summary of how feedback has been taken into account in the preparation of the DCO application is provided below with full details of the feedback received and the Applicant's response presented in tabular format in **Appendix JJ** (Table 3.1).

Access

- 10.4.2 The Applicant recognises the need to limit disturbance to local communities and the travelling public from construction activities and temporary construction compounds as far as reasonably practicable. In response to the feedback received during the Stage 2 Statutory Consultation as well as ongoing landowner and Stakeholder engagement, the Applicant reviewed the options for the proposed Grid Connection. It concluded that a wholly underground connection to the Walsoken DNO Substation should form the Proposed Development. As a result, the TCC for the Grid Connection will be located within the EfW CHP Facility Site and TCCs 2 and 3 are no longer required. The concerns raised about the construction impacts associated with the previously proposed overhead line will be removed.
- 10.4.3 Land identified in the PEIR as part of the Proposed Development which is in the ownership of FDC, remains within the boundary of the Proposed Development. However, in response to the feedback received from FDC the Applicant has refined its proposals to reduce the area of land required.



Adverse impacts of construction/Construction mitigation

- 10.4.4 As part of the Stage 2 Statutory Consultation a draft Outline CEMP was published. This set out the responsibilities and environmental standards that the Applicant would contractually require the Engineering, Procurement and Construction (EPC) Contractor (and any sub-contractors) to adopt for the construction of the Proposed Development. In response to feedback received and as part of the finalisation of its DCO application, the Applicant has reviewed and updated the document. The **Outline CEMP (Volume 7.12)** is submitted in support of the DCO application. This provides a framework for detailed management plans to be prepared at the detailed design stage and will be implemented for the duration of construction. It includes an Outline Soil Management Plan (**Appendix C**) that provides protocols for the stripping, storage and re-use of soils on-site, as well as the import and export of soils.
- 10.4.5 An air quality and a noise and vibration assessment has been conducted which assesses (amongst other matters), the likely effects of the construction of the Proposed Development on dust, noise, and vibration within the area. The findings of this assessment are presented in ES **Chapter 7: Noise and Vibration (Volume 6.2)** and ES **Chapter 8: Air Quality (Volume 6.2)**. The **Outline CEMP (Volume 7.12)** also considers the management of dust, noise and vibration through Dust Mitigation Measures (**Appendix A**) and an Outline Construction Noise and Vibration Management Plan (**Appendix F**).

Construction related communication

- 10.4.6 The description and approach to the construction of the Grid Connection is provided within ES **Chapter 3: Description of the Proposed Development (Volume 6.2)**. ES **Chapter 12: Hydrology (Volume 6.2)** and associated figures (**Volume 6.3**) also identifies the watercourses crossed by the Grid Connection. Consultation has been ongoing with the IDBs since the Stage 2 Statutory Consultation such that any requirements for watercourse crossings are clearly understood.
- 10.4.7 Clarification on the timescales for the construction of the CHP connection are set out in ES **Chapter 3: Description of the Proposed Development (Volume 6.2)**.

Construction safety

- 10.4.8 As a result of the Applicant's decision to select an underground connection to Walsoken DNO Substation for the Proposed Development, works are no longer required in the vicinity of the National Grid high pressure gas network removing concerns about safety during construction of the Proposed Development.

Traffic and Transport.

- 10.4.9 The Applicant recognises that consultees expressed concern about the impact of construction traffic on the local transportation network and road safety. As part of the production of the ES a traffic and transport assessment has been conducted which assesses (amongst other matters), the likely effects of the construction of the Proposed Development on the traffic and transportation network, including



pedestrian and road safety. The findings of this assessment are presented in ES **Chapter 6: Traffic and Transport (Volume 6.2)**. An **Outline CTMP (ES Appendix 6A: Outline CTMP (Volume 6.4))** has also been prepared and is submitted with the DCO application.



11. Consultation

11.1 Introduction

- 11.1.1 As part of the Stage 2 Statutory Consultation, the Applicant sought feedback in relation to the approach to consultation, the events and the materials provided to support the consultation.
- 11.1.2 This chapter provides a summary of the relevant consultation feedback received from prescribed consultees, local authorities, members of the public and wider Stakeholders grouped under the following headings:
- Consultation correspondence;
 - Consultation documents;
 - Consultation events;
 - Consultation feedback;
 - Consultation suggestions;
 - Consultation website; and
 - Materials and information requests.
- 11.1.3 Where comments have not been received under the headings above, these have been removed to reflect this. The issues raised by respondents have also been grouped in table form at **Appendix JJ** (Table 4.1), which includes the Applicant's response.

11.2 Section 42 Consultees

Local Authorities

Consultation correspondence

- 11.2.1 FDC questioned why the consultation materials identified that the proposed site for the Proposed Development appears to include land that is owned by the Council. It said that currently there is no agreement to relinquish this land to the Applicant.
- 11.2.2 KLWN questioned why the Applicant requested direct engagement with Clenchwarton Parish Council in August, a month in which the Parish Council does not meet.
- 11.2.3 NCC Highways Authority expressed concern that the PEIR provided no record of the meeting held on the 21 January 2021, in which it provided feedback on the Proposed Development. NCC also shared concern that statements made in the PEIR appeared to contradict its records of discussions and requested clarity on the source of the information.



Consultation events

- 11.2.4 KLWN provided a range of comments in relation to the consultation events, it considered that:
- Statements made by staff at events were untrue or misleading.
 - The location of consultation events was not effective. It considered that an event should have been held in King's Lynn and as a result the communities of King's Lynn, West Lynn and Clenchwarton had not been properly consulted.
 - Events in locations that could only be accessed by car excluded older populations and reduced accessibility to the consultation process.
 - The supporting documentation and information provided at consultation events was incomplete and difficult to understand.

Consultation feedback

- 11.2.5 CCC said that the PEIR presented a level of preliminary assessment appropriate to enable consultees to develop an informed view of likely environmental effects. The Council also said that the Applicant's approach to EIA has encompassed public, Stakeholder and consultee engagement and that the consultation process had considered the ongoing COVID-19 pandemic.
- 11.2.6 KLWN expressed dissatisfaction with the consultation period taking place over July and August when many people would be on holiday and less able to engage in the consultation.

Consultation suggestions

- 11.2.7 KLWN questioned why the consultation zone did not align with the 15km air quality Study Area. It considered that this discrepancy meant affected communities were not consulted and suggested that the community of King's Lynn should have been consulted.

Prescribed Consultees

Consultation feedback

- 11.2.8 Wisbech Town Council said that the consultation materials and supporting documents were too long and difficult to properly consider and provide feedback on. It requested that the information be expressed in a clearer and more concise format, as the NTS in the PEIR does not provide sufficient information to properly inform readers and identify the potential effects of the Proposed Development. The Town Council further advised that they considered that the consultation is not in accordance with sections 47(7) and 50(3) of the 2008 Planning Act in this regard. It identified that it is unlikely that members of the public would be able to understand a 3,000-page document and then provide valuable feedback in the time provided.



- 11.2.9 Wisbech Town Council also said that with the consultation period taking place over July and August when many people would be on holiday and less able to engage in the consultation.

Persons with an interest in land (PILs)

Consultation correspondence

- 11.2.10 Several PILs said that the information provided was often incorrect/out of date and that the agents did not accurately answer questions. A PIL also identified that project agents didn't understand the local area and land ownership details were often not correct. Other PILs raised concern that phone calls to the project team were not returned.

Consultation documents

- 11.2.11 Some PILs said that the information provided within the consultation was complicated and difficult to understand.

11.3 Section 47 Consultees

Members of the public

Consultation correspondence

- 11.3.1 Several respondents identified that despite trying to contact the Proposed Development on the phone number provided, they did not receive a response.
- 11.3.2 Some members of the public considered that the issuing of compulsory purchase letters was being used as a bully tactic by the Applicant, whereas others said that the Applicant's information relating to the town of Wisbech was not sincere and were just marketing.
- 11.3.3 One respondent expressed concern that people with poor IT literacy or those who do not have access to a computer, would only know about the Proposed Development through third-party information.

Consultation documents

- 11.3.4 Members of the public said that the consultation documentation was not clear, open enough and/or not containing enough information. Many also said that the consultation documentation was inconsistent in terms of the information provided, and that it contained inaccuracies. A respondent requested consultation documentation be more readily available in other languages or at least made easier to understand for people who do not have English as a first language. Several respondents requested the consultation document and reports associated with the Proposed Development to be available for a considerably longer period.



- 11.3.5 A respondent expressed concern that information within the consultation documents was not clear in relation to proposed lorry access even though the consultation was specifically asking for feedback on this element. Another respondent similarly expressed the view that local communities had been provided conflicting information about the proposed site access. A further respondent highlighted that they had not seen any information relating to the removal of by-products (bottom ash) and its potential effects and as such could not provide feedback on its transportation.
- 11.3.6 Members of the public commented on the design and style of the consultation documentation suggesting that the consultation booklet was misleading given the considerable effects the Proposed Development would have.
- 11.3.7 A respondent expressed concern that plans within the consultation documentation did not have keys and were not interpretable by the Applicant's representatives. They said that clearer maps were required which provided the Proposed Development redline boundary and for further guidance to be given on what the redline boundary would mean for local properties and landowners.
- 11.3.8 Some members of the public said that the consultation questionnaire was too limiting and did not allow for sufficient feedback to be shared.
- 11.3.9 A respondent expressed concern that the consultation leaflet indicated that the Proposed Development could provide energy for 74,000 homes, however, when discussed at a consultation event project staff identified that power produced from the Proposed Development would only be for businesses.
- 11.3.10 A member of the public commented that the consultation documentation was good but noted that there were no references to waste reduction and recycling and how these methods could be used.

Consultation events

- 11.3.11 Several members of the public requested additional consultation events over a much larger geographical area to ensure consultees are not missed. A respondent specifically requested that consultation events be held in Elm, Guyhirn and Leverington, while another raised concern that these villages had been avoided in the events programme due to them being most affected by the Proposed Development.
- 11.3.12 Other members of the public provided alternate suggestions for the format of consultation events, including that events take place over a week to provide sufficient opportunity for attendance.
- 11.3.13 A member of the public said that information and documentation provided at consultation events was incorrect or out of date. Respondents also highlighted that some information or documents, including the Biodiversity Action Plan for The Wash were not available at the events. Several respondents said that they found the project staff to be helpful and polite, whilst other members of the public expressed the view that they and others had been patronised by project staff during discussions.



Consultation feedback

- 11.3.14 Members of the public expressed concerns with the consultation process. They said that the consultation documents lacked clarity and were difficult to understand. Respondents also said that there was too much information and that simple overviews were often not provided to help people understand the effects.
- 11.3.15 Other respondents considered that the consultation was flawed as they felt the consultation process had been at short notice and rushed.
- 11.3.16 Members of the public expressed concern that they had not been consulted at an earlier stage or given more time to respond. Some respondents said that they were unaware of the Proposed Development until the most recent consultation and that those most likely to experience effects from the Proposed Development had not been sufficiently consulted.
- 11.3.17 Members of the public expressed concern that local businesses had not been informed about the consultation. Comments were also received indicating that local travelling communities in close proximity to the proposed site were also unaware of the consultation.
- 11.3.18 A member of the public said that it was difficult to consider the potential effects of the Proposed Development as the plans kept changing. Similarly, a further respondent considered that the information at consultation events was not correct and project staff at events were unable or unwilling to address questions.
- 11.3.19 Some members of the public considered that the Applicant was using the DCO process in order to make it harder for local communities and residents to reject the Proposed Development and to provide their input.
- 11.3.20 Many respondents expressed the view that the consultation process had not been well considered given the ongoing COVID-19 pandemic and that COVID-19 was being used as an excuse for rushed and ineffective consultation. A member of the public also identified that many residents would not attend consultation events due to COVID-19 restrictions/personal safety and said that more should have been done to engage these consultees safely.
- 11.3.21 A member of the public said that the local newspapers which were used to advertise the consultation were not effective. They also identified that the Applicant had failed in its duty to inform the public, especially people who do not have English as a first language.
- 11.3.22 Members of the public questioned why there was no PR programme to support the consultation and better communicate the facts and benefits of the Proposed Development. Other comments received said that Applicant should take inspiration from consultation events in Germany for similar proposals.
- 11.3.23 A respondent considered that the physical feedback forms would be rejected and would just become waste, whilst other members of the public called for all responses and feedback to be analysed by an independent third party to ensure that no responses are discarded, and the information is properly reviewed.



Materials request/More information

- 11.3.24 Several members of the public expressed a need for clear and honest information on the Proposed Development. A few respondents specifically referenced the plan for sustainability, whilst others requested additional information relating to the risks of the Proposed Development and how they are assessed and mitigated.
- 11.3.25 A member of the public requested information on the purpose of the proposed community workshops and how this would differ from what is already available in the local area. Another member of the public provided their view that the Local Liaison Group would have very little power and influence once the Proposed Development is consented.

Consultation suggestions

- 11.3.26 Members of the public often requested more consultation events and for these events to have clear and open documentation/information. Several respondents also suggested that consultation events be held outside of work hours for more people to be able to attend.
- 11.3.27 Some respondents suggested that a scale model of the Proposed Development be presented at consultation events to aid understanding of the scale and impacts of the site and the chimneys.

Consultation website

- 11.3.28 Some members of the public said that the consultation website was well designed and provided a good level of project information. Others said that the website contained insufficient information and did not answer their questions.
- 11.3.29 Several respondents said that there was an over reliance upon information provided on the website, suggesting that not everyone would have access to it or would not have sufficient time to review. One respondent suggested that this approach contradicted legal consultation requirements.

Businesses and Community Groups

Consultation documents

- 11.3.30 Elm Road Primary School and Nene and Ramnoth School expressed concern, that the consultation document contained vague assurances with no concrete commitments that they will be kept beyond the stage of approval.
- 11.3.31 Fascinating Fens raised concerns that the information provided in the consultation was insufficient and did not provide a balanced view of the Proposed Development.
- 11.3.32 WEP Fabrications Ltd said that consultation material should be translated into other languages so that local residents and workers who speak English as a second language can be consulted.



Consultation events

11.3.33 Icon Engineering Ltd raised concerns that the project team provided mixed and contradictory information at the consultation events.

Consultation feedback

11.3.34 Icon Engineering Ltd said that it learned about the Proposed Development from third parties instead of being directly consulted by the Applicant. It considered that consultation with businesses and properties close to the Proposed Development had not been properly carried out and that insufficient information had been provided to review the Proposed Development. It requested clearer information and answers be provided to questions raised.

Consultation website

11.3.35 Fascinating Fens said that the information available on the website only identified the benefits of the Proposed Development which made it difficult to properly consider the impacts.

Wider Stakeholders

Consultation documents

11.3.36 Fenland and West Norfolk Friends of the Earth questioned why the consultation materials and supporting information did not contain other alternatives to incineration and landfill. It said that other waste management strategies would reduce the need for incineration or landfilling and should therefore be considered.

11.3.37 Steve Barclay MP said that the consultation documents were unclear and unconcise. He said that the documents emphasised the benefits of the Proposed Development while downplaying impacts, that the documentation was not in accordance with Government guidance and that the PEIR contained assessment methodologies rather than assessment results.

11.3.38 Steve Barclay MP raised concerns that the consultation documents lacked information or detail on the following areas:

- The proposed highway improvements;
- The alternate sites considered;
- Location-specific weather information;
- The residential amenity assessment;
- How the Proposed Development will be connected to the Grid Connection and nearby substations;
- Mitigations utilised by the Proposed Development, such as carbon capture;
- The disposal and transportation of hazardous waste;



- The disposal of bottom ash and its transportation; and
- The air quality modelling.

11.3.39 Steve Barclay MP also queried how the Applicant could have fully consulted with residents on the effects of the Proposed Development when the residential amenity assessment was not provided. He said that the consultation was premature due to this lack of information and that consultees were unable to give informed feedback.

11.3.40 The MP expressed concern regarding the figures for potential GHG emissions resulting from the Proposed Development, requesting accurate and realistic GHG emissions be provided and consulted upon. He also said that the modelling of abnormal operations be provided to ensure that unlikely events are also consulted upon.

Consultation feedback

11.3.41 Steve Barclay MP expressed concerns that the Applicant had not fulfilled commitments set out in the Statement of Community Consultation, particularly regarding the provision of clear and concise technical and non-technical information. He also said that the consultation had not fulfilled guidance set out in PINS Advice Note 7 as he considered that it did not provide information required by consultation bodies to develop a view of the Proposed Development's effects.

11.3.42 The MP said that the Applicant should identify when it would respond to feedback received to the consultation in order to comply with DCO requirements and guidance.

Consultation suggestions

11.3.43 Steve Barclay MP requested further rounds of consultation on the full preliminary environmental information and the following matters in a clear and concise manner:

- Carbon capture elements of the project;
- The project description;
- Grid Connection proposals;
- Highways improvements;
- Residential amenity impacts;
- Ash waste;
- Air quality;
- Traffic;
- GHG emissions; and
- The Waste Fuel Availability Assessment.

11.3.44 The MP requested that a further round of consultation allow for the assessment and review of the proposed mitigation measures, including the provision of information



to respond to previous requests made by himself and other consultees. He also suggested that consultation be undertaken to review the design arrangements for the A1101 Elm High Road and A47 Broadend Crossings and the likely effects of the Proposed Development on these elements.

Materials request/More information

- 11.3.45 Steve Barclay MP recommended that the Applicant identify when detailed information on supporting developments, substation design and highways improvements would be provided and consulted upon.

11.4 How feedback has influenced the DCO application

- 11.4.1 As outlined above, a range of comments were received from consultees in relation to consultation undertaken on the project. Full details of the consultation undertaken, the responses received and how the Stage 2 Statutory Consultation complies with the statutory requirements of the Planning Act 2008 are presented in Chapter 5 of this report. A summary of how feedback has been taken into account in the preparation of the DCO application is provided below with full details of the feedback received and the Applicant's response presented in tabular format in **Appendix JJ** (Table 4.1).

Consultation correspondence

- 11.4.2 As part of the Stage 2 Statutory Consultation, the Applicant notified all Stakeholders as required under Section 42, 47 and 48 of the Planning Act 2008. These notifications were sent out to consultees at the outset of the consultation in line with the proposals set out in the published SoCC and included a direct mail to all properties within the consultation zone, as well as notifications to local authorities, prescribed consultees and PILs. The SoCC and the methods proposed for consultation within it were discussed and agreed through formal consultation with the host local authorities.
- 11.4.3 Feedback was received which raised concern about the receipt of correspondence regarding land within the project boundary. In line with the requirements of Section 42 of the Planning Act 2008, all those with an interest in land identified for the Proposed Development were notified at the outset of the Stage 2 Statutory Consultation. Following Stage 2 Statutory Consultation the Applicant has carefully considered all feedback received and has refined the design of the Proposed Development such that it has minimised the area of land required. It is the Applicant's firm intention to continue to seek voluntary agreements with all PILs, however if a voluntary agreement cannot be reached then the Applicant will seek to exercise the powers of compulsory acquisition and temporary possession sought within the DCO application.
- 11.4.4 A range of comments were received in relation to the project phone line. At the outset of the Stage 1 non statutory consultation in May 2020, the Applicant launched a project contact point (local rate telephone number) for questions relating to the Proposed Development. Following the Stage 1 consultation, this number has



remained live for the duration of the Project and will remain in place until the DCO application has been determined.

11.4.5 The SoCC which was published as part of the Stage 2 Statutory Consultation made clear that consultees could contact this number to discuss the project, leave a message, request hard copies of documents or request a telephone appointment to discuss the project. The SoCC also set out that all queries related to the consultation and the project would aim to be responded to within 10 working days. During the Stage 2 Statutory Consultation, the Applicant received 53 calls to the phonenumber, which sought clarity on aspects of the Proposed Development or the consultation. The Applicant can confirm that all messages relating to the consultation or the project were responded to in line with this commitment and during the consultation period.

Consultation Documents

11.4.6 The SoCC which was published as part of the Stage 2 Statutory Consultation, identified that a number of documents and plans had been produced to support the consultation.

11.4.7 Recognising the complexity of the Proposed Development and the objectives for consultation, the materials shared were structured in a format to allow consultees with different levels of understanding and interest in the Proposed Development to access information at a range of levels of detail. When developing the consultation materials, a great deal of consideration was given to the presentation of the proposals in a user-friendly way. This included writing in layman's terms where possible, presenting information using diagrams, images or illustrations. The documents included clear references and signposting to where further information could be found if required.

11.4.8 The documents published included:

- Consultation booklet - A non-technical document summarising the elements of the Project, as well as information on potential impacts and the approach to managing them;
- Feedback form - highlighting the specific matters on which the Applicant was seeking feedback;
- Consultation Feedback Reports – which explained how the feedback received during the Stage 1 and 1b non-statutory consultations had been taken into account; and
- Environmental assessments - Comprising the PEIR and supporting documents.

11.4.9 If Stakeholders required further information during the consultation period, they were able to visit one of the eight consultation events, where members of the project team were able to answer questions on a range of topics related to the Proposed Development.

11.4.10 Other opportunities to seek clarification on any of the information included a dedicated email address, telephone line, the Proposed Development's website and



events where staff were available to answer questions. To support people whose first language was not English, consultation documents were available in other languages on request. This information was provided within the SoCC at paragraph 4.6.22 and was also referenced on the Project website.

- 11.4.11 In response to the feedback received the Applicant has reviewed and updated its environmental assessments and other supporting documentation. These are submitted in support of the DCO Application.

Consultation Events

- 11.4.12 As part of its preparation for the Stage 2 Statutory Consultation, the Applicant engaged with the host local authorities on a draft of the SoCC. Feedback was sought on the approaches proposed (including the number and locations for the consultation events) in order to draw upon the host local authorities expertise of consulting people in the local area.
- 11.4.13 Eight public exhibition events were held at a variety of venues within the consultation zone, including in and around Wisbech. The events were attended by members of the project team who were on hand to answer questions. Copies of all consultation materials were also available for inspection and laptops were made available for consultees to access the project website.
- 11.4.14 Recognising that not all consultees may be able to attend public exhibitions during normal working hours the Applicant timed the majority of its events during the week to run from 1400 to 2000. In addition, an event was also held on Saturday 17 July to provide an additional opportunity for Stakeholders that could not attend during the week to attend an event. An online consultation exhibition was provided within the Project website during the consultation period for those unable to attend the physical events.
- 11.4.15 During the Stage 2 Consultation, feedback was received highlighting that events should have been held within Kings Lynn, West Lynn and Clenchwarton. These locations were outside of the identified consultation zone for the Proposed Development, as agreed by the host local authorities and no requests for events in these locations were requested from the Host authorities during the consultation on the draft SoCC. As the Proposed Development was not considered to have significant direct or indirect effects in these locations, either permanently or temporarily, the Applicant considered that additional events were not justified.

Consultation Feedback

- 11.4.16 In line with the requirements of Section 47 of the Planning Act 2008 the Applicant engaged with the host local authorities on a draft of the SoCC. As part of this process, feedback was sought on the approaches proposed, the timing and duration of the consultation in order to draw upon the host local authorities expertise of consulting people in their local area. Comments from the host local authorities on the draft SoCC were considered and taken into account in the preparation of the final SoCC as published. The Stage 2 Statutory Consultation took place in



accordance with the SoCC and evidence of this compliance is presented in **Chapter 5** of this Report.

- 11.4.17 In response to feedback received, the Applicant has reviewed and updated its proposals. Whilst minor changes have been made the Applicant does not consider that any changes are sufficiently material so as to require any further stages of consultation prior to the submission of the DCO Application. As part of the DCO Application the Applicant has reviewed and updated its environmental assessments and other supporting documentation. There is a further opportunity for Stakeholders to comment on the Proposed Development during the examination of the Application by the examining authority. Once the Application has been accepted by the Planning Inspectorate, consultees can register through the PINS website to get involved in the Examination as an Interested Party.
- 11.4.18 The Applicant noted responses requesting that the facts and benefits of the Proposed Development be better communicated. More information on the socio-economic benefits and education opportunities presented by the Proposed Development are provided in the **Outline Community Benefits Strategy (Volume 7.14)** which will be submitted as part of the documents included in the DCO submission.

Consultation Suggestions

- 11.4.19 The Stage 2 Statutory consultation took place in accordance with the Planning Act 2008, to share how the Proposed Development has developed and to obtain feedback on the proposals. The consultation commenced on the 28 June 2021 and ran until 13 August 2021, a period of over seven weeks. Eight public consultation events took place at a variety of venues in and around Wisbech, with five document inspection venues where full sets of consultation documents were available in hard copy for consultees to review. A full set of consultation documents was also available to download free of charge from the Applicants project website.
- 11.4.20 Feedback received suggested that there should be further consultation prior to submission of the DCO Application. Whilst minor changes have been made the Applicant does not consider that any changes are sufficiently material so as to require any further stages of consultation prior to the submission of the DCO Application. As part of the DCO Application the Applicant has reviewed and updated its environmental assessments and other supporting documentation. There is a further opportunity for Stakeholders to comment on the Proposed Development during the examination of the Application by the examining authority. Once the Application has been accepted by the Planning Inspectorate, consultees can register through the PINS website to get involved in the Examination as an Interested Party.

Consultation Website

- 11.4.21 Responses were received during the Stage 2 Statutory Consultation which considered that the website did not contain sufficient information and that there was an over reliance on the website as a source of information for the consultation. The



Applicant employed a number of methods by which information on the Proposed Development could be disseminated and made available to the consultees.

11.4.22 Alongside the provision of documents and information on the Project Website, hard copy documents were provided at publicised inspection points and were also available at each of the eight public exhibitions, all of which were within the consultation zone. At each of the exhibitions, members of the project team were available to answer any questions or alternatively consultees could call the project contact point (local rate telephone number) and request documents to be sent to them.

11.4.23 The website was developed as an aid to consultation. It included all the information which was made available at the public exhibitions and included the PEIR which contained a significant amount of environmental data. The website also included the short films and videos to provide information to a range of audiences to supplement the consultation booklet and supporting documentation which was available.

Materials and information requests

11.4.24 Comments received from consultees during the Stage 2 Statutory Consultation requested more information on the proposed community workshops as well as requesting when information on the supporting developments would be provided. The Applicant considers that Local Liaison Committees will be an effective mechanism to establish two way, constructive dialogue with the community of Wisbech. The Applicant has successfully established liaison committees at its other facilities for this purpose.

11.4.25 The Applicant has outlined its intentions to establish the Local Liaison Committee and has asked consultees to identify where they have an interest in participating. The Local Liaison Committee for the Proposed Development would be established following the acceptance of the DCO Application by the SoS.



12. DCO, Design and Planning

12.1 Introduction

12.1.1 As part of the Stage 2 Statutory Consultation, the Applicant sought feedback in relation to the design of the Proposed Development, its impacts and the mitigation measures proposed to reduce the impacts of the Proposed Development on the local environment and community.

12.1.2 This chapter provides a summary of the relevant DCO, Design and Planning consultation feedback received from prescribed consultees, local authorities, members of the public and wider Stakeholders grouped under the following headings:

- National Policy Statements;
- Other Policy and Guidance;
- Location of the Proposed Development;
- Support for Principle of the Proposed Development; and
- Objection to Principle of the Proposed Development.

12.1.3 Where comments have not been received under the headings above, these have been removed to reflect this. The issues raised by respondents have also been grouped in table form at **Appendix JJ** (Table 5.1), which includes the Applicant's response.

12.2 Section 42 Consultees

Local Authorities

Other Policy and Guidance

12.2.1 CCC said that it was satisfied that the description of the development set out within Chapter 3 of the PEIR complied with the requirements of Schedule 4 of the EIA Regulations. It made a number of suggestions that the Applicant should consider, these comprised:

- That there should be wider consideration of local policy, with all relevant policies within the Minerals and Waste Local Plan (MWLP) given appropriate consideration.
- There should be consideration of the aims and objectives of the Cambridgeshire and Peterborough Minerals and Waste Local Plan 2036, to ensure the Proposed Development is in accordance with these strategic objectives.



- A Health Impact Assessments (HIA) methodology should be used for the Health Chapter of the ES to ensure the Proposed Development is in accordance with the requirements of the FDC Local Plan.
- Demonstration within the ES of how the Proposed Development would meet the requirements of Policy 18 of the Cambridgeshire and Peterborough Mineral and Waste Local Plan which requires developments to be integrated with neighbouring development and must not result in adverse impacts on the amenity of existing occupiers.

12.2.2 CCC also raised concerns that the Proposed Development may not receive the expected fuel levels needed to operate, as it considered that legislation continues to trend towards ever increased recycling, re-use, and reduction of waste. It suggested that this could result in less waste being sent to landfill over the lifetime of the Proposed Development.

12.2.3 KLWN raised concern that the Proposed Development would not be in accordance with the National Waste Strategy as the Proposed Development would likely contribute to incineration overcapacity.

12.2.4 Peterborough City Council requested that the Proposed Development should take into consideration the aims and objectives of the Cambridgeshire and Peterborough Minerals and Waste Local Plan 2036 such that the strategic policies of the plan are met.

Location of the Proposed Development

12.2.5 FDC expressed concern about the location of the Proposed Development as they considered that it would be incongruous with the surrounding landscape and built environment. The Council said that the location of the Proposed Development was inappropriate due to its proximity to local residential areas, businesses, schools, and important agricultural land. It also suggested that the Proposed Development was located too far from grid connections.

12.2.6 KLWN said that the Proposed Development is sited within a deprived ward which could experience considerable adverse effects from the Proposed Development. They further suggested that there should be a public inquiry about the Proposed Development.

12.2.7 NCC advised that the area of land contained within the Proposed Development redline boundary in Norfolk is not within a Mineral Safeguarding Area of a Mineral Consultation area. They also advised that the area of land contained within the Proposed Development redline boundary in Norfolk is also not within the safeguarding area or consultation area for a safeguarded waste management facility, safeguarded water recycling centre, safeguarding mineral extraction site or safeguarded mineral infrastructure as detailed in the Norfolk Minerals and Waste Core Strategy Policy CS16.



Objection to Principle of the Proposed Development

- 12.2.8 Bedford Borough Council and Central Bedfordshire Council highlighted that the Bedfordshire MWLP is unlikely to have a shortfall of waste treatment options, as predicted by the Draft Waste Fuel Availability Report. They advised that this is due to the Rookery South ERF Project, serving the Bedfordshire area and fulfilling its waste management needs.
- 12.2.9 Cambridgeshire and Peterborough Combined Authority objected to the Proposed Development due to its effects on local communities and not conforming with their three C's; Compassion, Co-operation and Community.
- 12.2.10 CCC raised a number of points relating to the DWFAA, these included:
- The Study Areas used in the DWFAA and the policy considerations in Chapter 5 of the PEIR did not match. It requested that Chapter 5 of the PEIR consider policies from a much wider area to ensure parity between the documents;
 - The DWFAA did not identify other existing or proposed waste recovery facilities. It suggested that information identifying if and where surplus or deficit waste recovery capacity exists should be included within the Assessment.
 - The DWFAA should clearly state whether the double-counting of transfer movements within the Waste Data Interrogator has been included and provide an indication of the level of error this introduces or make an allowance for it.
 - The DWFAA should provide an analysis of the composition of the potential feedstock and the most sustainable use for this form of material.
 - The DWFAA should consider how the composition of waste in the future would affect the viability of the Proposed Development.
 - The DWFAA identifies all Household, Industrial and Commercial (HIC) waste that would be landfilled as suitable for incineration but does not consider potential changes in the quantity and composition of HIC waste resulting from existing and future policy drivers.
 - The DWFAA identifies HIC waste but does not explain clearly how this has been calculated. It said that 1 million tonnes of the 3.5 million tonnes of HIC waste identified would be recycled instead of incinerated due to the 2035 target for recycling being 65%, a 20% increase in current municipal solid waste recycling.
 - The DWFAA considers existing incinerator capacity within its Study Area however CCC suggested that approximately 287,000 tonnes of unutilised incinerator capacity within this area.
 - The DWFAA only considers proximity in relation to the export of RDF.
 - The DWFAA does not currently provide details of waste sorting methods and destinations, which was requested by King's Lynn and West Norfolk Council during engagement.
 - The 'without Proposed Development' scenario within the DWFAA did not consider the growing requirement to re-use, recycle, and reduce waste, but used



data that assumed current levels of waste are maintained in the future. CCC said that the final Assessment should take this into account to provide a more realistic account of waste management needs in the future.

- The final WFAA should establish how the Proposed Development would contribute to the Waste Planning Authority's proximity considerations regarding HIC residual waste given the source will form the majority of fuel supply.

12.2.11 CCC expressed concern that the heat network did not seem to be an integral part of the Proposed Development. They said that until this element was given greater consideration and explanation, the Proposed Development could not be considered to be a recovery operation and that Refused Derived Fuels would continue to be managed by the nearest appropriate waste installation. It also suggested that there is sufficient incinerator capacity within the Study Area, and existing Refused Derived Fuels handling facilities might be closer than the Proposed Development.

12.2.12 FDC expressed concern that the Proposed Development would result in Wisbech and its surroundings becoming a 'dumping ground' for waste transported into the area from other local authorities.

12.2.13 KLWN, objected to the Proposed Development.

Prescribed Consultees

National Policy Statements

12.2.14 Wisbech Town Council said that there was no current justification for the Proposed Development, as they considered that it would result in compromising local waste management targets, which they suggested would be contrary to National Policy Statement EN-3.

Other Policy and Guidance

12.2.15 The EA said that the EP and DCO applications should be tracked and considered in parallel to enable them to identify key issues and provide resolutions for both efficiently. It also requested that the Applicant arrange a pre-application meeting with the National Permitting Service and Area Compliance Officers to ensure that design requirements are known and permitting can be considered.

12.2.16 National Grid advised that a Deed of Consent should be acquired if the Proposed Development crosses the National Grid gas pipeline easement.

Location of the Proposed Development

12.2.17 Emneth Parish Council said that the location of the Proposed Development was inappropriate due to its proximity to local residential areas, schools, and health care providers. It raised concerns that the Proposed Development would be close to the main drain serving the local area.



- 12.2.18 Natural England welcomed the approach taken to the site selection process, Grid Connection route options and solutions as set out in Chapter 2: Alternatives of the PEIR.
- 12.2.19 Wisbech Town Council suggested that the alternative locations considered within paragraph 2.2.10 of the Scoping Report should be further considered and compared against the current location, with greater justification given for the current siting of the Proposed Development. It also raised concerns that the essential siting criteria did not give due consideration to the proximity to waste fuel and was skewed towards 'the Algores Way site', which they considered to render the site selection process unfair and inadequate. The Town Council further expressed the view that there had been no genuine search for alternate sites and that the supporting information provided did not adequately demonstrate the need for the Proposed Development at the proposed location.

Objection to Principle of the Proposed Development

- 12.2.20 Emneth Parish Council and Wisbech Town Council objected to the Proposed Development.
- 12.2.21 Network Rail objected to the Proposed Development due to concerns that it would conflict with the potential future use of the adjacent disused March to Wisbech Railway. It highlighted a lack of formal engagement and suggested that insufficient assurance was provided by the Applicant that the Proposed Development would not inhibit future use of the disused March to Wisbech Railway.
- 12.2.22 Wisbech Town Council commented that there is no current requirement for a facility capable of treating an additional 0.6256mtpa in this location, as that this amount is above the surplus for waste management capacity of 0.495mtpa for 2036. It further identified that due to this, a considerable amount of waste would have to be transported into the local area from large distances in order to supply the Proposed Development. The Council raised concern that a shortfall of non-landfill HIC residual waste management capacity quoted in the PEIR does not consider surplus capacity identified in a number of authorities within the catchment area. It also expressed dissatisfaction that the PEIR did not consider an assumption that recycling rates would increase in the area.
- 12.2.23 The Council advised that identified waste from Hertfordshire was unlikely to be supplied in practice as the current Hertfordshire Draft Local Plan commits the area to net self-sufficiency by 2036 and a move towards zero avoidable waste. It said that there was no identifiable need for the Proposed Development and suggested that it did not take account of waste management policies and waste reduction performance of local authorities identified as likely supplying the Proposed Development.
- 12.2.24 The Council further commented that the pre-application information submitted was insufficient and failed to show that there would be no adverse effects on the following local elements: the local highway network, the visual amenities of the historic backdrop of Wisbech, health and well-being, air quality, local biodiversity, and flood risk.



- 12.2.25 The Council suggested that the data that underpinned the DWFAA was outdated and said that identified capacity gaps, such as those for NCC, have been filled since the document's production.

12.3 Persons with an interest in land (PILs)

Location of the Proposed Development

- 12.3.1 A PIL said that the location of the Proposed Development was not acceptable as it would have considerable effects on local landscape, particularly the small town of Wisbech and the surrounding Cambridgeshire Fens.
- 12.3.2 A PIL identified that the Proposed Development was partially sited on land to be developed for a consented battery energy storage system installation. They stated that they plan to submit a further application to take more land in the area, which would further compromise the Proposed Development. They requested that the red line boundary (Order limits) be amended to remove the areas of Model Farm. Another consultee suggested that land in the area owned by FDC should be compulsory purchased.
- 12.3.3 Further comments received from PILs advised that consultation was needed with all telecommunications, broadband and utility providers to ensure the siting of the Proposed Development would not compromise infrastructure assets.

Objection to Principle of the Proposed Development

- 12.3.4 Some PILs expressed general objections to the Proposed Development, while others cited a perceived lack of need for the Proposed Development and unsuitability to the local area. A PIL added to their objection that if the Proposed Development went ahead, strict requirements should be applied to protect locals' health, the natural environment, and the health of local workers.
- 12.3.5 An agent acting on behalf of a PIL requested more information on how the Proposed Development would affect their client's property and operations.

12.4 Section 47 Consultees

Members of the public

National Policy Statements

- 12.4.1 Members of the public raised concern that the amount of energy generated by the Proposed Development had been maximised or inflated to reach the threshold for classification as a NSIP and achieve consent through a DCO. They said that the Applicant had selected to pursue this process to avoid the local planning process and consulting with local communities. Others said that the Applicant had opted to use the DCO process to avoid the rejection experienced by a similar energy-from-waste facility in King's Lynn. Respondents also questioned how the Proposed



Development could be consented when the relevant Local Authority was not determining the application.

- 12.4.2 A respondent raised their concern about future national policies that will reduce the volume of municipal waste available for the size of the proposed facility through a greater emphasis on reuse and recycling.

Other Policy and Guidance

- 12.4.3 Members of the public raised concerns that the Proposed Development contradicted WHO guidelines on the siting of energy-from-waste developments. Several respondents expressed concerns that the Proposed Development would not be in accordance with existing and pending environmental legislation and guidance due to potential adverse impacts. One respondent suggested that the Proposed Development would be contrary to the National Planning Policy Framework (NPPF).
- 12.4.4 Respondents also questioned how the Proposed Development could be in accordance with national and local waste policies such as the local Neighbourhood Plan and CCC's waste policies that aimed to increase recycling rates and reduce waste generation.
- 12.4.5 A member of the public requested further information to evidence the Applicant's claim that the intended site had been designated for waste-related development.

Location of the Proposed Development

- 12.4.6 Members of the public said that the Proposed Development was not suitably located and should not be developed near to Wisbech. Members of the public who shared this view did so for a range of reasons, these included:
- Proximity to schools, businesses and residential areas;
 - Perceptions of Wisbech being an area of deprivation with low levels of educational achievement;
 - The disproportionate size of the Proposed Development in comparison to Wisbech and the surrounding area;
 - The location of the Proposed Development on flood plain;
 - The Proposed Development would further exacerbate the housing crisis in Wisbech by using up land that could be provided for housing; and,
 - Site components would need to be delivered during the night and that lampposts would have to be temporarily removed to accommodate the required components and vehicles.
- 12.4.7 Other respondents did however consider the siting of the Proposed Development on an industrial estate to be appropriate.
- 12.4.8 Many respondents said that the Proposed Development should be sited elsewhere, including rural and coastal areas away from residential areas, schools, and



businesses, while others suggested that it be sited closer to large cities such as Peterborough to process waste at source.

12.4.9 Further suggestions included areas closer to existing transport infrastructure and connections such as rail freight lines, dual carriageways, and motorways or that the Proposed Development should be located closer to the chosen substation to reduce the impact of the Grid Connection.

12.4.10 Some members of the public said that the location for the Proposed Development is irrational due to being located at the edge of the intended catchment area for waste supply and should be situated to better serve areas of demand.

12.4.11 Some respondents requested more information on how the site selection process for the Proposed Development was undertaken, including how other sites were considered and what criteria lead to their discounting.

Support for Principle of the Proposed Development

12.4.12 Some members of the public expressed general support for the Proposed Development. Others cited the environmental benefits of diverting waste from landfill, the economic benefits of increased employment opportunities, and the generation of energy and heat as reasons for their support.

Objection to Principle of the Proposed Development

12.4.13 Many members of the public expressed general objection to the Proposed Development. These objections were often made without providing further information. Other objections to the Proposed Development included:

- The principle of the energy-from-waste and the environmental impacts of the proposals;
- Impacts on local communities, including on physical and mental health and well-being;
- A lack of demand/need for the Proposed Development due to increased recycling rates, and compliance with national and local waste strategies and policies;
- Increased air pollution from carbon dioxide and toxic emissions from the energy-from-waste processes;
- Use of waste materials that could otherwise be re-used or recycled;
- Use of compulsory purchase to acquire land for the Proposed Development, and compulsory access permits to facilitate the Grid Connection;
- Lack of meaningful benefits to local communities and businesses;
- Insufficient measures to mitigate impacts on local communities and the environment;
- Increased traffic congestion and HGV movements on local roads; and



- The ability to comply with national and local carbon reduction targets.

- 12.4.14 A member of the public requested further information on how the cost of the Proposed Development compared with the costs for developing a wind or solar farm of a similar scale. Another suggested that the estimated capacity of the Proposed Development is equivalent to 18 three-megawatt wind turbines, which they said was a fraction of the cost and preferable to the Proposed Development.
- 12.4.15 Some respondents raised concerns about the height of the chimneys, including that they could threaten activities undertaken by the RAF in the area. Others said that the chimneys should be made higher to aid the dispersal of emissions and particulates. A respondent said that the required aviation lighting on the chimneys would likely create light pollution in the local area whilst another questioned why two chimneys were required when previous designs only showed one.
- 12.4.16 Members of the public raised concern that similar facilities in other nations had resorted to importing waste to continue operating due to increased recycling rates and suggested the Proposed Development may need to do similar due to the proliferation of waste reduction and recycling strategies in the UK. One respondent highlighted the high recycling rate within Cambridgeshire indicating that this could limit local waste supply to the Proposed Development.
- 12.4.17 A respondent shared concern that the aim of the Proposed Development was to create expensive construction contracts and that the Applicant would later sell the site, leaving the area with a 'white elephant'. Another respondent similarly suggested that processes and timescales for the decommissioning of the facility be confirmed, including provisions for if the Applicant went into liquidation.
- 12.4.18 Further responses received questioned the need case for the Proposed Development as there was no demand for waste to be treated locally or for the energy produced.

Businesses and Community Groups

Objection to Principle of the Proposed Development

- 12.4.19 Commercial Safety Systems Ltd, Engineering & Factory Supplies Ltd, English Brothers Ltd, Icon Engineering Ltd, Kirk Coachworks, MJ Acoustics, The Sportsman Pub, WEP Fabrications Ltd and William H Brown/Sequence (UK) Ltd all objected to the Proposed Development due to concerns about air quality impacts, and the proximity of the site to agricultural industry and local communities and businesses.
- 12.4.20 Elm Road Primary School and Nene and Ramnoth School objected to the Proposed Development due to impacts on local communities, economy, the environment and local road infrastructure during construction and operation.
- 12.4.21 The Sportsman Pub raised concerns about adverse impacts from the Proposed Development on local villages, conservation areas, and nearby schools.



Community Groups

Other Policy and Guidance

- 12.4.22 CPRE said that the Proposed Development was not in accordance with national and local policies aimed at ceasing the transshipping of waste between local authorities and encouraging the use of renewable energy in waste developments, including a potential breach of Policy 3 of the adopted Minerals and Waste Plan.
- 12.4.23 CPRE further advised that the Proposed Development would not be in keeping with Policy 1 of the adopted Mineral and Waste Plan and Fenland Local Plan Policies LP2, LP3, LP6, LP8, LP13, LP16 and LP18.

Location of the Proposed Development

- 12.4.24 English Brothers Ltd raised concern that the area is one of the most deprived in the UK and that the Proposed Development would not help reduce deprivation locally.
- 12.4.25 Fascinating Fens said that the location of the Proposed Development was not appropriate due to the size of Wisbech and its effects on local heritage assets. It also said that the required chimneys would exceed the height of historic assets within the Fens such as Ely Cathedral West Tower and the Wisbech Clarkson which can be seen from considerable distances.
- 12.4.26 Icon Engineering Ltd and The Sportsman Pub said that the location of the Proposed Development was not appropriate and that it should be located with better transport links. MJ Acoustics and WEB Fabricators Ltd also said that the location was unsuitable due to Wisbech being a small town, and the proximity of the site to local residential areas, businesses, schools, and important agricultural land.

Objection to Principle of the Proposed Development

- 12.4.27 CPRE and Wisbech and March and District Trades Union Council objected to the Proposed Development due to impacts on local communities, economy, the environment and local road infrastructure during construction and operation.
- 12.4.28 CPRE said that waste should be managed higher up in the waste hierarchy through anaerobic digestion and plastic re-use and re-processing. It considered these methods to be more sustainable and environmentally friendly for the handling of combustible organic materials. It also raised concern that there was no commitment that the local authorities listed in the DWFAA would supply waste for the Proposed Development if consented.
- 12.4.29 Commercial Safety Systems Ltd, Engineering & Factory Supplies Ltd, English Brothers Ltd, Icon Engineering Ltd, Kirk Coachworks, MJ Acoustics, The Sportsman Pub, WEP Fabrications Ltd and William H Brown/Sequence (UK) Ltd all objected to the Proposed Development due to concerns about air quality impacts, and the proximity of the site to agricultural industry and local communities and businesses.



- 12.4.30 Elm Road Primary School and Nene and Ramnoth School objected to the Proposed Development due to impacts on local communities, economy, the environment and local road infrastructure during construction and operation.
- 12.4.31 The Sportsman Pub raised concerns about adverse impacts from the Proposed Development on local villages, conservation areas, and nearby schools.

Wider Stakeholders

National Policy Statements

- 12.4.32 Steve Barclay MP said that the Proposed Development was not in accordance with National Policy Statements EN-1 and EN-3 and their principles for good design and paragraph 2.5.2 of EN-3 and the waste hierarchy. He sought clarity on whether the Applicant had obtained independent advice or design review as recommended by paragraph 4.5.6 of EN-1. Alongside this, he requested information on the design and site selection process.
- 12.4.33 The MP also expressed concern that the Proposed Development did not comply with EN-1 and its recommendations regarding Combined Heat and Power (CHP) due to the proposed Grid Connection having to cross land controlled by Network Rail and the CHP being undeliverable based on the currently provided evidence.
- 12.4.34 He suggested that the Applicant consider the guidance provided by the National Infrastructure Committee regarding good design and its principles of climate, people, places, and value.

Other Policy and Guidance

- 12.4.35 Cambridge Friends of the Earth said that the Proposed Development was not in accordance with national and local policies aimed at ceasing the transshipping of waste between local authorities and encouraging the use of renewable energy in waste developments, including a potential breach of Policy 3 of the adopted Minerals and Waste Plan.
- 12.4.36 Fenland and West Norfolk Friends of the Earth said that the location of the Proposed Development was not suitable due to its proximity to local residential areas, businesses, schools, and important agricultural land.
- 12.4.37 Steve Barclay MP said that the Proposed Development does not accord with the NPPF and the recommendations of the UK's Sixth Carbon Budget. He said that the Proposed Development is incompatible with the assumptions for Energy from Waste and the future management of waste that were established within the UK's Sixth Carbon Budget. He also considered that the business case for the Proposed Development was questionable as it would need to acknowledge a far lower proportion of available waste fuel in order to align with the assumptions of the Sixth Carbon Budget recommendations.
- 12.4.38 He considered that the Proposed Development was unlikely to receive consent due to it not complying with planning and climate change policies. He also said that the



PEIR was incomplete as it did not contain a sufficient project description and was not in accordance with the Schedule 4 of the EIA Regulations.

- 12.4.39 The MP also said that the Applicant had not demonstrated sufficient need for the Proposed Development and suggested that it was not consistent with the principles of proximity and self-sufficiency set out in the Waste Regulations 2011 and the associated waste hierarchy. He considered that the DWFAA was incomplete and not in accordance with the waste hierarchy which prioritises other cleaner methods of waste management and questioned the figures used for calculating the energy produced from the incineration of waste and considered them inaccurate.

Location of the Proposed Development

- 12.4.40 Liz Truss MP said that the Proposed Development was sited in an area at risk of flooding and known to have flooded in the past. She also said that the Proposed Development was sited too close to local schools, residential areas, businesses, and important agricultural land. Steve Barclay MP expressed similar views and said that it is located away from major road infrastructure to support the required additional HGV movements.
- 12.4.41 Nordelph Parish Council said that the location of the Proposed Development was inappropriate due to its proximity to local residential areas, schools, and health care providers. It raised concerns that the Proposed Development would be close to the main drain serving the local area, which it highlighted should not be compromised.

Objection to Principle of the Proposed Development

- 12.4.42 Cambridge Friends of the Earth and Fenland and West Norfolk Friends of the Earth objected to the Proposed Development due to impacts on local communities, economy, the environment and local road infrastructure during construction and operation.
- 12.4.43 Cambridge Friends of the Earth considered that the Proposed Development would impact CCC's ability to meet its recycling and waste reduction commitments or conform with the waste hierarchy. It also said that the County Council's ability to create a circular economy would be adversely impacted by the Proposed Development and suggested that other waste and energy infrastructure would better promote the re-use and recycling of waste.
- 12.4.44 Fenland and West Norfolk Friends of the Earth objected to the principle of the energy-from-waste process as it would result in the loss of valuable materials that could be otherwise recycled. It also said that the Proposed Development would hamper local and National efforts to improve waste reduction and that the energy generated would be too inefficient to make the Proposed Development an effective energy source.
- 12.4.45 Liz Truss MP and Steve Barclay MP shared their objections to the Proposed Development. Steve Barclay MP justified his objection on the basis that the adverse impacts of the Proposed Development outweigh its potential benefits.



- 12.4.46 Nordelph Parish Council and South Wootton Parish Council objected to the Proposed Development.
- 12.4.47 South Wootton Parish Council questioned the purpose of the Proposed Development as it considered that waste should be dealt with through recycling, reducing waste produced and re-use. It said that the Proposed Development would perpetuate an outdated need to burn resources that could otherwise be re-used or recycled.
- 12.4.48 Steve Barclay MP suggested that the assumptions in the DWFAA regarding source local authorities contradicted the proximity principle, as he considered that the twelve authorities listed did not satisfy the requirement to treat waste as locally as possible. He suggested that the Applicant develop a business case for the Proposed Development that aligns with the proximity principle and waste hierarchy to avoid compromising waste that could have been recycled or managed through other waste recovery methods.
- 12.4.49 Steve Barclay MP raised concern that demand for heat produced by the Proposed Development had not been identified and that the Applicant had not established commercial contracts that would utilise this heat.
- 12.4.50 Steve Barclay MP said that the SoS has already determined that there is no longer a national need for large new incinerators as demand has already been met. He suggested that the Proposed Development is unlikely to receive consent due to the recent refusal of the Kemsley North Waste to Energy Project, the presence of alternative sites and project configurations, and preference for other waste management solutions like increased plastic recycling.
- 12.4.51 He questioned how the Applicant would be able to sustain a case for compulsory purchase when a sufficient need case had not been identified and alternatives not adequately considered.

12.5 How feedback has influenced the DCO application

- 12.5.1 As outlined above, a range of comments were received from consultees in relation to the construction of the Proposed Development. A summary of how feedback has been taken into account in the preparation of the DCO application is provided below with full details of the feedback received and the Applicant's response presented in tabular format in **Appendix JJ** (Table 5.1).

National Policy Statements

- 12.5.2 The National Policy Statements, principally NPS EN-1 and EN-3 explain that there is an urgent need for energy development, recognising in the case of EfW facilities that the production of energy is secondary to the principal purpose of handling and processing waste. In response to feedback received as part of the Stage 2 Statutory Consultation, the Applicant has revised and updated the **Waste Fuel Availability Assessment (WFAA) (Volume 7.3)** and the Study Areas considered within it. The **WFAA (Volume 7.3)** concludes that there is a need for additional residual waste management capacity and especially capacity that offers an alternative to landfill.



- 12.5.3 The Applicant is aware of current and future policies and commitments to reduce the amount of waste generated by society through reduction, reuse and recycling. The policies have been factored into the assessment of future waste arisings as reported within the **WFAA (Volume 7.3)**. This document accounts for potential future reductions in the volume of municipal waste and concludes that there remains a need for the Proposed Development.
- 12.5.4 The Applicant has considered government advice on what it considers constitutes good design in the context of energy infrastructure. This is set out within NPS EN-1 and EN-3. The Applicant has also given consideration to the guidance provided by the National Infrastructure Committee regarding good design. The Applicant has explained how the design of the Proposed Development has evolved and includes the alternatives which have been considered within **ES Chapter 2: Alternatives (Volume 6.2)**. It has also produced a **Design and Access Statement (Volume 7.5)** which references the relevant NPS policy guidance. In response to the feedback received, the Applicant has revisited the architecture of the EfW CHP Facility which has involved consideration of different cladding materials. It has also further developed designs for the Administration building which now include sustainability measures such as solar panels, rainwater recycling, sections of green wall and a brown roof (both of which provide ecological habitat).
- 12.5.5 NPS EN-1 paragraph 4.5.5 states that Applicants and the IPC (now PINS) should consider taking independent professional advice on the design aspects of a proposal. The design process for the Proposed Development has been informed by the technology type, by comments received at non-statutory and statutory consultation, and through the appointment of professional designers (architects). Whilst the Applicant did not seek an external design review outside of the consultation process it has responded to consultation comments received and has evidenced and explained the design for the EfW CHP Facility within the accompanying **Design and Access Statement (Volume 7.5)** and within **ES Chapter 2: Alternatives (Volume 6.2)**. This latter document also explains how the site was identified as appropriate for the use proposed.
- 12.5.6 NPS EN-1 requires that any thermal power station seeking consent should include for CHP or be CHP ready but this requirement does not extend to renewable energy facilities such as the Proposed Development. Nevertheless, the Applicant is seeking consent for a CHP Connection and is in discussion with Network Rail to be able to use part of the disused March to Wisbech Railway corridor. The Proposed Development also includes a Grid Connection to enable the export of electricity to the national grid. The design of this connection has been modified as a result of Stage 2 Statutory Consultation.

Other Policy and Guidance

- 12.5.7 The **Planning Statement (Volume 7.1)** considers relevant national and local policy and the performance of the Proposed Development against such policy. This includes an assessment of compliance against the adopted Cambridgeshire and Peterborough Minerals and Waste Local Plan 2036. Policy 18 of the Plan requires developments to be integrated with neighbouring development which must not result in adverse impacts on the amenity of existing occupiers. Information in the form of



the environmental assessments necessary to understand the potential for effects upon amenity is reported within the ES and performance against Policy 18 commented upon within the Planning Statement.

- 12.5.8 The Applicant has undertaken an assessment of the potential for impacts upon health and this is reported within ES **Chapter 16: Health (Volume 6.2)**. Stage 2 Statutory Consultation included a request that a Health Impact Assessment (HIA) methodology should be used in accordance with the requirements of the FDC Local Plan. The methodology adopted by the Applicant for the consideration of health has been informed by and agreed via consultation with CCC, KLWN, NCC and the former PHE.
- 12.5.9 In response to comments received requesting that the EP and DCO applications be tracked and considered in parallel, the Applicant can confirm that it intends to submit the permit application within approximately one month following the submission of the DCO. In this context, the Applicant has engaged with the appropriate officers at the EA.
- 12.5.10 Guidance has been received from relevant statutory undertakers regarding works which may have the potential to affect existing assets and services. As a result of changes to the Proposed Development subsequent to Stage 2 Statutory Consultation it has been confirmed with National Grid that its infrastructure will not be affected. Meetings have also been held with relevant utility providers to understand how the Proposed Development would interact with their assets and to identify the need or otherwise for protective provisions to be incorporated within the draft **DCO (Volume 3.1)**.
- 12.5.11 WHO guidelines on the siting of energy-from-waste developments were referenced in responses received at Stage 2 Statutory Consultation along with existing and pending environmental legislation and guidance. The Applicant has reviewed the guidelines and relevant policy guidance contained within NPS EN-1, EN-3 and EN-5. The Applicant is satisfied that the Proposed Development is consistent with the NPSs and with the draft NPS's published in 2021. This is explained and demonstrated within the **Planning Statement (Volume 7.1)**. The WHO guidelines are understood to refer to hospital incinerators.
- 12.5.12 Comments were received suggesting that the Proposed Development would be contrary to the NPPF. The NPPF is not the primary policy for the consideration of the application however consideration has also been given to compliance with the NPPF with relevant policies identified within the ES topic chapters and a policy assessment has been undertaken and is reported within the **Planning Statement (Volume 7.1)**.
- 12.5.13 A request was received for the Applicant to evidence that the intended site for the EfW CHP Facility had been designated for waste-related development. In response, the Applicant can confirm that the site was designated for waste purposes by CCC in the former minerals and waste local plan. In the latest version of the Cambridgeshire and Peterborough Minerals and Waste Local Plan (July 2021) which was adopted subsequent to the identification of the site by the Applicant, it is shown as a waste management area. Further information on relevant policy



applicable to the EfW CHP Facility site identification within the adopted local plan is contained within the **Planning Statement (Volume 7.1)**.

- 12.5.14 Comments received identified a number of local planning policies within the adopted Minerals and Waste Local Plan (July 2021) and Fenland Local Plan (2014). These are Policy 1 of the former and policies LP2, LP3, LP6, LP8, LP13, LP16 and LP18 of the latter. The Applicant has provided the environmental information necessary to consider compliance or otherwise with these policies within the ES and it has sought to assess the performance of the Proposed Development against relevant local plan policies within the **Planning Statement (Volume 7.1)**.
- 12.5.15 The Applicant has considered the difference in approach between the draft WFAA presented at Stage 2 Statutory Consultation and ES **Chapter 5: Legislation and Policy (Volume 6.2)** and the different approaches to planning policy. It notes that the consideration of local policy in the draft WFAA was undertaken in order to inform the Study Area relevant to the potential importation of waste. As such it fulfilled a different purpose to the more refined policy assessment which is now presented within ES **Chapter 5: Legislation and Policy (Volume 6.2)**. This instead considers policy relevant to the consideration of the Proposed Development i.e., national policy and the planning policy of the host local planning authorities.
- 12.5.16 The Applicant recognises that the location of the Proposed Development is in proximity to local businesses and that there are schools and residential areas within some of the Study Areas adopted by the environmental assessments. The ES considers the potential for significant effects across a range of environmental topics and identifies mitigation measures where these would remove the potential for significant effects. The document will be submitted with the application and will be used to inform the SoS's decision.
- 12.5.17 As part of the environmental assessment, the Applicant has modelled the potential emission savings which would result from the operation of the Proposed Development over a 'do nothing' alternative of landfill. The assessment has considered the effects arising from the operation of the Proposed Development relative to the UK's Sixth Carbon Budget and found that it would be compatible with it and with UK Government targets to reduce carbon emissions. The **Planning Statement (Volume 7.1)** which accompanies the application considers how the application performs against relevant policy and concludes that it is consistent and that as such, consent should be granted.
- 12.5.18 Comments received at Stage 2 Statutory Consultation stated that the PEIR was incomplete and did not contain a sufficient project description. As such it was considered to not be in accordance with the Schedule 4 of the EIA Regulations. The PEIR Chapter 3 described the Proposed Development as it was understood at that time. The design has evolved since PEIR in response to further baseline survey and consultation responses and the final, detailed description of Proposed Development can be found within **Chapter 3: Description of the Proposed Development (Volume 6.2)** of the ES whilst the consideration of alternatives can be found within **Chapter 2: Alternatives (Volume 6.2)**. The Applicant is confident that the information contained within the ES is consistent and compliant with the EIA Regulations.



12.5.19 Reference was made at Stage 2 Statutory Consultation to the Waste (England and Wales) Regulations 2011 and the associated waste hierarchy, principles of proximity and self-sufficiency. The Applicant has considered these principles and evidence provided within the **WFAA (Volume 7.3)** confirms that there is both a local/ regional requirement for the facility as well as the national need. Furthermore, the Applicant demonstrates that the Proposed Development complies with the proximity principle (i.e., treating waste as close as possible to its point of arising). This latter point is especially relevant for the significant quantities of residual waste that are still exported from England for management via EfW in mainland Europe.

Location of the Proposed Development

12.5.20 The ES considers the potential for significant effects across a range of environmental topics and regarding schools and residential areas it should be noted that the Proposed Development would be located at the southern end of an industrial area with HGV traffic using New Bridge Lane hence not needing to pass through residential areas. The Applicant has also produced an **Outline CTMP (Volume 6.4)** and **Outline CEMP (Volume 7.12)** to manage the process of construction. By locating close to businesses there is the opportunity to provide them with heat and power. The Applicant is aware of the IDB drains within and adjoining the Order limits and has had regular discussions both before and following Stage 2 Statutory Consultation with the relevant internal drainage boards to discuss appropriate stand-off distances and to inform its design.

12.5.21 The Applicant has substantially reduced the length of the Grid Connection since Stage 2 Statutory Consultation. It initially considered a connection to the Walpole DNO Substation which would have longer than the option selected, with an element which would have been above ground. Following Stage 2 Statutory Consultation the alternative Walsoken Grid Connection Option was selected and this has resulted in a connection approximately 3.8km distant from the site of the EfW CHP Facility. The Applicant considers this to be relatively close to the Proposed Development.

12.5.22 The Proposed Development would be predominantly located within Fenland's Medworth Ward. Fenland District is ranked 80th out of 317 local authorities nationally, where 1 is most deprived whilst the ward of Medworth itself is not one of the most deprived within the district. The Applicant sited the Proposed Development within the Medworth Ward because the site for the EfW CHP Facility was at that time designated for waste uses and it lies in close proximity to potential customers of heat and power. The potential for significant effects upon local wards, including the local housing market are considered within **ES Chapter 15 Socio economics, Tourism, Recreation and Land Use (Volume 6.2)**.

12.5.23 The Applicant accepts that part of the Order limits lie within an area identified as being at risk from flooding. The Applicant has undertaken consultation with the EA to understand the extent to which Wisbech (and the Order limits) are defended flood plain and has discussed the approach to preparing a flood risk assessment with the Agency. The application is accompanied by a **Flood Risk Assessment (Volume 6.4)**.



- 12.5.24 The Scoping Opinion provided by PINS states that the ES should include for the consideration of alternative sites where these have been considered. The Applicant undertook a site selection process for the Proposed Development against their essential and preferable siting criteria, including proximity to areas of capacity deficit, potential CHP users, and large heat loads. Following completion of the site selection process, the consideration of specific alternative locations for an EfW CHP Facility was not considered to be necessary. The rationale for selecting the site is contained within the ES **Chapter: 2 Alternatives (Volume 6.2)**.
- 12.5.25 ES **Chapter 3: Description of the Proposed Development (Volume 6.2)** describes the Proposed Development. The Applicant has set out within ES **Chapter 2: Alternatives (Volume 6.2)** the reasons for selecting the land identified (and which may require compulsory acquisition). Part of this land is owned by FDC and a substantial proportion will be required for a temporary period only at which point the land will be reinstated and returned to the council.

Support for Principle of the Proposed Development

- 12.5.26 The Applicant noted that some expressions of general support for the Proposed Development were received during Stage 2 Statutory Consultation with some citing the environmental benefits of diverting waste from landfill, the economic benefits of increased employment opportunities, and the generation of energy and heat as reasons for their support. The Applicant has sought to reinforce these benefits through the preparation of an **Outline Employment and Skill Strategy (Volume 7.8)** which will be delivered via a DCO requirement and maintains its objective of providing heat and power to local businesses.

Objection to Principle of the Proposed Development

- 12.5.27 The Applicant notes these objections.
- 12.5.28 The PEIR version of the Waste Fuel Availability Assessment was based upon the latest published evidence bases which underpinned the waste local plans of those waste planning authorities in the assessment's Study Area. However, it is acknowledged that some of this data was out of date. As such, in the submission version of the **WFAA (Volume 7.3)**, an updated position in terms of newly consented capacity (as well as capacity which may have been lost) has been presented. The potential for any double counting of data in the **WFAA (Volume 7.3)** is also highlighted within the updated assessment whilst the availability of residual waste i.e., that part of the waste stream that is left over after reuse, recycling and other forms of recovery have taken place. It is therefore implicit in the **WFAA (Volume 7.3)** that the fraction of the household and commercial waste stream that is 'residual' is not able to be managed in any other way apart from incineration (with or without energy recovery) or landfill.
- 12.5.29 Comments were received from a number of consultees on the matter of increasing recycling rates. The **WFAA (Volume 7.3)** only considers the need for Proposed Development in the context of how much residual waste will require management in the future. Therefore, the achievement of national targets for the recycling and reuse



of waste has already been taken into account when considering how much residual waste is likely to require management in the future.

- 12.5.30 The Applicant has also responded to comments received on the matter of waste composition acknowledging that whilst the focus of the **WFAA (Volume 7.3)** is on the availability of residual waste only i.e., that after recycling has taken place, that specific recycling/recovery initiatives may change the composition of the residual waste stream. An obvious example of this is the removal of food waste for recycling and in this regard, the issue of changing composition has been considered in the **WFAA (Volume 7.3)** presented for submission.
- 12.5.31 Details of waste sorting methods and destinations are not presented in the WFAA which only considers those fractions of the waste stream that would be suitable for incineration and are presently being landfilled and the focus of the assessment is on the availability of residual waste i.e., that part of the waste stream that is left over after reuse, recycling and other forms of recovery have taken place. It is therefore implicit in the **WFAA (Volume 7.3)** that the fraction of the household and commercial waste stream that is 'residual' is not able to be managed in any other way apart from incineration (with or without energy recovery) or landfill.
- 12.5.32 The Applicant can provide clarity on the issue of proximity in relation to the export of RDF and relative to waste planning authority proximity considerations regarding household, industrial and commercial residual waste. The **WFAA (Volume 7.3)** has assessed both the local/regional requirement for the Proposed Development as well as the national need. The assessment concludes that there is insufficient residual waste management capacity available to ensure that non-recyclable waste can be managed as far up the waste hierarchy as possible (i.e., diverted from landfill) and in a manner which complies with the proximity principle (i.e., treating waste as close as possible to its point of arising). Whilst this latter point is especially relevant for the significant quantities of residual waste that are presently exported from England for management via EfW in mainland Europe, it is also relevant in terms of the waste that is presently exported from the East of England region for final disposal.
- 12.5.33 The Applicant's intention is that the Proposed Development will intercept UK waste which is currently exported and that it is satisfied that there is sufficient domestic waste available irrespective of, for example, high recycling rates within Cambridgeshire. It is not proposed to import waste from abroad.
- 12.5.34 The focus of the **WFAA (Volume 7.3)** is on the availability of residual waste i.e., that part of the waste stream that is left over after reuse, recycling and other forms of recovery have taken place. It is therefore implicit in the **WFAA (Volume 7.3)** that the fraction of the household and commercial waste stream that is 'residual' is not able to be managed in any other way apart from incineration (with or without energy recovery) or landfill. The Applicant does not believe that the Proposed Development will lead to the loss of valuable materials which could otherwise be recycled.
- 12.5.35 The Applicant does not have committed contracts in place to supply the Proposed Development. Until such time as there is some certainty around the Proposed Development, it is unlikely that there would be any commercial commitments to use the EfW CHP Facility. Notwithstanding this, the **WFAA (Volume 7.3)** has concluded that there is sufficient residual waste generated both 'locally' and nationally and



insufficient, corresponding waste management capacity to manage this waste as demonstrated by the assessments presented in the **WFAA (Volume 7.3)**.

- 12.5.36 The Proposed Development would burn waste that would otherwise go to landfill. By burning the waste electricity and steam is generated which can be exported to the national grid and/or used by local businesses. National Policy (EN-1) is clear that EfW provides an important means of generating power to provide peak load and base load electricity on demand, delivering predictable, secure and controllable electricity.
- 12.5.37 The Applicant is committed to developing a local, combined heat and power network and has designed the Proposed Development consistent with this objective. The application seeks all relevant powers to enable the construction and operation of a CHP network should consent be granted but recognises comments received that the success of the network will be dependent upon having the customers available to receive the heat and/or power. The Applicant is confident that a CHP network will be implemented and has undertaken a CHP Assessment to demonstrate its viability. If customers do not require heat, and if the CHP Connection is therefore not provided, the EfW CHP Facility will still generate electricity thereby recover energy from the waste and this electricity will be transmitted into the national grid at the Walsoken Substation.



13. Environment

13.1 Introduction

13.1.1 As part of the Stage 2 Statutory Consultation, the Applicant sought feedback in relation to the design of the Proposed Development, its impacts and the mitigation measures proposed to reduce the impacts of the Proposed Development on the local environment and community.

13.1.2 This chapter provides a summary of the relevant Environment consultation feedback received from prescribed consultees, Local Authorities, members of the public and wider stakeholders grouped under the following headings:

- Environment general;
- Ecology, biodiversity and designated areas;
- Flood Risk and water environment;
- Historic Environment;
- LVIA (Landscape and Visual impacts);
- Monitoring, reporting, enforcement and management and mitigation; and,
- Noise and vibration;

13.1.3 Where comments have not been received under the headings above, these have been removed to reflect this. The issues raised by respondents have also been grouped in table form at the end of this section, which includes the Applicant's response.

13.2 Section 42 Consultees

Local Authorities

Environment general

13.2.1 CCC said that the ES should demonstrate there will be no significant effect from major accidents and disasters on the environment, human health and safety, land uses, and amenity of surrounding uses within Cambridgeshire.

13.2.2 The Council requested further information on potential opportunities to enhance or improve the condition of the local Public Rights of Way (PRoW) network, rather than being returned to their condition pre-construction.

13.2.3 The Council agreed with the approach proposed to the consideration of both inter-project and inter-related effects in the Cumulative Effects Assessment. It requested that a realistic assessment of vehicle movements, travel distances and GHG



emissions should be completed prior to undertaking the Cumulative Effects Assessment.

- 13.2.4 The Council suggested that the Cumulative Effects Assessment should include:
- All proposed housing and development proposals within the identified zones of influence.
 - The potential impacts of the Proposed Development on the River Nene County Wildlife Site, and
 - The impacts of transporting waste fuel to the facility on GHG emissions and HGV movements.
- 13.2.5 Norfolk County Council agreed with Chapter 11, paragraph 11.9.1 of PEIR, which states that without further field survey information or a final design it was not possible to determine the importance of some ecological features or the extent of environmental change on certain features. It said that these surveys and ecological works should be undertaken in line with best practice guidance. The Council did however identify that insufficient information had been provided on the grid connections and potential environmental effects to provide a comprehensive response, and that further relevant field information should be provided.

Ecology, biodiversity and designated areas

- 13.2.6 CCC suggested that impacts on internationally designated biodiversity sites should be considered both in-isolation and in-combination with other relevant plans and projects. It suggested that the biodiversity assessment for the ES should provide a comprehensive, up-to-date assessment of the impact of the final Proposed Development, including the completion of the outstanding surveys listed in the PEIR Chapter 11 at Table 11.6. The Council said that they were satisfied with the scope of the biodiversity survey work but raised concerns about the surveying of the River Nene County Wildlife Site and out-of-date surveys.
- 13.2.7 The Council supported the features scoped in for further assessment listed in the PEIR Chapter 11 at Table 11.10. It requested evidence for the habitat scoped out in the PEIR at Table 11.11 to allow the Council to quantify the extent of land take using a Biodiversity Net Gain Assessment.
- 13.2.8 The Council suggested that more details should be included in the assessment of ecological features for the EIA, including a detailed Air Quality Assessment and completion of baseline ecological survey work, to determine the impact of some of the features.
- 13.2.9 The Council raised concern that the Proposed Development had identified potential negative effects on ecological features, particularly international and local biodiversity sites, habitats, and species. It said that insufficient evidence had been provided to demonstrate that any adverse impacts on ecological features would not be significant. It said that Hydrochloric Acid emissions should be considered in addition to acid deposition on designated ecological sites and that further information should be supplied as part of the ES, including:



- Potential negative impacts on ecological features;
- Completed biodiversity survey work;
- Lighting and landscape strategies; and,
- The finalised **Outline Construction Environmental Management Plan (CEMP)**.

- 13.2.10 The Council supported the screening of the construction and operational impacts on the Nene Washes SPA and the Ouse Washes SPA and Ramsar site. It did however raise concern that the Proposed Development may result in negative impacts on the Nene Washes SPA and Ramsar site and the Ouse Washes SPA, SAC and Ramsar site as a result of air pollution. It also highlighted that the biodiversity assessment should be updated to include a more in-depth study about the impacts of the Proposed Development on the River Nene County Wildlife Site be undertaken, including an assessment of the current condition of the river and associated semi-natural habitats or species adversely impacted by air quality changes.
- 13.2.11 The Council expressed concern that the level of significance of impacts on internationally important sites cannot be ascertained, as the air quality modelling has not been considered. It suggested that the air quality modelling should be incorporated and assessed within the Habitats Regulation Assessment (HRA).
- 13.2.12 The Council suggested that a BNG Assessment should be undertaken to set out how the Proposed Development meets the 10 principles of BNG, including the Defra 3.0 BNG metric calculator to quantify BNG. It said that this would demonstrate how the Proposed Development meets the requirements of National Policy Statement EN-1, paragraph 180d of the NPPF, and Policy 22 of the Cambridgeshire and Peterborough Minerals and Waste Local Plan Proposed Submission 2021.
- 13.2.13 Norfolk County Council said that the location of any poles associated with the Grid Connection, construction compounds, and access routes were not included in the Extended Phase 1 Habitat Survey Plans in PEIR Chapter 11.

Flood Risk and water environment

- 13.2.14 The Borough Council of King's Lynn and West Norfolk requested information on whether access to water in an emergency situation has been considered by the Applicant.
- 13.2.15 Norfolk County Council said that the supporting Flood Risk Assessment (FRA) did not consider the requirements of the King's Lynn and West Norfolk Strategic FRA or the Norfolk Preliminary Flood Risk Assessment (PRFA) and Lead Flood Risk Management Strategies. The Council raised concern that there was no reference in the documentation to an Emergency Flood Plan for temporary construction works outside of the main site, despite these works being in an area at risk of multiple sources of flooding. It said that all Emergency Flood Plans should be consistent with the requirement of ADEPT Guidance.
- 13.2.16 The Council also requested further information on how the water ingress and dewatering of groundwater is planned to occur and where water would be



discharged to. It advised that a Surface Water Management Plan (SWMP) and a Drainage Strategy will be required and should include a plan for temporary dewatering discharges should any groundworks become flooded. It also said that the CEMP should consider the management of surface water quality management.

Historic Environment

- 13.2.17 CCC agreed with the conclusions for Cambridgeshire within PEIR Chapter 10, and that surface impact on the historic environment would be minimal. It considered the coverage of the history of the historic environment as satisfactory and said that PEIR Chapter 10 was ready for final submission.
- 13.2.18 Fenland District Council requested clarification on the infrastructure provided at the termination of the CHP Connection, due to its proximity to local and affected heritage assets. It also highlighted that the PEIR does not consider the potential impacts to heritage assets and their setting due to odours, noise or pollution created by the Proposed Development. The Council suggested that a photomontage of key viewpoints be provided to clarify the impact on views towards the site of the Proposed Development from affected heritage assets.
- 13.2.19 The Borough Council of King's Lynn and West Norfolk expressed concern that the PEIR only considered certain buildings and structures. It also said that the analysis of listed buildings' settings was inconsistent as some settings near to the red-line boundary had not been analysed. The Council suggested that this analysis should consider all designated heritage assets within the 2km boundary and said that designated heritage assets should be itemised, and analysis provided for each one. The Borough Council also identified that the impact of the Grid Connection on listed buildings at Oxburgh Hall had not been analysed.

LVIA (Landscape and Visual impacts)

- 13.2.20 CCC said that the LVIA followed most of the principles set out within GLVIA3 but highlighted that new guidance from the Landscape Institute on landscape value should be incorporated into the Landscape and Visual Impact Assessment (LVIA). It also considered that some of the effects on landscape, townscape and visual receptors had been underrepresented in the preliminary LVIA. The Council proposed effects on landscape and townscape character and visual receptors should be reviewed while the Proposed Development progresses and be re-evaluated following a design freeze. It raised concerns that a cumulative LVIA had not been included in the PEIR and said that one should be undertaken.
- 13.2.21 The Council said that for the townscape character assessment it was unclear whether a baseline had been established or if a review of viewpoints has been undertaken. It advised that a better viewpoint for assessment would be from the Nene Way Public Right of Way along the waterside, beyond the woodland to the north of the car park. It also shared further concern that an assessment of the effects to receptors within the Thomas Clarkson Academy had not been undertaken, despite requests.



- 13.2.22 The Council proposed that the Landscape Strategy be designed using the ecological mitigation hierarchy and maximise BNG. It recommended that further discussions between the Applicant and the Council take place prior to application submission for the development of the strategy.
- 13.2.23 The Council commented that the Zone of Theoretical Visibility (ZTV) study had not been undertaken using a full 3D block model as had been requested. It therefore considered that the study did not accurately represent the scale, depth, width, and mass of the structures. The Council also said that an assessment of the plume had not been included within the ZTV study and suggested it and an assessment of its potential effects be included in the final application. It raised similar concerns that the PEIR did not include a composite ZTV and a comparison between the plume ZTV and the ZTV for the stack alone. It suggested that the height of the Proposed Development should be demonstrated by using a blimp to better express the potential effects of the Proposed Development's height.
- 13.2.24 Fenland District Council identified that the ZTV maps were unclear and did not reflect visibility considerations within the PEIR. It questioned whether the ZTV maps indicated a level of additional visual impact from the Proposed Development.
- 13.2.25 The District Council said that the visual appearance of the main facility building was not provided and that no assessment of the chimney height against existing buildings had been shared. It expressed concern about the adverse visual impacts of the proposed Grid Connection to the Walpole Substation on the open Fen countryside and landscape.
- 13.2.26 Norfolk County Council said that it was satisfied with the study area and with the justification for the selected viewpoints.

Monitoring, reporting, enforcement and management and mitigation

- 13.2.27 CCC suggested that the final outline CEMP should incorporate the embedded environmental measures to protect biodiversity as set out in PEIR Chapter 11, section 11.7. It also said that the CEMP should be accompanied with an Ecological Mitigation Strategy and Invasive Species Management Plan.
- 13.2.28 The County Council suggested that the countryside could be restored to more recent 19th century land use types with regards to off-set biodiversity gain that have a heritage pedigree.
- 13.2.29 The CCC also requested that the ES provide details regarding the remit and responsibilities of the Local Liaison Committee, including a commitment for the Committee to meet regularly and throughout the lifetime of the project (including its operation).
- 13.2.30 The Borough Council of King's Lynn and West Norfolk raised concern that their comments on the Scoping Report were not reported in the Summary of EIA Scoping Opinion responses in PEIR Chapter 13. It did however support the approach to subsequent environmental surveys and monitoring and informal consultation following the publication of the PEIR. The Council raised concerns that the Proposed



Development will not be adequately monitored by the EA due to the infrequency of site visits, and that operators are informed of upcoming visits.

- 13.2.31 Norfolk County Council said that potential impacts on protected species and priority habitats should be assessed, and the mitigation hierarchy applied if new poles are required for the Grid Connection. It also requested that the Habitats Regulation Assessment Screening Report be updated to reflect design changes and the introduction of Grid Connection Option 2. The Council further suggested that the assessment be updated after completion of air quality dispersion modelling.

Noise and vibration

- 13.2.32 CCC said that the reference to the Control of Noise at Work Regulations 2005 (CoNAW) in Table 7.3 and Section 7.8 of the PEIR Chapter 7 were not relevant. It identified that CoNAW relates to the hearing protection of workers rather than assessing potential noise impacts from external noise sources at industrial and commercial receptors.
- 13.2.33 CCC and Fenland District Council said that a hybrid approach be applied to the assessment of noise at industrial and commercial receptors using:
- BS 4142;
 - BS 8233; and,
 - relevant limits prescribed by the WHO.
- 13.2.34 The Council's also advised that Technical Guidance for noise and vibration BS 8233:2014 be added to the list of BS standards in Table 7.7 of the PEIR Chapter 7. The CCC said it was satisfied with the use of Design Manual for Roads and Bridges (DMRB) LA 111 in PEIR Chapter 7, Paragraph 7.4.3.
- 13.2.35 The Council's suggested that PEIR Chapter 7, Tables 7.8 and 7.9 confirms that the joint Association of Noise Consultants/Institute of Acoustics Guidance note regarding COVID-19 was reviewed and that the approach taken is consistent. It requested further information on the locations of ST6 and ST8 in order to maintain consistency with other monitoring locations. The Council's also advised that the Applicant should use their suggested wording for PEIR Chapter 7 paragraphs 2.2.1, 2.2.3, 2.2.5, 2.3.1, and 2.4.2.
- 13.2.36 The Council's said that the wording in the PEIR Chapter 7 paragraphs 7.5.7 to 7.5.9 should clarify that the 'desk-based review' was a consideration of relevant data available rather than a formal review. It also advised that the information regarding embedded environmental measures and their influence on the noise and vibration assessment in the PEIR Chapter 7, Table 7.18 should be reworded to provide greater clarity. A request was also made that the Applicant provide alternatives for all monitoring locations set out in the PEIR Chapter 7, paragraphs 2.1.13 to 2.1.14 to ensure delays with planning permissions are avoided.
- 13.2.37 The Borough Council of King's Lynn and West Norfolk expressed concern about the noise impact during construction of the Grid Connection, including from Horizontal



Directional Drilling and the potential for night-time noise from pumps where drilling will take place.

Prescribed Consultees

Environment general

- 13.2.38 Emneth Parish Council objected to the Proposed Development due to its effects on the natural environment and local area.
- 13.2.39 The EA said that the Environmental Permitting Regulations permit application would require a more detailed technical assessment of operations than might be provided in the DCO application.
- 13.2.40 The Forestry Commission said that the Proposed Development would not likely adversely impact on ancient woodland due to its location. It accepted that it may affect some trees but that this would be compensated with tree planting to help break up the hard structure within the landscape.
- 13.2.41 Historic England said that the ES should clearly demonstrate that the historic environment, landscape and visual study areas are appropriate and are informed by a detailed analysis of ZTV exercises, guided by the County archaeological adviser. It also highlighted the need for the County archaeology team to be consulted for guidance on the requisite evaluation and survey work required.
- 13.2.42 Natural England welcomed the implementation and maximisation of the following embedded environmental measures:
- Minimising land take and micro-site;
 - Sensitive vegetation removal;
 - Maintaining habitat connectivity;
 - Protection of retained habitats;
 - Habitat reinstatement; and,
 - Sensitive access and enabling works.
- 13.2.43 It said that the ES must demonstrate how the Proposed Development would contribute to nature recovery and the delivery of Natural Cambridgeshire's 'doubling nature' targets.

Ecology, biodiversity and designated areas

- 13.2.44 Natural England agreed with the conclusion of the HRA screening. It agreed that there would be no potential for likely significant effects in relation to collision, disturbance and displacement on any of the qualifying features of the Nene Washes, Ouse Washes and The Wash SPA, SAC and Ramsar sites.
- 13.2.45 It advised that any surveys, assessments, and mitigation relating to protected species should comply with its standing advice document. It further suggested that



any departures from this advice, including likely consequences of said departures, should be contained within the ES.

- 13.2.46 Natural England also said that the Applicant should seek advice on protected species surveys, assessments and draft mitigation proposals through its Discretionary Advice Service and Pre-submission Screening Service.
- 13.2.47 Wisbech Town Council highlighted that the baseline biodiversity assessment was incomplete as surveys of the habitats on the site and in the surrounding area had not yet been undertaken. It said that there currently can be no conclusion that there are no likely significant effects.

Flood Risk and water environment

- 13.2.48 The EA agreed with the approach taken to flood risk within the PEIR. It noted however that Table 1.6 of the FRA stated that the finished floor levels would be set above 0.1% AEP but did not provide further detail on areas not classed as essential infrastructure. It said that either finished floor levels provided for these areas or the Site be developed with the same finished floor level. It also requested confirmation of the division of the Site into different classifications and that access roads be set according to the 0.1% AEP to ensure site access in the event of a breach.
- 13.2.49 The EA confirmed that there would be no hydrological effects from the Proposed Development on The Wash Ramsar and SPA and The Wash and North Norfolk Coast SAC. It also supported the measures outlined within the PEIR, Table 12.9.
- 13.2.50 The EA also said that it was satisfied that the Proposed Development would not have effects upon the Nene Washes Ramsar, SAC and SPA and Ouse Washes SPA, as these natural assets are located upstream.
- 13.2.51 Hundred of Wisbech IDB and Waldersey IDB identified that the area within which the Proposed Development is located has experienced flooding as recently as 2021. They advised that the Hundred of Wisbech IDB is investigating options to alleviate flows entering the drainage system. They also commented that the Proposed Development site would be served by three corrugated steel culverts under the A47 but noted that Highways England had been consulted about the structural integrity and capacity of these culverts.
- 13.2.52 Hundred of Wisbech IDB highlighted that the Proposed Development would likely be vulnerable to water shortages and resulting water stress. It questioned whether the Proposed Development could source alternative water supplies instead of relying heavily upon potable water and suggested consideration of a 'closed loop system' on site to capture, store and treat rainwater.
- 13.2.53 It requested that the Applicant ensure no pollution or foreign material be deposited into an open watercourse during construction and operation and that this could require a suitable pollution retention device.
- 13.2.54 Hundred of Wisbech IDB and Waldersey IDB said that the Proposed Development could help reduce discharge flows into local drainage systems. They expressed concerns with potential water pollution impacts on local agricultural land, urban development, and the aquatic environment. They also considered that the Proposed



Development has the potential to adversely impact the ecosystems of the River Nene and the smaller habitats and species in the vicinity.

13.2.55 The Marine & Coastguard Agency requested information on potential works expected to take place below the Mean High Water Level.

13.2.56 Wisbech Town Council said that confirmation is needed whether the finished floor levels relied upon to mitigate any impact from flooding are the same as those assessed in the landscape and visual assessment. It also expressed concern that the NTS provided is unclear on how much the development will need to be raised to mitigate flood risk. Similarly, it highlighted that no information on an appropriate Drainage Management Plan was provided within the PEIR, which means that readers cannot provide any meaningful comment on this issue due to a lack of information.

13.2.57 The Town Council requested clarification on the impact on flood risk of the construction of the 15m waste bunker, in order to be able to fully consider the flood risk impacts of the development on the surrounding area. Similarly, it expressed concern about the lack of information on how the waste bunker would impact upon flood risk, especially given Wisbech is an area at high risk of flooding.

Historic Environment

13.2.58 Historic England said that the impacts of the Proposed Development on the historic environment should be considered throughout the EIA process and the ES, as it considered that the likely effects will be significant. It welcomed the information contained within the PEIR and agreed with its multi-discipline approach to heritage assessment, confirming that heritage assets had been scoped into the ES for further assessment. Historic England also expressed support for paragraph 10.12 of the PEIR Chapter 10, where it states the feedback from the consultation would be used to augment the final assessment of the Proposed Development.

13.2.59 Historic England recommended that the final assessment of heritage assets examine all potential impacts more thoroughly than in the PEIR, including consideration of the visibility of the Proposed Development from local conservation areas and listed buildings. It also advised that the final assessment and the ES include the following further work to ensure its acceptability with regards to historic environment considerations:

- Viewpoints, photomontages and rendered images in support of setting and LVIA analysis;
- More detailed archaeological data, including geo-archaeological works; and
- Records of archaeological surveys and evaluation fieldwork.

13.2.60 Historic England recommended that the significance of heritage assets be identified at an early stage, as required by paragraphs 194, 189 and 199 of the NPPF, to ensure their conservation in a manner appropriate to their significance. It said that earlier identification of significance would allow for the evolution of a baseline assessment, heritage and ES, and management plans to serve as a strong basis for design decisions.



- 13.2.61 Historic England expressed the need for analysis to continue to focus on setting, landscape and archaeological approaches to ensure the Proposed Development aligns with the sustainable development objectives set out in the NPPF. It also said that impacts on the historic environment should be avoided or minimised and that any harm caused be supported by sufficient justification in line with the NPPF.
- 13.2.62 Wisbech Town Council expressed concern that the impacts of the tipping bunker and main waste bunker on archaeological remains up to 15m below finished floor level, had not been considered within the PEIR Chapter 10. It also expressed concern that reference to the Planning (Listed Building and Conservation Areas) Act 1990 was underplayed within the PEIR in regard to development affecting listed buildings or their settings.
- 13.2.63 The Town Council queried why there was not an appropriate Heritage Impact Assessment within the PEIR Chapter 10, as without this it is not possible to draw reasonable conclusions related to the planning balance or conclude that there would not be significant harm to heritage assets.

L VIA (Landscape and Visual impacts)

- 13.2.64 Natural England supported the commitment to use the Guidelines for LVIA as set out in PEIR Chapter 9.
- 13.2.65 Wisbech Town Council expressed concerns about the visual impact of the Proposed Development and suggested that the height of the development would result in a change in the character of Wisbech from a quaint Georgian market town to a more industrial setting. It also raised concern that no information was provided on the visual impacts of the deposition of the excavated materials from the construction site of the waste bunker on landscape character and views.

Monitoring, reporting, enforcement and management and mitigation

- 13.2.66 The Forestry Commission suggested that the Proposed Development provide a detailed tree planting scheme for the replacement of any trees lost during construction and to provide a net gain in tree assets within the area.
- 13.2.67 Historic England suggested that detailed method statements providing construction operations, construction methods and mitigation strategies be produced to appropriately manage any archaeological potential on the Proposed Development site and Grid Connection sites.
- 13.2.68 Hundred of Wisbech IDB said that water discharged into open watercourses during construction and decommissioning be regularly tested to ensure compliance with relevant standards, and that suitable filter strips be installed besides any open watercourse. It also suggested that any excavated, imported or exported soils and materials also be regularly tested to meet standards and not placed within 20m of an open watercourse during construction and decommissioning.
- 13.2.69 National Grid similarly requested the planting of slow and low growing species of trees and shrubs near the existing overhead line to reduce the risk of compromising statutory safety clearances.



- 13.2.70 Natural England highlighted the potential loss of semi-natural woodland, deciduous and veteran trees and hedgerows, and said that replacement habitats should be identified within the ES including the location of re-planting. It advised that the Proposed Development consider the new amendment to the Environment Bill for 'Biodiversity Net Gain' for NSIPs and to provide habitats beyond the existing baseline.
- 13.2.71 Natural England agreed with the approach to the provision and implementation of an Ecological Mitigation Strategy, Habitat Management Plan, Landscape and Ecological Management Plan, and CEMP. It advised that details of ecological mitigation measures for species and habitats be provided within the ES if the possible Area A extension is pursued. It similarly agreed with the approach for the assessment of combined and cumulative impacts set out in PEIR Chapter 18.
- 13.2.72 Wisbech Town Council shared their view that the policy tests on the consideration of potential impacts set out in paragraphs 199-203 of the NPPF were sufficiently addressed in the PEIR. It suggested that the PEIR reference the balancing exercise required between harm and public benefit when undertaking the assessment of potential impacts as a key determinant of significance. The Council similarly commented that the PEIR was unclear about whether the geology, hydrology and contaminated land study area represented the entire application site or just the main development site.

Noise and vibration

- 13.2.73 Historic England said that assessments should be undertaken to consider environmental impacts beyond visual impacts, such as from smells, noise, vibrations etc, on heritage assets. It also proposed that the Applicant include detailed mitigation measures to address these effects.
- 13.2.74 Wisbech Town Council expressed concern about the noise impact during construction of the Grid Connection, including from Horizontal Directional Drilling and the potential for night-time noise from pumps where drilling will take place.
- 13.2.75 Wisbech Town Council also said that there was a lack of traffic data within the PEIR Chapter 7, which they considered affected the noise assessment and any conclusions regarding noise effects based upon it. It further commented that there was no baseline noise information for receptors potentially affected by the combined heat and power connection or Grid Connection included in the NTS.

Traffic and Transport

- 13.2.76 Wisbech Town Council shared their view that there was a lack of traffic data within the PEIR, which they considered affected the noise assessment and any conclusions regarding noise effects based upon it. They further commented that there was no baseline noise information for receptors potentially affected by the combined heat and power connection or Grid Connection included in the NTS.



Persons with an interest in land (PILs)

Environment general

- 13.2.77 A PIL raised concerns that the Proposed Development would have significant adverse impacts on the local natural environment.

Ecology, biodiversity and designated areas

- 13.2.78 A PIL highlighted that there are several Ramsar sites in the local area around the Proposed Development and considered that these would be adversely impacted by particulate emissions generated from operations. A further PIL said that further environmental surveys and equipment installations may trigger another incident of equine grass sickness at a nearby farm.

L VIA (Landscape and Visual impacts)

- 13.2.79 Some PILs raised concerns about the visual impact of the Proposed Development on existing properties and landscape, particularly from the heights of the proposed buildings and chimney.

Monitoring, reporting, enforcement and management and mitigation

- 13.2.80 A PIL proposed that further environmental studies be undertaken to assess the potential effects of the Proposed Development and its operations. They suggested that the Applicant be responsible for the costs associated with installing mitigation measures at local businesses.

13.3 Section 47 Consultees

Members of the public

Environment general

- 13.3.1 Members of the public often raised concerns about the environmental impacts of potential light, noise and air pollution from the Proposed Development and its operations on the local environment, wildlife and communities. Some said that the light pollution generated by the Proposed Development from artificial lighting and vehicle headlights would adversely impact local species and communities. Others expressed concern with the ammonia produced by the Proposed Development and its effects on the local environment.
- 13.3.2 Members of the public said that the Proposed Development would generate too many adverse effects due to the odours it would produce. Some commented that the Proposed Development would be an environmental disaster, with requests for further information on the potential environmental effects in Walsoken.
- 13.3.3 Some respondents suggested that the Proposed Development would conflict with the requirements of the Environment Bill, which they considered would likely



become law before construction is completed. Others said that they considered the Proposed Development not to be in accordance with national environmental legislation and policies.

- 13.3.4 Respondents also raised concerns about the potential adverse impacts of particulate emissions on local agricultural land and crops with some questioning how any damage to its important agricultural soil, could be considered acceptable. They further commented that the National Farmers' Union had identified how important soil quality is to the agriculture within the Fens.
- 13.3.5 A member of the public raised concerns about potential pest and odour issues resulting from the location of large amounts of waste within the tipping bunker and considered that this would have adverse impacts on the local area and neighbouring communities.
- 13.3.6 A respondent highlighted that the Saddlebow Incinerator Project was rejected in 2013 by 93% of voters in a referendum due to the considerable environmental impacts and suggested the same outcome would occur if there was a referendum on the Proposed Development.

Ecology, biodiversity and designated areas

- 13.3.7 Members of the public said that the Proposed Development would have adverse effects on local biodiversity, referencing assets including the Wash Marshes, Fenland Waterways, the North Norfolk Coast, the Wash SSSI, Welney Wetland Centre nature reserve, and the River Nar SSSI. Concerns raised included, the proximity of the Proposed Development to these assets as well as pollution of the River Ouse as an important SSSI.
- 13.3.8 Many respondents expressed concern that the Proposed Development would adversely impact local protected species and domestic animals and that it would result in loss of habitats and cause disturbance to local birds and bats due to the emission of nitrogen and other contaminants. Others said that the Proposed Development would have adverse effects on species and crops within up to a 23km radius as a result of nitrogen, cadmium emissions and heavy metals.
- 13.3.9 Several members of the public said that the Proposed Development would compromise local habitats that contain species such as deer, foxes, hare, rabbits, hedgehogs, numerous bird species and insects. A respondent highlighted that the local area remains relatively undisturbed and is popular for local wildlife, heightening the importance of protecting this area.
- 13.3.10 Members of the public also suggested that the Proposed Development would compromise habitats used by migratory species especially those that use The Wash and Welney Wetlands.
- 13.3.11 Respondents also raised concerns that the operation of the Proposed Development would contribute towards acid rain, which they considered would cause considerable and ongoing harm to local soils, habitats, and the environment.



Flood Risk and water environment

- 13.3.12 Members of the public expressed concern that the local water environment would be compromised by the Proposed Development, including that pollution discharges would adversely impact on local waterways. A respondent also expressed concerns about potential adverse impacts on the local water environment due to the potential risks of HGVs spilling waste due to navigating narrow local roads.
- 13.3.13 Respondents said that the Proposed Development would cause considerable damage to the River Nene, an important habitat for seals, Harbour Porpoise, and a variety of fish and bird species. Further comments also suggested that the River Nene is extremely important to Wisbech's character, setting and livelihood, which they considered that the Proposed Development would compromise.
- 13.3.14 A respondent similarly raised concern that the Proposed Development would pollute the Ouse Washes SSSI and the Nene Washes. Further responses highlighted that the Proposed Development was below the High Water level of the River Nene or that it is situated within an area at risk of flooding.
- 13.3.15 Members of the public suggested that future floods could cause the Proposed Development to become isolated and inoperable due to vehicles being blocked from accessing it by flood waters. They also raised concern about the potential contamination of the area from flood waters reaching the Proposed Development and washing waste into the local area.
- 13.3.16 Members of the public raised concern that the Proposed Development would adversely impact ground water or would require the consumption of large quantities of water, exacerbating existing drinking water supply issues in the local area.

Historic Environment

- 13.3.17 Members of the public expressed concern about potential adverse effects on the historic environment and its character and setting. Some respondents highlighted that acid rain could damage local historical assets, including the potential for increased acidification of limestone on listed limestone buildings within Wisbech.
- 13.3.18 Further comments highlighted that Wisbech is a Georgian town with many Grade 1 and 2-listed buildings located within it and that there are currently 266 listed buildings in the area, many of which are within 1km of the Proposed Development. Respondents also expressed concern that the Proposed Development would have adverse effects on the following heritage assets:
- Grade 1-listed Peckover House;
 - Statue of Thomas Clarkson on Bridge Street;
 - Octavia Hill's Birthplace House Museum;
 - Wisbech and Fenland Museum; and,
 - The Grade 1-listed St Peter's & St Paul's Church.



L VIA (Landscape and Visual impacts)

13.3.19 Respondents raised concerns regarding the visual impact of the Proposed Development, including the Grid Connection, proposed chimney and its associated aviation lighting. Some said that it is not possible to mitigate the visual effects of the Proposed Development whilst others objected to the Proposed Development due to adverse visual impacts on the local landscape.

Monitoring, reporting, enforcement and management and mitigation

13.3.20 Members of the public regularly raised concern that the adverse effects of the Proposed Development on wildlife, and the natural and water environment could not be mitigated or that mitigation measures could not make these effects acceptable. Some respondents raised concerns that mitigation measures would not be sufficiently funded by the Applicant with questions about how environmental mitigation and enhancement measures would sustain and conserve the local built and natural environment. Further comments questioned what emergency plans would be in place for the Proposed Development if the area floods whilst it is operational.

13.3.21 Members of the public said that the proposed environmental mitigation measures were appropriate and that they would help to protect communities and the local environment.

13.3.22 Some respondents considered that the environmental surveys and assessments were insufficient, including in relation to the effects on local soils. Others considered that the proposed biodiversity and ecological enhancements were insufficient due to the potential adverse effects, including concerns regarding the effects of infrastructure improvements at New Bridge Lane on the natural environment.

13.3.23 A respondent suggested that the Proposed Development should only be developed if it could show it would have a net-zero environmental impact, whilst another said that the regulatory safeguards and monitoring procedures are inadequate and that the current pollution fining system is not a sufficient deterrent.

13.3.24 Comments were received from members of the public suggesting that insufficient information had been provided regarding contribution to increased pollution in the local area. They further queried how sufficient measures could be developed to mitigate this and how consultees could provide comments.

13.3.25 A member of the public said that there was not adequate provision for pest and vermin infestations within the CEMP. They raised concern that the watercourse located between Fountain Frozen Ltd. and the Proposed Development would likely be severely at risk, and it was not included in the CEMP with measures to protect local watercourses. They said that the proposed mitigation plan was inadequate and would pose a considerable risk to local businesses.

Noise and vibration

13.3.26 Members of the public said that associated vehicle movements for the Proposed Development would have adverse effects on local residents, wildlife and the



environment from noise and vibration. Some suggested that the Proposed Development would generate significant noise effects during both construction and operation.

Businesses and Community Groups

Environment general

- 13.3.27 Fascinating Fens identified the Fens as a key food producer for the UK and that the Proposed Development would pose a severe risk to national food security by harming the area's soils and agricultural land.
- 13.3.28 Kirk Coachworks said that the Proposed Development would have adverse environmental effects on local communities and residential areas in the vicinity.
- 13.3.29 Elm Road Primary School and Nene and Ramnoth School expressed concern with all of the potential environmental effects the Proposed Development would cause to the local and wider areas.
- 13.3.30 Shampers Dog Grooming said that the Proposed Development would never be environmentally friendly.
- 13.3.31 WEP Fabrications Ltd highlighted that the Wisbech area is a primary producer of fruit and vegetables within the UK. It said that the cumulative effects of the Proposed Development on local soils and agricultural land could cause irreparable harm to crop production and quality and that the Fens are an important agricultural growing area. It shared concern that the environmental effects would only increase over time.
- 13.3.32 Wisbech and March District Trades Union Council considered that the Proposed Development would operate 24/7, producing noise, light and emissions at all times and disturb local wildlife and residents throughout. It said that despite the Applicant's reassurances at other energy-from-waste facilities, local residents often experience odour, light, and other disturbances above anticipated levels. CPRE also expressed concerns with the potential light pollution created by the proposed buildings and car parks.

Ecology, biodiversity and designated areas

- 13.3.33 CPRE said that the Proposed Development could place the planned Fens Biosphere UNESCO biosphere designation at risk.
- 13.3.34 Fascinating Fens said that the Proposed Development would have adverse effects on local protected and non-protected species and that the orchards in the vicinity of Wisbech should be protected. It also expressed concern that the Proposed Development will be located in close proximity to The Wash SSSI.
- 13.3.35 Shampers Dog Grooming considered that the Proposed Development would cause pollution in local rivers and water bodies that contain rare and protected species such as the Spined Loach.



Flood Risk and water environment

- 13.3.36 CPRE and Fascinating Fens Fenland said that the Proposed Development would be located within land identified as Flood Zone 3. They considered that this would likely result in the pollution of or endanger local land and rivers, dykes and drains. In combination, they also identified that species such as newts and natterjack toads exist on pylon sites and many of the local waterways are home to species of eels, water voles and seals, all of which could be affected by the Proposed Development.
- 13.3.37 CPRE also identified that the Proposed Development is located on low-lying land with existing drainage issues, which they considered could conflict with local drainage infrastructure and systems. Similarly, they expressed concerns that it could alter the existing local hydrological pressures and cause additional drainage/hydrological issues for local residents and businesses.
- 13.3.38 Engineering & Factory Supplies Ltd, Icon Engineering Ltd and MJ Acoustics identified that the Proposed Development is located on a flood plain and that properties surrounding it are liable to flooding.

Historic Environment

- 13.3.39 CPRE said that the proximity of the Proposed Development in relation to the Wisbech Conservation Area was of concern. It also expressed concern about the assessment of the proposed effects on the Wisbech and Elm Conservation Area, as it concluded that effects to be 'not significant', which is incorrect.
- 13.3.40 CPRE said that the historic environment assessment was incomplete as it did not consider views from first and second storeys. It considered that the visual impacts upon the Wisbech and Elm Conservation Area, local properties and the local character would be considerable. It also queried why the Applicant had not carried out individual assessments of its likely effects on the 290 listed buildings located within the Wisbech, Fenland and Cambridgeshire areas.

LVIA (Landscape and Visual impacts)

- 13.3.41 CPRE, Fascinating Fens and Wisbech March Trades Union Council raised concern about the projected visual impact of the Proposed Development. They said that this would have adverse effects on local communities and residents as it will change the local character and surrounding countryside landscape.
- 13.3.42 CPRE raised concern that the Proposed Development is not sensitive to the environmental, social, artistic, or cultural value associated with the English countryside and the Fens landscape. It also considered that it would have significant adverse impacts on the Fens National Character Area and locally designated Landscape Character Types and Areas in Cambridgeshire, Peterborough, South Lincolnshire, and West Norfolk.
- 13.3.43 Commercial Safety Systems Ltd, Engineering & Factory Supplies Ltd, English Brothers Ltd, MJ Acoustics and The Sportsman Pub expressed concern regarding the visual impact of the Proposed Development. Commercial Safety Systems Ltd,



Engineering & Factory Suppliers Ltd and MJ Acoustics said that the chimney will be an eyesore for the local area.

13.3.44 Elm Road Primary School and Nene and Ramnoth School raised concern about the projected visual impact of the Proposed Development. They said that this would have adverse effects on local communities and residents as it will change the local character and surrounding countryside landscape.

13.3.45 Wisbech, March and District Trades Union Council said that the architectural and cultural heritage of Wisbech is a key component to attracting visitors and raised concern about the visual impact of the Proposed Development.

Wider stakeholders

Environment general

13.3.46 Cambridge Friends of the Earth considered that the Proposed Development would operate 24/7, producing noise, light and emissions at all times and disturb local wildlife and residents throughout. It said that despite the Applicant's reassurances at other energy-from-waste facilities, local residents often experience odour, light, and other disturbances above anticipated levels

13.3.47 Cambridge Friends of the Earth said that the Proposed Development had the potential to increase the likelihood of acid rain, which could affect the respiratory health of local residents. It also said that heavy metals would be produced which would be toxic to vegetation and increase heavy metal levels in soils, harming soil organisms and microbial processes. It said that it is therefore essential that soils with high concentrations of Cadmium are managed appropriately to avoid it entering into the human food chain or the local root system.

13.3.48 Cambridge Friends of the Earth raised concern about metals and other pollutants accumulating in the environment over the lifespan of the Proposed Development. It said that Cadmium may hit its boiling point within the incinerator, causing emissions as vapour through stacks, rather than being captured in the filters and that absorbed metals could deposit within fog droplets and be deposited on the ground.

13.3.49 Fenland and West Norfolk Friends of the Earth said that the true environmental effects of the Proposed Development cannot be quantified until full environmental and biological surveys are completed. It also said that the current environmental surveys and assessments submitted were insufficient. It expressed concern that the Proposed Development would have potential to pollute farms within the Fenlands.

13.3.50 Liz Truss MP objected to the Proposed Development due to its environmental effects in the local and wider area. She also said that the potential effects on local soils, agricultural land and/or crops would not be acceptable.

13.3.51 Nordelph Parish Council objected to the Proposed Development due to its effects on the natural environment and local area.



Ecology, biodiversity and designated areas

- 13.3.52 Nordelph Parish Council raised concerns that the Proposed Development would have adverse effects on local agricultural soils and crops.

Flood Risk and Environment

- 13.3.53 Fenland and West Norfolk Friends of the Earth said that the Proposed Development would be located within land identified as Flood Zone 3. It considered that this would likely result in the pollution of or endanger local land and rivers, dykes and drains. In combination, they also identified that species such as newts and natterjack toads exist on pylon sites and many of the local waterways are home to species of eels, water voles and seals, all of which could be affected by the Proposed Development.
- 13.3.54 Nordelph Parish Council raised concerns that the Proposed Development would have considerable adverse effects on local waterways due to potential discharging of pollution into them.

LVIA (Landscape and Visual impacts)

- 13.3.55 Fenland and West Norfolk Friends of the Earth expressed concern about the projected visual impact of the Proposed Development. It said that this would have adverse effects on local communities and residents as it will change the local character and surrounding countryside landscape.

Monitoring, reporting, enforcement and management and mitigation

- 13.3.56 Cambridge Friends of the Earth said that the monitoring process and methodology standards required by the EA are not adequate. It highlighted that these standards do not require the monitoring and recording of hundreds of different emissions including dioxins, heavy metals and PM2.5 particulates and that the methodology for undertaking spot checks to monitor emissions is flawed as periods of high emissions can be missed.
- 13.3.57 Cambridge Friends of the Earth requested the monitoring of dioxins in local cattle, animals, and residents. It also requested checks to be carried out on dust, vegetation, and local water bodies to ensure effective monitoring. The long-term monitoring of soil resources was also requested to identify any soil contamination and that environmental priorities should be focused on heavy metals.
- 13.3.58 Cambridge Friends of the Earth shared concern that the target values identified for some chemicals may be exceeded. It also expressed concern that soils surrounding the Proposed Development and especially soils located down wind, would have the potential to accumulate Cadmium and other metals. It highlighted that the current estimations of Cadmium emissions is likely to be understated, as these predictions assume the optimum sorting of waste prior to incineration.
- 13.3.59 Liz Truss MP said that the Applicant had not provided sufficient information on mitigation measures and that the information provided did not sufficiently detail the required infrastructure improvements and lacked information on carbon capture technology and its implementation. She said that the Proposed Development was



at too much of an early stage to enable sufficient consideration of mitigation measures.

- 13.3.60 Steve Barclay MP raised concern that the proposed mitigation measures provided were generic and did not include key mitigation measures required, such as highway improvements, CHP connections and CCS facilities.

Noise and vibration

- 13.3.61 Cambridge Friends of the Earth expressed concerns that despite reassurance from the Applicant, local residents would experience unexpected levels of noise, odour and light pollution both during construction and operation.

13.4 How feedback has influenced the DCO application

- 13.4.1 As outlined above, a range of comments were received from consultees in relation to environment. A summary of how feedback has been taken into account in the preparation of the DCO application is provided below with full details of the feedback received and the Applicant's response presented in tabular format in **Appendix JJ** (Table 6.1)

Environment general

- 13.4.2 Comments received during the Stage 2 Statutory Consultation said that the ES should demonstrate there will be no significant effect from major accidents and disasters. The Applicant can confirm that the ES submitted as part of the application considers the topic of Major Accidents and Disasters in ES **Chapter 17: Major Accidents and Disasters (Volume 6.2)**. The approach taken to the consideration of this topic was set out within the EIA Scoping Report and confirmed by the Planning Inspectorate which stated (ID 4.10.12) that it was it agreed that the measures described in the Scoping Report can be sufficient in addressing any likely significant effects. It requested that the ES provide details of the measures and how they would be secured. This is reported within ES **Chapter 17: Major Accidents and Hazards (Volume 6.2)**.
- 13.4.3 Consultees requested further information during the Stage 2 Statutory Consultation on potential opportunities to enhance or improve the condition of local Public Rights of Way (PRoW). Following the Stage 2 Statutory Consultation the Applicant reviewed the approach to the Proposed Development, which includes the Grid Connection and can confirm that the Proposed Development as submitted, will not directly cross a PRoW. The works to construct the Grid Connection will be undertaken at night and the informal right of way reinstated. The Applicant has prepared an **Outline Community Benefits Strategy (Volume 7.14)** which provides the opportunity for local environmental works to be funded in the local area which could include for improvements to local PRoWs. This document sits outside the Environmental Statement.
- 13.4.4 Comments were received from consultees suggesting the Cumulative Effects Assessment should include all proposed housing and development proposals within the zone of influence. The Applicant can confirm that it has prepared ES **Chapter**



18: Cumulative Effects Assessment (Volume 6.2) with consideration of all known plans and projects. The long list of projects was shared with the relevant host authorities and any additional projects suggested by them, incorporated.

13.4.5 Concerns were raised by consultees that a cumulative LVIA had not been included in the PEIR which was provided at Stage 2 Statutory Consultation. The Applicant can confirm that **ES Chapter 18: Cumulative Effects Assessment (Volume 6.2)** considers the cumulative landscape and visual impacts of the Proposed Development.

13.4.6 A number of comments were received which expressed concern about a combination of noise and lighting effects. Potential noise effects due to the construction and operation of the Proposed Development have been considered in accordance with the relevant British Standards, and the assessments are reported within **ES Chapter 7: Noise and Vibration (Volume 6.2)**. Where any potentially significant effects are identified, appropriate control measures are identified to reduce the significance of the effects. The Applicant has also prepared an **Outline Lighting Strategy (Appendix 3B, Volume 6.4)** which seeks to control levels of illumination and only allow night time lighting for safety and security reasons.

Air

13.4.7 Respondents identified the Fens as a key food producer for the UK and said that the Proposed Development would pose a severe risk to national food security by harming the area's soils and agricultural land. The Applicant has prepared a **Human Health Risk Assessment (HHRA) (Appendix 8B, Volume 6.4)** subsequent to statutory consultation. This assesses potential impacts from bioaccumulation of dioxins and furans in the food chain. In addition, an assessment of metal deposition on land was also undertaken following the Environmental Agency guidance. The assessment therefore considers potential impacts from the deposition of dioxins, furans and metals on the local area, including farmland, and finds them to be not significant.

13.4.8 Comment was also raised that heavy metals would be produced which would be toxic to vegetation and increase heavy metal levels in soils, harming soil organisms and microbial processes. In response and subsequent to the Stage 2 Statutory Consultation the Applicant has undertaken detailed dispersion modelling of emissions from the chimneys. The assessment was undertaken considering Air Quality Objectives set for the protection of human health. Emissions are based on Emission Limit Values (ELVs) included in the EP regulations and includes metals. Results demonstrate acceptable levels of impacts and have informed the height of the chimney which is designed to ensure adequate dispersion.

13.4.9 The conditions attached to the EP will also specify that the EFW CHP Facility would need to monitor these emissions to ensure compliance with the ELVs set in the permit. The operator of the EFW CHP Facility will need to demonstrate to the EA in the permit application for the EFW CHP that they are using best available techniques for pollution prevention - including use of filters to prevent particulates and particle-bound pollutants such as heavy metals, being released to air.



Ecology, biodiversity and designated areas

- 13.4.10 Comments were received which referenced the lack of a comprehensive suite of ecological surveys contained within the PEIR as well as the absence of a final design such that conclusions with regard to significance could not be confirmed. Reference was made to the PEIR Chapter 11 which acknowledged a lack of survey information, particularly in relation to the Grid Connection to Walpole and the preliminary conclusion that there could be negative effects. Subsequent to the Stage 2 Statutory Consultation the Applicant has completed the ecological surveys and is of the opinion that they are sufficiently comprehensive to enable it to reach a robust conclusion upon whether the Proposed Development would have a significant effect upon biodiversity. Whilst some effects would be negative they would not be significant. The Grid Connection to Walpole is no longer proposed.
- 13.4.11 Requests were made to consider the effects of the Proposed Development upon the River Nene County Wildlife Site. This receptor has been considered within ES **Chapter 11: Biodiversity (Volume 6.2)** and it has been concluded that effects will not be significant.
- 13.4.12 A request was made that the ES demonstrate how the Proposed Development would contribute to nature recovery and the delivery of Natural Cambridgeshire's 'doubling nature' targets whilst other comments received raise the concept of Biodiversity Net Gain (BNG) in the context of the Environment Act 2021.
- 13.4.13 The Applicant has sought to minimise the loss of habitats and maximise the creation of additional habitat. It has prepared an **Outline Landscape and Ecology Strategy (Figure 3.14, Volume 6.3)** which identifies the habitats which would be created within the EfW CHP Facility Site. In addition, the Applicant proposes to provide a green wall to the Administration building. Relevant to the 'doubling nature' targets ES **Chapter 11: Biodiversity (Volume 6.2)** refers to the Natural Cambridgeshire Developing with Nature Toolkit and the extent to which this and the targets have informed both the habitats proposed and additional measures such as bat and bird boxes, bug hotels, hibernation boxes etc.
- 13.4.14 The Applicant has also considered BNG (**Appendix 11M, Volume 6.4**) and provides options for its delivery.
- 13.4.15 With regard to cumulative biodiversity effects, respondents requested consideration of impacts upon internationally designated biodiversity sites both in-isolation and in-combination with other relevant plans and projects. ES **Chapter 11: Biodiversity (Volume 6.2)** and the **Habitats Regulation Assessment NSER (Volume 5.3)** provide this consideration with further consideration of cumulative biodiversity effects reported within ES **Chapter 18: Cumulative Effects Assessment (Volume 6.2)**. The consideration of potential impacts upon these sites includes for the potential effects arising from air emissions as a result of the Proposed Development and finds there are no likely significant effects (HRA) and no significant effects (EIA).
- 13.4.16 A request was made that the biodiversity assessment should be updated to include a more in-depth study about the impacts of the Proposed Development on the River Nene County Wildlife Site (CWS), including an assessment of the current condition of the river and associated semi-natural habitats or species adversely impacted by



air quality changes. An assessment has been undertaken. It is presented within ES **Chapter 11: Biodiversity (Volume 6.2)** and it provides a summary of the current baseline condition of the CWS followed by an assessment of effects arising from the Proposed Development which include air quality both as a result of the EfW CHP Facility and of the vehicles which would attend it.

- 13.4.17 A comment was made that the location of poles, construction compounds and access routes associated with the Grid Connection were not included in the Extended Phase 1 Habitat Survey Plans in PEIR Chapter 11 Biodiversity. The Applicant has now amended the design of the Proposed Development such that there will be no poles associated with the Grid Connection which will be underground. Construction compounds are now restricted to the TCC only, whilst access routes would not cross any habitats given that all access to the Grid Connection would be from existing highways.
- 13.4.18 In addition to the potential to affect internationally important ecological sites referenced above, comments were received with regard to the importance of nationally designated sites including SSSIs. It was suggested that the Proposed Development would have adverse effects on local biodiversity, such as the Wash Marshes, Fenland Waterways, the North Norfolk Coast, the Wash SSSI, Welney Wetland Centre nature reserve, and the River Nar SSSI. Concerns raised included, the proximity of the Proposed Development to these assets as well as pollution of the River Ouse as an important SSSI.
- 13.4.19 The Applicant has considered the potential for the Proposed Development to affect nationally designated sites. ES **Chapter 11: Biodiversity (Volume 6.2)** considers sites within what it defines as a zone of influence from the Order limits. It concludes that effects arising from construction and operation would not be significant upon those nationally designated sites with the potential to be affected.
- 13.4.20 A combination of comments suggested that the Proposed Development would adversely impact local protected and non-protected species, orchards, local rivers and waterbodies and domestic animals and that it would result in the loss of habitats and cause disturbance to local birds and bats due to the emission of nitrogen and other contaminants. The Applicant has sought to minimise effects upon species by designing the landscaping scheme for the EfW CHP Facility with the objective of maximising habitat creation. Furthermore, it has sought to minimise disruption caused by the construction and operation of the Proposed Development and to this end, to address construction effects it has prepared and **Outline CEMP (Volume 7.12)** which includes measures to protect species and local watercourses. The choice of Walsoken as opposed to Walpole as the location for the Grid Connection means that there is now no potential to affect orchards. However, if a HDD solution is adopted to install the potable water connection across the A47 then this will require an area of land within an existing commercial orchard. The Applicant has therefore proposed a second option which is to open cut across the carriageway.

Flood Risk and water environment

- 13.4.21 A concern was raised that there was no reference in the documentation to an Emergency Flood Plan for temporary construction works outside of the 'main site',



despite these works being in an area at risk of multiple sources of flooding. The **Outline CEMP (Volume 7.12)** identifies the potential for flooding to affect construction and requires amongst other measures that method statements are prepared by the EPC Contractor to consider extreme weather events where risks have been identified and to register with the EA Floodline to receive flood warnings.

- 13.4.22 Requests were received for the preparation of a Surface Water Management Plan (SWMP) and a Drainage Strategy which should include a plan for temporary dewatering discharges should any groundworks become flooded. An Outline Water Management Plan has been prepared which addresses the issue of dewatering and it forms part of **the Outline CEMP (Volume 7.12)**. To monitor the quality of water contamination the **Outline CEMP (Volume 7.12)** also includes within the water management plan a protocol for encountering unexpected contamination, including groundwater contamination.
- 13.4.23 A comment was received that the preliminary FRA did not provide further detail on areas not classed as essential infrastructure. The Applicant subsequently set out floor levels for the different elements of the EfW CHP Facility using the EA Product 4 information. The conclusions were agreed with the EA on a consultation call on 19 December 2021. The finished floor levels will be 3mAOD for that part of the EfW CHP Facility Site north of the HWIDB drain 33. Measures have also been discussed with Cambridgeshire County Council (Lead Local Flood Authority) (26 December 2021) with regard to the issue of site access in the event of a breach in the flood defences
- 13.4.24 A response was received which highlighted that the Proposed Development would likely be vulnerable to water shortages and resulting water stress whilst it was questioned why the Proposed Development could not use a closed loop system to capture, store and treat rainwater. In response the Applicant can confirm that it had indicated that the water demand of the EfW CHP Facility would be high because it allows for the full CHP steam supply with zero condensate return as a worst-case scenario. In typical operating conditions however the water demand is significantly lower and although there is limited demand for reuse of surface water runoff in the process the Proposed Development will reuse as much water as possible. The Applicant is also now proposing to use grey water recycling to the administration building.
- 13.4.25 A request was received that the Applicant ensure no pollution or foreign material be deposited into an open watercourse during construction and operation and that this could require a suitable pollution retention device. The Applicant has set out measures to prevent pollution to watercourses during construction within the **Outline CEMP (Volume 7.12)**.
- 13.4.26 It was also recognised that the Proposed Development could help reduce discharge flows into local drainage systems and the Applicant can confirm that the water discharges from the EfW CHP Facility into the Hundred of Wisbech IDB drains will be limited to greenfield runoff rates using SuDS as agreed with Hundred of Wisbech IDB on consultation calls on 14 December 2021. This will ensure that runoff will not increase due to the Proposed Development.



- 13.4.27 A comment was received which highlighted that no Drainage Management Plan had been provided with the PEIR. The ES now includes an **Outline Drainage Strategy** as **Appendix 12F (Volume 6.4)** to **ES Chapter 12 Hydrology (Volume 6.2)**.
- 13.4.28 Clarification was requested on the impact to flood risk resulting from the construction of the 15m waste bunker. This was required to enable the respondent to fully consider the flood risk impacts of the development on the surrounding area. The Applicant's **Flood Risk Assessment** which is **Appendix 12A (Volume 6.4)** to **ES Chapter 12 Hydrology (Volume 6.2)** notes that groundwater dewatered from its excavation is to be discharged to HWIDB drains and will be subject to a Land Drainage Consent from the HWIDB. Discharges would be temporarily halted if a flood alert or flood warning is in place downstream (and the on-site discharges could feasibly contribute to the flood event). Furthermore, it has been agreed with the EA that there is no potential loss of floodplain storage due to the EfW CHP Facility site because it is not predicted to flood both in the 0.5% AEP (design flood event under PPG) and 0.1% AEP overtopping events (plus climate change).
- 13.4.29 A comment which linked both hydrological and ecological impacts suggested that the Proposed Development could result in the pollution of or endanger local land and rivers, dykes and drains. In combination, they also identified that species such as newts and natterjack toads exist on pylon sites and many of the local waterways are home to species of eels, water voles and seals, all of which could be affected by the Proposed Development
- 13.4.30 The Applicant has undertaken ecological surveys to identify the presence or absence of many species. It has also amended the Proposed Development since PEIR such that there will be no requirement for an overhead line to facilitate the Grid Connection and thus, no poles. The ecological surveys have concluded that there is no suitable aquatic breeding habitat for the amphibian species referred to within or adjacent to the Order limits that would be affected by the Proposed Development. Nevertheless, as a precaution, the Applicant has developed an Outline Ecological Mitigation Strategy provided as part of the **Outline CEMP (Volume 7.12)** which includes sensitive working methods that would minimise the risk of harm to amphibian species such as these in the unlikely event that they are present, and other species such as common toad.

Historic Environment

- 13.4.31 A comment was received which states that the PEIR did not consider the potential impacts to heritage assets and their setting due to odours, noise or pollution created by the Proposed Development. The Applicant has therefore predicted and assessed construction noise at the nearest heritage assets to determine the potential for likely significant effects at these locations. The settings assessment also takes account of the potential for other, non-visual effects as advised in Historic England's Good Practice Advice Note 3. The assessment is presented in **ES Chapter 10: Historic Environment, (Volume 6.2)**.
- 13.4.32 A request was made for a photomontage of key viewpoints to be provided to clarify the impact on views towards the Proposed Development from affected heritage assets. The Applicant has therefore prepared a photomontage from within Wisbech



Conservation Area at North Brink. This is included as a figure (**Volume 6.3**) to ES **Chapter 9: Landscape and Visual (Volume 6.2)** and it has been used to inform the historic environment assessment reported in ES **Chapter 10: Historic Environment (Volume 6.2)**.

- 13.4.33 A respondent identified that the impact of the Grid Connection on listed buildings at Oxburgh Hall had not been analysed and whilst the construction and operation of the Grid Connection will not directly affect the hall the potential for effects on its setting are now assessed in ES **Chapter 10: Historic Environment (Volume 6.2)**.
- 13.4.34 It was recommended that the final assessment of heritage assets examine all potential impacts more thoroughly than in the PEIR, including consideration of the visibility of the Proposed Development from local conservation areas and listed buildings. The PEIR provided a preliminary assessment of potential impacts and the assessment of effects on the settings of heritage assets within the ES has been undertaken and is presented in ES **Chapter 10: Historic Environment (Volume 6.2)**. It is informed by the ZTV and other visualisations as required which support the assessment of effects upon setting.
- 13.4.35 A request was made that the Applicant avoid or minimise impacts on the historic environment with any harm caused to be supported by sufficient justification in line with the NPPF. The Proposed Development has been amended subsequent to the PEIR such that the Grid Connection option to Walpole has been removed whilst the chosen option to Walsoken is now proposed to be underground its entire length. These changes help to minimise effects on the historic environment from this component of the Proposed Development.

LVIA (Landscape and Visual impacts)

- 13.4.36 A respondent noted that the LVIA followed most of the principles set out within GLVIA3 but highlighted that new guidance from the Landscape Institute on landscape value should be incorporated into the Landscape and Visual Impact Assessment (LVIA). The Applicant has discussed and consulted upon the methodology used to undertake the assessment with CCC's appointed landscape consultants. They have agreed that the approach as set out in the PEIR is acceptable and complies with GLVIA3. Some additional comments were however raised by the consultants and these have been taken forward by the Applicant within the assessment reported within ES **Chapter 9: Landscape and Visual (Volume 6.2)**.
- 13.4.37 A concern was raised with regard to the lack of a cumulative LVIA in the PEIR. The Applicant has subsequently addressed this issue through the preparation of a cumulative landscape and visual assessment. This is reported within ES **Chapter 18: Cumulative Effects Assessment (Volume 6.2)**.
- 13.4.38 A comment was made that the townscape character assessment was unclear as to whether a baseline had been established or if a review of viewpoints has been undertaken. It shared further concern that an assessment of the effects to receptors within the Thomas Clarkson Academy had not been undertaken. Viewpoints have been agreed with the Council's landscape consultants whilst a baseline townscape character assessment was included in the PEIR and is also included as an appendix



to ES **Chapter 9: Landscape and Visual (Appendix 9D in Volume 6.4)**. The Thomas Clarkson Academy is assessed in ES **Chapter 9: Landscape and Visual (Volume 6.2)**.

- 13.4.39 A request was received that the proposed Landscape Strategy be designed using the ecological mitigation hierarchy and with the aim to maximise BNG. The Applicant has prepared an **Outline Landscape and Ecological Management Strategy (Figure 3.14, Volume 6.3)** and this is designed to maximise biodiversity net gain and also includes for measures related to buildings such that the administration building will include a green wall and brown roof.
- 13.4.40 With regard to trees, it was suggested that the Proposed Development provide a detailed tree planting scheme for the replacement of any trees lost during construction and to provide a net gain in tree assets within the area. The Applicant has undertaken a tree survey of areas where there is the potential to remove trees. This is submitted as **Tree Survey (Volume 7.13)**. The Applicant has committed to the planting of new trees as part of the landscape strategy for the Proposed Development.
- 13.4.41 Comments were made with regard to the lack of a ZTV for the plume which could be emitted from the chimneys. The Applicant has prepared a plume ZTV and this is provided in the figures (**Volume 6.3**) which accompany ES **Chapter 9: Landscape and Visual (Volume 6.2)**.
- 13.4.42 A concern was expressed that the Proposed Development is not sensitive to the environmental, social, artistic, or cultural value associated with the English countryside and the Fens landscape.
- 13.4.43 The Applicant has sought to minimise the built volume of the Proposed Development where technically possible, noting there has been a reduction in the vertical limit of deviation between PEIR and ES that is, the proposed buildings will be lower than assessed at PEIR. The selection of cladding materials to both minimise visual impact and provide a high quality architectural solution has been developed between PEIR and ES submission. Potential design motifs to reflect the local context have been considered, however the final design will be subject to a DCO Requirement.

Noise and vibration

- 13.4.44 A number of specific methodological comments including the locations for noise monitoring were received from Fenland District Council. These have been agreed in subsequent consultation between the Applicant and relevant Council officer.
- 13.4.45 A concern was received regarding the noise impact during construction of the Grid Connection, including from Horizontal Directional Drilling and the potential for night-time noise from pumps where drilling will take place. The Applicant does not now propose to use HDD to construct the Grid Connection, although it does remain one of two options to cross the A47 to install the Water Connection.
- 13.4.46 A comment was made about the lack of traffic data within the PEIR Chapter 7 Traffic and Transport, which was considered to affect the robustness of the noise



assessment and any conclusions regarding noise effects based upon it. The Applicant has subsequently undertaken baseline traffic surveys at all road links requested by NH and CCC, and this data has been used to inform the assessment presented in ES **Chapter 6: Traffic and Transport (Volume 6.2)** and **Chapter 7: Noise and Vibration (Volume 6.2)**.

- 13.4.47 A related comment concerning the lack of baseline noise data noted that there was no baseline noise information for receptors potentially affected by the combined heat and power connection or Grid Connection included in the PEIR NTS. The Applicant has subsequently undertaken baseline noise monitoring at locations agreed with Fenland District Council. Rather than presenting baseline data in the NTS which is, by its nature, a summary document, an outline of the baseline noise assessment is presented within ES **Chapter 7: Noise and Vibration (Volume 6.2)** and full details are presented in **Appendix 7A: Baseline Noise Monitoring Report (Volume 6.4)**.

Monitoring, reporting, enforcement and management and mitigation

- 13.4.48 Respondents made comments on the contents of the draft Outline CEMP submitted with the PEIR. They suggested that the final Outline CEMP should incorporate the embedded environmental measures to protect biodiversity as set out in PEIR Chapter 11, Section 11.7 and that it should include an Ecological Mitigation Strategy and Invasive Species Management Plan. The **Outline CEMP (Volume 7.12)** has been redrafted following PEIR and it does now include measures to protect biodiversity during construction. Appendix D is the Outline Ecological Mitigation Strategy. The **Outline CEMP (Volume 7.12)** includes reference to measures to control any invasive species.
- 13.4.49 A suggestion was made that detailed method strategies be produced to appropriately manage any archaeological potential on the Proposed Development site and Grid Connection sites. The Applicant has committed within the **Outline CEMP (Volume 7.12)** to the preparation of a Written Scheme of Investigation which would include for measures to investigate and record any archaeological features found.
- 13.4.50 On the matter of drainage a comment was received that water discharged into open watercourses during construction and decommissioning be regularly tested to ensure compliance with relevant standards, and that suitable filter strips be installed besides any open watercourse. The **Outline CEMP (Volume 7.12)** includes a protocol for encountering unexpected contamination, including groundwater contamination whilst the **Outline Drainage Strategy (Appendix 12F, Volume 6.4)** includes for a water quality monitoring plan, the provision of oil interceptors and trapped gullies, appropriate storage of chemicals, fuel and oil including implementation of an accident response protocol. The Drainage Strategy will utilise SuDS principles for attenuation storage and treatment to reduce the discharge to greenfield runoff rates and prevent pollution of the water environment.
- 13.4.51 It was suggested that any excavated, imported or exported soils and materials also be regularly tested to meet standards and not placed within 20m of an open watercourse during construction and decommissioning. The Outline Soil Management Plan which forms Appendix C to the **Outline CEMP (Volume 7.12)**



requires that soils are stored away from surface water courses and that potentially contaminated soils and other materials are tested.

- 13.4.52 A question was posed with regard to what emergency plans would be in place for the Proposed Development if the area floods whilst it is operational, and the Applicant has in response prepared an **Outline Emergency Operational Flood Management Plan (Volume 7.9)** which is submitted with the application and which will also be submitted as part of the Environmental Permit Application to the EA.
- 13.4.53 A comment was received that there was not adequate provision for pest and vermin infestations within the CEMP. The consideration of pest and vermin is provided within **ES Chapter 3: Description of the Proposed Development (Volume 6.3)** where the Applicant has confirmed that in order to monitor and control pests, insects and vermin, specialist firms will be contracted undertake regular inspections of the EfW CHP Facility Site. Bait boxes will be maintained around the perimeter of the EfW CHP Facility if required.
- 13.4.54 A concern was raised that the watercourse located between Fountain Frozen Ltd. and the Proposed Development would likely be severely at risk, and it was not included in the CEMP with measures to protect local watercourses. The **Outline CEMP, Appendix B: Outline Water Management Plan (Volume 7.12)** includes measures to control pollution to watercourses and in addition, for the monitoring of watercourse in Section 3.5.
- 13.4.55 A number of requests were made with regard to the monitoring of emissions but with a particular focus upon the potential for effects upon local cattle, crops, vegetation, soils, residents and local water bodies.
- 13.4.56 The Applicant will be required to obtain an EP to operate the Proposed Development and it is the intention to submit the application shortly after the submission of the DCO application. Detailed dispersion modelling has been undertaken, including emissions from road traffic and the assessment also considers dioxins which were identified by some respondents at statutory consultation. The permit will specify the emissions that the EfW CHP Facility would need to monitor to ensure compliance with the ELVs set in the permit. Furthermore and prior to operation the operator of the EfW CHP Facility has to demonstrate to the EA in the permit application that it is using best available techniques for pollution prevention. Other embedded measures include the likely requirement for regular soil and groundwater monitoring at the EfW CHP Facility as a permit condition.



14. Grid Connection

14.1 Introduction

- 14.1.1 As part of the Stage 2 Statutory Consultation, the Applicant sought feedback in relation to the design of the Proposed Development, its impacts and the mitigation measures proposed to reduce the impacts of the Proposed Development on the local environment and community.
- 14.1.2 This chapter provides a summary of the relevant Grid Connection consultation feedback received from prescribed consultees, local authorities, members of the public and wider Stakeholders grouped under the following headings:
- Grid Connection general;
 - Walpole Connection option; and,
 - Walsoken Connection option.
- 14.1.3 Where comments have not been received under the headings above, these have been removed to reflect this. The issues raised by respondents have also been grouped in table form at **Appendix JJ** (Table 7.1), which includes the Applicant's response.

14.2 Section 42 Consultees

Local Authorities

Grid Connection general

- 14.2.1 CCC requested additional survey information regarding the Grid Connection when it is known where the Grid Connection will be and associated highway, ecological, air quality and noise monitoring surveys are completed.
- 14.2.2 KLWN requested clarification on why the Grid Connection cables could not be underground.
- 14.2.3 NCC and NCC Highways commented that both Grid Connection options include underground apparatus being laid longitudinally in the highway, which they advised is only permitted by Statutory Undertakers. They recommended that evidence be provided to NCC that the cable and associated apparatus for the Grid Connection options will be adopted and maintained by a Statutory Undertaker. They said that without this evidence, the Council would object to the Proposed Development.

Walsoken connection option

- 14.2.4 NCC expressed concern that the location of the overhead line poles for the preferred route to Walsoken are not included in PEIR Chapter 3. It considered it was unclear whether new poles would be required or if existing ones could be utilised.



Prescribed Consultees

Grid Connection general

- 14.2.5 National Grid said that any buildings in the Proposed Development must not be built directly beneath their existing overhead line and be no closer than 5.3m to the lowest conductor, as set out in the EN 43-8 Technical Specification Issue 3 (2004). It advised that plant, machinery, equipment, buildings, and scaffolding should not come within 5.3m of any high voltage conductors when they are under their worse conditions of maximum sag and swing. It said that overhead line profile drawings are available to assist in ensuring sufficient clearances.
- 14.2.6 National Grid said that it has full rights of access to retain, maintain, repair, and inspect assets and requested that no structure be built over its high voltage underground cables or within the easement strip. It requested that ground levels above its high voltage underground cables remain unaltered to avoid impacting on the reliability, efficiency, and safety of the electricity network. It further suggested that any proposed changes should be fully consulted on before being implemented.
- 14.2.7 It suggested that the Applicant review the ground conditions, vehicle types and crossing frequencies to determine the type and construction of the temporary raft, required to protect the National Grid gas pipeline from crossings.
- 14.2.8 It requested that no protective measures, such as concrete slab protection, be installed over the National Grid Gas (NGG) pipeline without permission. It advised that NGG pipelines are normally buried to a depth of 1.1m but the actual depth and position should be confirmed on site by trial hole investigation under the supervision of a National Grid representative. It further advised that the ground cover above NGG pipelines should not be increased or reduced.
- 14.2.9 Wisbech Town Council raised concerns that the HDD required for the Grid Connection is not referred to in the PEIR Non-Technical Summary.

Walpole connection option

- 14.2.10 National Grid identified its assets along the Walpole Grid Connection Corridor and substation and advised that protective provisions and wayleave agreements will need to be secured if this option is selected.

Persons with an interest in land (PILs)

Grid Connection general

- 14.2.11 A PIL expressed concern that the Grid Connection route includes a cable running through a residential property, which could devalue the property and prevent the development of additional domestic outbuildings within a certain distance of the cable. They considered that residents would not be eligible for compensation due there not being existing consents in place for these additional outbuildings.
- 14.2.12 Another PIL expressed concerns about the route between Halfpenny Lane and Elm Low Road, advising that a planning application for a high-density residential



development scheme is currently being prepared which could be potentially affected by this route. They requested confirmation of the distance from the A47 of the proposed cable route and the easement widths in proximity of residential developments.

- 14.2.13 A further PIL raised concern that should the proposed CHP Connection be routed along the disused March to Wisbech Railway behind Crown Packaging Manufacturing factory, mitigation measures will be required for fencing and surface water drains in the event of pipe failure and discharge. They identified the existence of Japanese Knotweed on the disused railway and advised that this would likely need to be removed in line with procedures to avoid contaminating the factory site.

14.3 Section 47 Consultees

Members of the public

Grid Connection general

- 14.3.1 A respondent expressed objection to the Proposed Development due to the proximity of the Grid Connection to their property and raised concerns about the impact of the connection on their property's structure, their health and wellbeing, and quality of life. Others raised similar concerns about the impact of the Grid Connection on local communities and animals.
- 14.3.2 Some respondents raised concern about the disruption of routeing the Grid Connection across residential properties and local roads. Others recommended that the location of the Proposed Development should be reconsidered due to it not being in proximity of either of the Grid Connection options. A further respondent suggested that the Proposed Development should be located close to the A17 to reduce the connection length, while others said that the connection could run a shorter distance by being routed alongside the West/North of the A47.
- 14.3.3 A respondent objected to the compulsory purchase of land to lay the Grid Connection, while another stated that none of the options are acceptable in this respect.
- 14.3.4 Some respondents shared concern about the health effects on communities and businesses from the 132kV Grid Connection high voltage cables and queried whether the electromagnetic effects had been assessed.
- 14.3.5 Some consultees expressed concern about the visual impact of overhead lines and pylons resulting from the Grid Connection. A respondent commented that overhead power lines are actively being removed and replaced with underground cables to reduce the visual impact. They said that given the flat landscape around the Proposed Development, overhead lines will be visible for miles. Other responses said that all connections should be undergrounded, or clarity provided on why the connection was not being undergrounded.
- 14.3.6 Some respondents requested more information about the electricity to be generated from the Proposed Development. In particular, comments queried why only



industrial users would benefit from any electricity produced and how much electricity would be sent to the National Grid.

- 14.3.7 One respondent identified that there are two proposed options for connection but said that they were unclear whether these are part of the DCO.

Walpole connection option

- 14.3.8 A respondent expressed concern that if the Walpole connection option is progressed there is a risk that it will impact on the operation of an existing solar farm. They also requested information regarding any operational restrictions surrounding the overhead line infrastructure, either during construction or during the lifecycle of the project.
- 14.3.9 Some consultees expressed concern that the Walpole connection would require the construction of a new overhead line, whereas the Walsoken connection already has this infrastructure in place.

Walsoken connection option

- 14.3.10 Numerous members of the public shared support for the Walsoken connection option due to its shorter connection route. Respondents suggested this would be less intrusive and the best option for local residents. A respondent suggested that that if the Walsoken connection were to be used, it should make use of the existing overhead line to reduce impacts on land and property.
- 14.3.11 A respondent raised concern that Walsoken Substation is not suitable as it does not have sufficient capacity to manage the output from the Proposed Development.

Businesses and Community Groups

- 14.3.12 There were no representations from businesses and community groups in relation to the Grid Connection.

Wider Stakeholders

Grid Connection general

- 14.3.13 Steve Barclay MP expressed concern that the consultation is premature due to the absence on a final decision on the Grid Connection. He considered that a decision on the Grid Connection has been long awaited and said that it was unclear why the developer was unable or unwilling to secure a connection.

14.4 How feedback has influenced the DCO application

- 14.4.1 As outlined above, a range of comments were received from consultees in relation to the Grid Connection. A summary of how feedback has been taken into account in the preparation of the DCO application is provided below with full details of the feedback received and the Applicant's response presented in tabular format in **Appendix JJ** (Table 7.1).



Grid Connection general

- 14.4.2 As part of the project development process, the Applicant considered a number of options for the connection of the proposed EfW CHP Facility to the electricity network. The alternative Grid Connection Routes presented at the Stage 2 Statutory Consultation included for a mixed underground and overhead cable connection between the EfW CHP Facility and either the Walpole or Walsoken Substation Point of Connection (POC).
- 14.4.3 The Applicant reviewed responses received at the Stage 2 Statutory Consultation and feedback received during landowner and ongoing Stakeholder engagement. It concluded that whilst some consultees considered the prospect of any new grid connection unfavourably, those that did express a preference suggested that the connection should be as short as possible and underground rather than partially overhead. Having reviewed consultation responses, the costs of the alternative connections and the environmental sensitivities of both locations the Applicant concluded that the Walsoken DNO Substation POC represented the most appropriate point of connection.
- 14.4.4 Responses to the Stage 2 Statutory Consultation also included an intention by one landowner to submit a planning application for residential development on land north of the A47, between Halfpenny Lane and Elm Low Road. This would have been sterilised in part potentially by the presence of the Applicant's proposed underground cable route. Consultation with National Highways resulted in agreement that the connection could be placed within the verge of the northbound A47 in order to avoid the future residential land. With no in-principle objection to undergrounding within the A47 verge by National Highways, the Applicant also considered a new alternative to the route presented at Statutory Consultation which would consist of a wholly underground connection running within New Bridge Lane, the A47 verge and Broadend Road.
- 14.4.5 Although more expensive than both the underground cable and overhead line, this option would:
- Avoid the visual effects associated with the overhead line option;
 - Minimise effects on ecological and agricultural Receptors during operation;
 - Avoid interaction with National Grid's existing infrastructure;
 - Reduce the number of waterbodies affected; and
 - Result in a reduction in the potential for EMF and noise.
- 14.4.6 As a result, the Applicant concluded that a wholly underground connection within New Bridge Lane, the A47 verge and Broadend Road to the Walsoken DNO Substation POC should form the Proposed Development.
- 14.4.7 In addition to comments about the Grid Connection, consultees expressed concern about the route of the CHP Connection, the design of which was modified subsequent to Statutory Consultation to reduce its visual impact by substituting bellows for expansion loops in the location at which it passes to the rear of residential properties. Consultee comments concerned the potential need for



fencing and surface water drains in the event of pipe failure and discharge and the presence of the invasive species Japanese Knotweed. **ES Chapter 3 Description of the Proposed Development (Volume 6.2)** describes the proposed CHP Connection and how it will operate. Should the CHP Connection fail it would emit steam which would not affect surface water drains. The return pipe passes condensate back to the EfW CHP Facility. Under normal operating conditions the condensate flow (water) would be minimal with higher levels in winter and lower in summer. The condensate temperature, flow and pressure would be monitored, with any sudden change investigated and, if necessary, the system shut down. The Applicant is aware of the Japanese Knotweed and proposes its removal following appropriate procedures which are set out in the **Outline CEMP (Volume 7.12)** submitted as part of the DCO application.

Walpole Connection option

14.4.8 **ES Chapter 3 Description of the Proposed Development (Volume 6.2)** describes the route of the Grid Connection and confirms that the Applicant has chosen to place the Grid Connection underground and in the western verge of the A47 up to Walsoken. As a result the potential interaction with the existing solar farm and National Grid assets has been removed and there is no requirement for protective provisions and wayleave agreements to be secured with these Stakeholders.

Walsoken Connection option

14.4.9 **ES Chapter 3 Description of the Proposed Development (Volume 6.2)** describes the route of the Grid Connection and confirms that the Applicant has chosen to place the Grid Connection underground and in the western verge of the A47 up to Walsoken, as such poles are not required. The Applicant has been provided with a connection offer by UKPN and has discussed and agreed the technical requirements. UKPN has confirmed that the Walsoken DNO Substation is suitable as the POC.



15. Health and Wellbeing

15.1 Introduction

15.1.1 As part of the Stage 2 Statutory Consultation, the Applicant sought feedback in relation to the design of the Proposed Development, its impacts and the mitigation measures proposed to reduce the impacts of the Proposed Development on the local environment and community.

15.1.2 This chapter provides a summary of the relevant Health and Wellbeing consultation feedback received from prescribed consultees, local authorities, members of the public and wider Stakeholders grouped under the following headings:

- Assessment Methodology and Scope;
- Health effects – air quality;
- Health effects – community;
- Health effects – employment, training and economy;
- Health effects – community cohesion and identity;
- Health effects – construction related;
- Health effects – road safety;
- Health and community fund; and,
- Health and property policies.

15.1.3 Where comments have not been received under the headings above, these have been removed to reflect this. The issues raised by respondents have also been grouped in table form at **Appendix JJ** (Table 8.1), which includes the Applicant's response.

15.2 Section 42 Consultees

Local Authorities

Assessment Methodology and Scope

15.2.1 CCC said that multiple hyperlinks within Chapter 16 of the PEIR were broken and as a result source data could not be checked or verified. It expressed concern that the Cambridgeshire and Peterborough Transport and Health Joint Strategic Needs Assessment (JSNA) and Housing Developments and Built Environment JSNA had not been considered in the Chapter. The Council said that parts of the socio-economic chapter, such as Section 16.5.29, used inconsistent data sources for Norfolk and Cambridgeshire. It identified that the NHS data used in paragraphs



16.9.5 to 16.9.9 on the demand for health care services was also not always accurate or up to date.

15.2.2

CCC made a number of suggestions for what should be included within the Health chapter of the ES. The suggestions included:

- A systematic approach be applied to identifying beneficial and adverse impacts.
- A Health Impact Methodology be included to enable the consideration of effects of wider health determinants on the physical and social environment.
- An appraisal of the positive and negative impacts of the Proposed Development on the health and wellbeing of planned new communities and adjacent existing communities.
- That potential distribution effects of health impacts among groups within the population be included through asking 'who is affected' by identified impacts.
- The inclusion of actions and mitigations that minimise potential adverse health effects and maximise positive health effects, referencing the most affected vulnerable groups.
- Cambridgeshire Insight should be used as a desktop data source for Cambridgeshire demographic data, as they considered it unclear whether data from Table 16.4 of PEIR Chapter 16 also covered the County.
- That the Transport and Health JSNA and Housing Developments and Built Environment JSNA be taken into account in the ES.
- Temporary impacts on footpath usage should be considered.
- An additional noise assessment for overhead lines should be undertaken and incorporated into the Chapter.
- Clarification be provided on whether the air quality areas screened out of the PEIR were scoped out as they were considered to have no impact either on air quality or on human health.
- The creation of a Human Health Risk Assessment.
- The NHS data on the demand for health care services presented in paragraphs 16.9.5 to 16.9.9 of the PEIR, and any data on the local NHS capacity should be cross checked with the Cambridgeshire and Peterborough Clinical Commissioning Group to ensure accuracy. The Council also suggested that the Health Assessment regarding the demand for health care services should also include community care services, not just primary care.
- The Chapter should address mitigation measures for noise and vibration.
- The Chapter should provide additional mitigation measures to reduce the impact of operational noise.
- The inclusion of an assessment of chimney and vehicle emissions during abnormal operating scenarios and address additional dispersion modelling and metal deposition.



- Clarification to be provided on whether an assessment has been made on if building air would be released through carbon filters or a permanent odour neutralising system to ensure the atmosphere is protected. The Council also requested clarification on what the health effects of either method would be.

15.2.3 KLWN expressed support with the approach taken to the Health Assessment and agreed that the updated Health Assessment should form part of the ES.

Health effects – air quality

15.2.4 KLWN said that the PEIR does not adequately address the potential effects on air quality, soils and human health. It said that research has shown that small air pollution particles have been revealed on the brain stems of young people, with proteins that are closely associated with Alzheimer's and Parkinson's disease. The Council expressed concern that the Proposed Development could produce emissions that would create these particulates and compromise local people's health.

Health effects – community

15.2.5 CCC expressed concerns that the Proposed Development would disrupt the use of green spaces and footpaths, which they considered would impact on the mental health of local residents. It expressed support for the proposed embedded environmental measures, including continued engagement with communities to address perceived health risks associated with the construction and operation of the Proposed Development.

15.2.6 CCC requested that the opportunities to improve PRow be considered to provide mental health benefits to local communities.

15.2.7 FDC expressed concern about the impact of increased traffic movements on the quality of life of Wisbech residents.

15.2.8 KLWN expressed concern that the Proposed Development had been sited within an area of deprivation in order for the health impacts of the Proposed Development to be masked by deprivation from other sources. It said that the Proposed Development would increase health impacts and inequality rates and would perpetuate existing health and social inequalities, which is contrary to the requirements of the Governments 'levelling up' policy.

15.2.9 The Council raised further concerns over the proximity of the Proposed Development to a secondary school and its potential health effects on young people.

Prescribed Consultees

Health effects – air quality

15.2.10 PHE said that approaches should be put in place to minimise public exposure to non-threshold pollutants, such as particulate matter and nitrogen oxide, in order to minimise public health risks.



Health effects – community

- 15.2.11 PHE highlighted research on the links between emissions from municipal waste incinerators and impacts on health. It said that it was satisfied that modern and well-regulated incinerators are not a significant risk to public health and although adverse impacts on health cannot be ruled out, any impacts are likely to be very small.
- 15.2.12 Wisbech Town Council queried the lack of information relating to health and wellbeing, despite health impacts from odour and air quality being a key concern for local residents.

Health effects – construction related

- 15.2.13 National Grid suggested that the Applicant ensure all relevant site staff be made aware of and understand the Health and Safety Executive's (HSE) Guidance Note GS 6 'Avoidance of Danger from Overhead Lines'. It also suggested that the Applicant consider HSE's guidance document HS(G) 47 'Avoiding Danger from Underground Services' and National Grid's specification T/SP/SSW22 'Safe Working in the Vicinity of National Grid High Pressure gas pipelines and associated installations - requirements for third parties'.

Persons with an interest in land (PILs)

Health effects – air quality

- 15.2.14 A PIL expressed concern that the Proposed Development does not consider the WHO guidance on the siting of Energy from Waste facilities near to residential and agricultural areas. They also raised further concerns about the impact of the Proposed Development on the health of the residents of Wisbech.
- 15.2.15 Another PIL expressed concern about the proximity of the Proposed Development to residential areas and schools. They similarly shared concerns that particulate emissions and resulting air quality impacts would adversely affect the health and wellbeing of residents and young people.

15.3 Section 47 Consultees

Members of the public

Assessment Methodology and Scope

- 15.3.1 Members of the public expressed concern that the Proposed Development did not consider the WHO guidance that EfW developments should be sited over 30 miles away from agricultural land and residential areas. A respondent suggested that no sufficient mitigation can be provided due to non-compliance with this guidance.



Health effects – air quality

- 15.3.2 Many respondents expressed concern about the long-term health impacts from emissions generated by traffic movements associated with the Proposed Development.
- 15.3.3 Many respondents also expressed concern about the health impacts of the Proposed Development on local schools and on young people. Some suggested that emissions could compromise local agricultural land, which is predominantly used for food production.
- 15.3.4 Members of the public highlighted that statistics suggest that living near Energy from Waste facilities or being exposed to resulting emissions increases the risk of health conditions such as respiratory disease, cancer, allergies, obesity and general poor health.
- 15.3.5 Several respondents identified that there could be potential health effects from dioxins, furans and heavy metals within the incinerator bottom ash (IBA) created through the Energy from Waste process. A respondent also suggested the operation of the Proposed Development could lead to the creation of nitrogen dioxide, furans, dioxins, metals, cadmium, and lead, which they considered could result in health impacts such as cancer. They further commented that particulates such as PM2.5 and PM1.0 could enter the heart and lungs and also contaminate local soils. Others raised concerns that the micro pollutants generated by the Proposed Development could be carcinogenic.

Health effects – community

- 15.3.6 Members of the public expressed concerns about the effect of the Proposed Development on the physical and mental health of local communities during the construction and operational phases. These included concerns regarding construction and operational related noise, light, emissions and odour pollution adversely effecting mental health and wellbeing. Some respondents commented that these potential adverse effects would increase demand on the already stretched local NHS services.
- 15.3.7 Respondents also raised concerns that increased traffic and HGV movements would exacerbate safety risks on local roads and that there would be increased risks of electromagnetic radiation resulting from the proposed electricity generator and its associated distribution network.
- 15.3.8 A respondent queried what compensation the Applicant would be providing to local people and communities due to the physical and mental health ill effects of the Proposed Development.

Health effects – employment, training and economy

- 15.3.9 Members of the public expressed concern that other Energy from Waste facilities have sometimes experienced major accidents that compromised the health and wellbeing of local residents and businesses.



- 15.3.10 Several respondents highlighted that there is insufficient historic health data on the potential effects of Energy from Waste facilities for consultees to be able to advise on the potential effects of the Proposed Development.
- 15.3.11 Several respondents also raised concerns regarding the potential need for businesses and especially health facilities to have to relocate due to the adverse effects of the Proposed Development.

Health effects – construction related

- 15.3.12 Some respondents suggested that the potential effects on human health and wellbeing from all the phases of the Proposed Development should be assessed. A further comment received questioned the safety of the facility due to the height of construction works required for the proposed chimney.

Health and property policies

- 15.3.13 A consultee expressed concern that the Proposed Development poses a fire risk to neighbouring residents, businesses and a local hospital.

Businesses and Community Groups

Health effects – air quality

- 15.3.14 CPRE said that small particulate, heavy metals and polycyclic aromatic hydrocarbons created by the Proposed Development, could adversely affect the health and wellbeing of local people. It also commented that these emissions could adversely affect local children and local agricultural land.

Health effects – community

- 15.3.15 Wisbech, March and District Trades Union Council said that the operation of the Proposed Development would compromise the human rights of residents to a peaceful life and private possessions. Wisbech, March and District Trade Union Council expressed concerns regarding the potential adverse mental health and wellbeing effects the Proposed Development would cause on the area.

Health effects – construction related

- 15.3.16 Wisbech, March and District Trade Union Council stated they had concerns regarding the potential mental health and wellbeing effects the construction phase would cause on the area and local residents.

Health and property policies

- 15.3.17 CPRE said that the Proposed Development should be registered and managed as a Control of Major Accident Hazards (COMAH) site due to the handling of high volumes of waste of a flammable nature, and the fire risk this causes to local residents, schools and businesses.



Wider Stakeholders

Assessment Methodology and Scope

- 15.3.18 Cambridge Friends of the Earth said that the Proposed Development did not consider the WHO guidance that EfW developments should be sited over 30 miles away from agricultural land and residential areas.
- 15.3.19 It identified that the cadmium levels produced by the Proposed Development could exceed FAO/WHO daily limits and further stated that, in their opinion, the Applicant was not properly considering the advice provided within EU Directives. It also said that any quantity of heavy metals produced by the Proposed Development poses some form of human health risk.
- 15.3.20 South Wootton Parish Council expressed concern about the increase in health issues and respiratory diseases due to adverse effects on air quality from increases in HGV traffic and the emission of particulates, such as PM 2.5 and PM10. It also expressed concern about the health impacts arising from the emission of toxic metals such as Mercury and Lead, as they are present in the residual ash collected at the bottom of incinerators.

Health effects – air quality

- 15.3.21 Cambridge Friends of the Earth expressed concern that the emissions produced by the Proposed Development and the traffic it would generate, would compromise local air quality. It also identified that due to this, the Proposed Development could increase the cases or severity of respiratory illnesses in the local area.
- 15.3.22 Cambridge Friends of the Earth highlighted that the Proposed Development could emit chemicals such as nitrogen oxide, carbon monoxide, heavy metals, arsenic, nickel, aromatic hydrocarbons and cadmium and allow for these chemicals to accumulate in the local area. It said that these chemicals could harm the health and wellbeing of local residents, especially those located close to the Proposed Development or located downwind of it, who could be at greater risk of cancer. It advised that targets should be set to ensure the Proposed Development does not produce too many of these chemicals and enable them to enter into the local food chain. It also raised concerns that any IBA produced would compromise the health and wellbeing of local residents.
- 15.3.23 Fenland and West Norfolk Friends of the Earth expressed concerns that the Proposed Development produces toxic pollutants which could adversely affect the health and wellbeing of local people and local agricultural land.

Health effects – community

- 15.3.24 Cambridge Friends of the Earth said that the negative effects of the Proposed Development are not related to just emissions, and that the noise, light and odours produced by the Proposed Development would cause considerable harm to residents.



- 15.3.25 Fenland and West Norfolk Friends of the Earth expressed concerns regarding the potential adverse mental health and wellbeing effects the Proposed Development would cause on the area.

Health effects – construction related

- 15.3.26 Fenland Friends of the Earth stated they had concerns regarding the potential mental health and wellbeing effects the construction phase would cause on the area and local residents.

Health effects – employment, training and economy

- 15.3.27 Fenland and West Norfolk Friends of the Earth expressed concerns regarding the Proposed Development releasing harmful emissions into the atmosphere, which could affect local food production.

15.4 How feedback has influenced the DCO application

- 15.4.1 As outlined above, a range of comments were received from consultees in relation to health and wellbeing. A summary of how feedback has been taken into account in the preparation of the DCO application is provided below with full details of the feedback received and the Applicant's response presented in tabular format in **Appendix JJ** (Table 8.1).

Assessment Methodology and Scope

- 15.4.2 As part of the Stage 2 Statutory Consultation the Applicant presented the preliminary findings of the health and wellbeing assessment in Chapter 16 of the PEIR. The approach taken to the health and wellbeing assessment presented in **ES Chapter 16: Health (Volume 6.2)** was agreed with PHE and other consultees. In response to feedback received as well as ongoing engagement with Stakeholders the Applicant has reviewed its proposals and updated its assessments accordingly. This includes providing additional information and reviewing the assessment of likely significant effects and updating the assessments to reflect the other ES chapter updates.
- 15.4.3 Comments were received during the Stage 2 Statutory Consultation suggesting that hyperlinks within the PEIR were either not present or that links did not work, making it difficult for Stakeholders to verify source data. The Applicant reviewed the PEIR and could find no such issues. With regard to the preparation of the ES, the Applicant reviewed the available advice notes from PINS and note that PINS request that hyperlinks are avoided within application documents. As such they are not included in the ES.
- 15.4.4 Within the PEIR published at the Stage 2 Statutory Consultation potential effects on PRoW were considered. The Applicant can confirm that the Proposed Development will not directly cross a PRoW. Opportunities to improve PRoW for the benefit of local communities could be considered via the **Outline Community Benefits Strategy (Volume 7.14)** which provides the opportunity for local environmental



works to be funded in the local area. With regard to the Grid Connection, requests were made for an additional noise assessment for overhead lines. The Applicant can confirm that the Grid Connection option features no overhead line sections.

15.4.5 As part of ES **Chapter 18: Cumulative Effects Assessment (Volume 6.2)**, the Applicant can confirm that the Cambridgeshire Insight and the Transport and Health Joint Strategic Needs Assessment (JSNA) has been reviewed and the relevant data has been incorporated in to the ES baseline.

15.4.6 Comments were received during the Stage 2 Statutory Consultation requesting that a Human Health Risk Assessment (HHRA) is provided. The Applicant has undertaken the required HHRA, the results of which are reported within ES **Chapter 8: Air Quality (Volume 6.2)**, the wider determinants of health are considered in ES **Chapter 16: Health (Volume 6.2)**. The HHRA provides an assessment of the potential impacts from bioaccumulation of metals in the food chain. The assessment concludes that impacts are not significant.

15.4.7 As part of the ES, an assessment has been completed assessing potential impacts from emissions to air for the full spectrum of air pollutants required by legislation. This includes detailed dispersion modelling. The assessment concludes that impacts are not significant. The air quality assessment has also considered ambient emissions of metals, including cadmium. Metal deposition of cadmium has also been considered and assessed in line with the EA guidance on 'Air Emission Risk Assessment'.

15.4.8 Comments were also received requesting that the demand for health care services should include community care services. The Applicant can confirm that the ES includes commentary on community care services in ES **Chapter 16: Health (Volume 6.2)**, however given the nature of the services it is not anticipated that the Proposed Development will have any significant effects in relation to these.

Health Effects – Air Quality

15.4.9 As part of the Stage 2 Statutory Consultation the Applicant presented the preliminary findings of the air quality assessment in Chapter 8 of the PEIR. In response to the feedback received as well as ongoing engagement with Stakeholders the Applicant has reviewed its proposals and updated its assessments accordingly. Within the ES a comprehensive assessment has been completed assessing potential impacts from emissions to air for the full spectrum of air pollutants required by legislation and the applicable environmental permitting regulations. This included metals, PAHs, PCBs and dioxins. The assessment concluded that impacts are not significant. ES **Chapter 16: Health (Volume 6.2)** relies on the findings of the air quality assessment, including the HHRA.

15.4.10 ES **Chapter 8: Air Quality (Volume 6.2)** and **Appendix 8B: Air Quality Technical Report, Annex G (Volume 6.4)** presents the detailed dispersion modelling that has been undertaken. It considers air quality objectives set for the protection of human health and includes traffic modelling, demonstrating negligible levels of significance. The assessment was undertaken considering air quality objectives set for the



protection of human health including impacts of air pollutants on respiratory disease. The assessment concluded that impacts are not significant.

- 15.4.11 A HHRA has been undertaken, the results of which are reported in ES **Chapter 8: Air Quality (Volume 6.2)** whilst the wider determinants of health are considered in ES **Chapter 16: Health (Volume 6.2)**. The HHRA provides an assessment of the potential impacts from bioaccumulation of metals in the food chain. In addition, metal deposition has also been presented in line with the EA approach. The assessment concludes that impacts are not significant. In addition, metal deposition calculations were undertaken in line with EA guidance. Potential impacts were not significant.
- 15.4.12 The Applicant recognises that concerns were raised with regard to emissions from the Proposed Development. A chimney height assessment has been undertaken to ensure adequate dispersion and that predicted concentrations of pollutants are not significant and below the relevant objectives, minimising potential impacts on relevant human and ecological Receptors. The Applicant can confirm that incinerator bottom ash and APCr handling and storage will be within enclosed buildings and will be taken off site for recycling and disposal respectively. Therefore, no impacts to public health from bottom ash or APCr are expected.

Health effects – community;

- 15.4.13 The Applicant recognises that in their responses to the Stage 2 Statutory Consultation a number of consultees expressed concern about the potential health effects of the Proposed Development on the local community. These included concerns around the impact of increased traffic movements, the effects on the health of the local community and local schools, the effects of noise, light, air quality and odour, the effects of electromagnetic radiation and the effects on physical and mental health. As noted in NPS EN-5, EMF intensity is less of an issue with voltages of 132kV or lower and decreases with distance. The Grid Connection is proposed at 132kV.
- 15.4.14 The ES that is submitted in support of the DCO application considers a range of topics that have the potential to affect human health during construction and operation. These include, **Chapter 8: Air Quality (Volume 6.2)**, **Chapter 7: Noise and Vibration (Volume 6.2)** and **Chapter 6: Traffic and Transport (Volume 6.2)**. External lighting will be designed to avoid unnecessary light pollution and minimise impacts on Receptors. Odour is considered as part of ES **Chapter 8: Air Quality (Volume 6.2)**. An Odour Management Plan will be prepared as part of the EP for the EfW CHP Facility.
- 15.4.15 ES **Chapter 16: Health (Volume 6.2)**, undertakes an assessment of the potential for the Proposed Development to significantly affect human health, drawing on information from the above chapters of the ES and HHRA. It follows a methodology developed in consultation with the host authorities and the former PHE and concludes that effects will not be significant such that mitigation (for example a fund) is not required. Notwithstanding the conclusions of the assessment, the Applicant is proposing a local community fund.



- 15.4.16 Consultees also commented that the Proposed Development would disrupt the use of green spaces and footpaths or that opportunities to improve PRoW should be considered to provide mental health benefits. The Applicant can confirm that the Proposed Development will not directly cross a PRoW. Opportunities to improve PRoW for the benefit of local communities could be considered via the **Outline Community Benefits Strategy (Volume 7.14)** which provides the opportunity for local environmental works to be funded in the local area.
- 15.4.17 Concerns were raised during the Stage 2 Statutory Consultation that the Proposed Development would compromise the human rights of residents. Other comments received also said that the ES must demonstrate that any potential significant effects are addressed. The ES assesses the potential for significant effects against a number of environmental topics. Where significant effects are identified, mitigation measures are proposed where available. The Applicant has also prepared management plans to manage the effects arising from construction and operation and these include documents such as the **Outline CEMP (Volume 7.12)** and **Outline CTMP (Volume 6.4)**.

Health effects – employment, training and economy;

- 15.4.18 The Applicant recognises that some consultees have expressed concerns about the effect of the proposed EfW CHP Facility on the health and wellbeing of local residents and businesses, including through effects on the food chain. In its response to the Scoping Opinion, PHE indicated that it has reviewed research undertaken to examine the suggested links between emissions from municipal waste incinerators and effects on health. PHE's risk assessment remains that modern, well run and regulated municipal waste incinerators are not a significant risk to public health.
- 15.4.19 As part of the DCO application a HHRA has been undertaken to assess potential impacts from bioaccumulation of deposition in the food chain. The assessment concludes that impacts are not significant. In addition, metal deposition calculations were undertaken in line with EA guidance. Potential impacts were identified as not significant.
- 15.4.20 The Applicant recognises that some consultees raised concerns about the risk of major accidents. As part of the development of its proposals the Applicant has carefully considered the potential for accidents that may arise as a consequence of the Proposed Development. At the Scoping stage, a qualitative risk assessment was undertaken and determined there was not a significant risk of Major Accidents due to the Applicant's processes and the existing regulatory requirements. This was agreed by the Planning Inspectorate and not challenged by any consultees. The ES **Chapter 17: Major Accidents and Disasters (Volume 6.2)** provides details on how those processes will work and will be secured.

Health effects – construction related;

- 15.4.21 The Applicant recognises that some consultees have expressed concern about the effect of construction of the Proposed Development on the health and wellbeing of communities. ES **Chapter 16: Health (Volume 6.2)** sets out relevant measures as



part of the consideration of embedded mitigation to address concerns that might impact on mental health. Relevant chapters of the ES also include consideration of factors that might impact on human health, including air quality, noise and transport.

- 15.4.22 As part of the construction of the project, consideration will be given to the HSE's guidance document HS(G) 47 and National Grid's specification T/SP/SSW22. The CEMP which will be produced by the construction contractor will include reference to safe working in the vicinity of infrastructure such as gas pipelines and (underground and overhead) electricity lines, including specific guidance where this is available.

Health and property policies

- 15.4.23 The Applicant recognises that local people have expressed concern about the risk of fire due to the operation of the Proposed Development on local residents and businesses. The Proposed Development has been carefully designed to minimise the risk of a fire and will be developed in line with both regulatory requirements (the Building Regulations 2010 and the Regulatory Reform (Fire Safety) Order 2005) and industry good practice (NFPA 850). The risk of fire is considered in ES **Chapter 17: Major Accidents and Disasters (Volume 6.2)** and is not considered to be significant.
- 15.4.24 The Proposed Development is not a COMAH Establishment. It is not expected that the facility will handle significant (if any) volumes of flammable material. Most of the waste will be combustible solids. If the site were to store flammable materials above the thresholds within the COMAH regulations, then it would be regulated by them. However, if the site does not store 'qualifying inventories' (and it will not), then it would be inappropriate and impossible to apply the regulations to the site. It would be out of sync with the remainder of the waste inventory and would likely be considered unacceptable to the regulator. Other regulatory regimes will apply and be enforced by the appropriate regulator, HSE or the EA.



16. Operations

16.1 Introduction

16.1.1 As part of the Stage 2 Statutory Consultation, the Applicant sought feedback in relation to the design of the Proposed Development, its impacts and the mitigation measures proposed to reduce the impacts of the Proposed Development on the local environment and community.

16.1.2 This chapter provides a summary of the relevant Operations consultation feedback received from prescribed consultees, local authorities, members of the public and wider Stakeholders grouped under the following headings:

- Ash management and disposal
- Compliance and monitoring
- Energy generation
- Operational impacts
- Operating times and lifespan
- Waste supply and contracts

16.1.3 Where comments have not been received under the headings above, these have been removed to reflect this. The issues raised by respondents have also been grouped in table form at **Appendix JJ** (Table 9.1), which includes the Applicant's response.

16.2 Section 42 Consultees

Local Authorities

Ash management and disposal

16.2.1 KLWN requested clarification on how the bottom ash is disposed of, and if it would be disposed of on or off site.

Operating times and lifespan

16.2.2 CCC said that the operating hours for the Proposed Development should end at 6pm at the latest.

Operational impacts

16.2.3 KLWN said that incinerators are at risk of fires and expressed concerns that the Proposed Development will have an adverse impact on Norfolk's fire response as a result.



Prescribed Consultees

Compliance and monitoring

- 16.2.4 The HSE identified that Hazardous Substances Consent would be required to store or use any named hazardous substances or categories of substances.

Persons with an interest in land (PILs)

- 16.2.5 There were no representations from PILs in relation to operations.

16.3 Section 47 Consultees

Members of the public

Ash management and disposal

- 16.3.1 Several members of the public requested clarification about what would happen to the generated ash from the incineration process and where it will end up.

Compliance and monitoring

- 16.3.2 A respondent requested clarification about the process and procedure required to assess and properly sort waste prior to incineration to ensure that it is suitable for incineration.
- 16.3.3 A respondent enquired if the Applicant is certified to any British Standards and another asked what standards the operation of the Proposed Development would need to accord with.
- 16.3.4 A respondent requested information regarding the decommissioning of the Proposed Development and the assurances/agreements that would be put in place to ensure decommissioning is carried out.

Energy generation

- 16.3.5 A member of the public expressed concern that the benefits of generating electricity from the Proposed Development will not be sufficient to offset its impacts on the local community.
- 16.3.6 Another respondent said that there is insufficient demand from local businesses for the use of the steam and heat generated from the Proposed Development to meet its stated efficiency.

Operating times and lifespan

- 16.3.7 A respondent requested clarification about the operational life of the Proposed Development. Another queried the intended timeframes for the operational lifespan and decommissioning of the Proposed Development.



- 16.3.8 A respondent highlighted that clarification on the expected timescale for the Proposed Development to reach the 50MW threshold for NSIPs should be provided.

Operational impacts

- 16.3.9 A respondent expressed concern that the filters being applied to the Proposed Development do not prevent PM1 particles, CO₂, NO_x, Furans, PM 2.5 particles, gases like Ammonia, or heavy metals like Mercury and Lead, for which there are no safe limits. Another commented that the Proposed Development would result in more by products, due to the use of incineration, than if the waste was disposed of in other ways.
- 16.3.10 One respondent expressed concerns relating to potential operational failures and the risk of harm and disturbance these would cause to local communities. Another requested more information about how the Proposed Development would prevent the pollution of local waterways from operational discharges.

Waste supply and contracts

- 16.3.11 Several respondents requested information about the procedures and processes the Applicant will implement to manage subcontractors and ensure that they fulfil their requirements.
- 16.3.12 A respondent enquired if the Applicant specifies within their contracts with waste suppliers the type of waste and materials that are required. Similarly, several respondents expressed concern that the Proposed Development would result in the use of clinical waste.
- 16.3.13 A respondent expressed concern that not all the received waste will be assessed before being incinerated. Several also commented that further information and assurances were required regarding where waste would come from.
- 16.3.14 Several respondents expressed concern that local authorities will be tied into waste management contracts with the Applicant even if environmental legislation changes to prohibit incineration.
- 16.3.15 A respondent expressed concern that the consultation did not provide any information on the potential for fires at the Proposed Development and how they would be dealt with. They further highlighted that fire services for the area are limited and that this issue needs to be properly considered and consulted upon.

Businesses and Community Groups

- 16.3.16 There were no representations from businesses and community groups in relation to operations.



Wider Stakeholders

Ash management and disposal

- 16.3.17 Cambridge Friends of the Earth expressed concerns about the generation of bottom ash and APCr and how these elements would be managed.
- 16.3.18 Steve Barclay MP objected to the Proposed Development due to its generation of hazardous waste and due to the supporting documentation not providing adequate information about this element.

Compliance and monitoring

- 16.3.19 Cambridge Friends of the Earth said that environmental inspections should be carried out through unannounced site visits. They also expressed concerns that the EA's emissions monitoring standards are inadequate.

Operating times and lifespan

- 16.3.20 Steve Barclay MP queried how the Proposed Development could claim to be operational 91% of the time, as he considered this figure unrealistic.

Operational impacts

- 16.3.21 Steve Barclay MP objected to the Proposed Development due to it treating waste through incineration when most of the waste could be recycled and treated in less harmful ways.

Waste supply and contracts

- 16.3.22 Cambridge Friends of the Earth expressed concerns about the processing of waste Nickel Cadmium batteries, which are a common form of cadmium contamination which could enter the waste stream.

16.4 How feedback has influenced the DCO application

- 16.4.1 As outlined above, a range of comments were received from consultees in relation to the operation of the Proposed Development. A summary of how feedback has been taken into account in the preparation of the DCO application is provided below with full details of the feedback received and the Applicant's response presented in tabular format in **Appendix JJ** (Table 9.1).

Ash management and disposal

- 16.4.2 As part of the Stage 2 Statutory Consultation the Applicant presented the preliminary description of the Proposed Development in Chapter 3 of the PEIR. In response to feedback received as well as ongoing engagement with Stakeholders the Applicant has reviewed its proposals and updated this description accordingly. This includes providing additional information and addressing discrepancies noted by consultees.



The updated description of the Proposed Development is presented in ES **Chapter 3: Description of the Proposed Development (Volume 6.2)** which accompanies the DCO application.

- 16.4.3 ES **Chapter 3: Description of the Proposed Development (Volume 6.2)** describes the process for dealing with Incinerator Bottom Ash (IBA)¹¹ and APC residues (APCr)¹². It states that the IBA would be sent to a suitably licenced facility in the UK, for recycling, where metals contained within the IBA would be extracted and the remainder reclaimed for use as secondary aggregate. Fly ash collected with APCr would be disposed of off-site at a suitably licensed hazardous waste landfill facility. Alternatively where possible fly ash could be sent for recycling if the appropriate technology and facilities are available at the time of requirement.

Compliance and monitoring

- 16.4.4 Comments were received which requested that assurances/agreements would be put in place to ensure that decommissioning of the Proposed Development be carried out. ES **Chapter 3: Description of the Proposed Development (Volume 6.2)** confirms that the Proposed Development will be decommissioned at the end of its operational life. It sets out that the decommissioning is anticipated to take 1- year and the appropriate decommissioning and reinstatement activities will be undertaken in accordance with a scheme which will first be agreed with the relevant local authority. The decommissioning scheme will be a DCO Requirement.
- 16.4.5 The Applicant can also confirm that a robust 'non-conforming deliveries' procedure will be put in place which aims to intercept any non-conforming waste at the point of delivery. This has proven effective at their other UK facilities where such procedures are already implemented.

Energy generation

- 16.4.6 The Applicant considers that benefits (including those associated with generating electricity) arising from the Proposed Development are such that the DCO application should be consented. Further information on the planning balance, which has been undertaken is presented within the **Planning Statement Volume 7.1)** which accompanies the DCO application.
- 16.4.7 ES **Chapter 2: Alternatives (Volume 6.2)** explains the reason for selecting the location of the Proposed Development. One of the reasons for selecting the location for the Proposed Development is that it is in close proximity to industrial users of

¹¹ IBA is a form of ash produced in incineration facilities. This material is discharged from the moving grate at the base of municipal solid waste incinerators. Once IBA is processed by removing contaminants, it can be used as an aggregate substitute.

¹² APCr or fly ash are generated from processes associated with the operation of and other thermal waste treatments. Fly ash is fine particulate matter carried with flue gases, which collects in the chimneys of thermal waste treatment plants. Fly ash is considered a hazardous waste material and requires specialist disposal



heat/steam. Indeed, the UK CHP Development Map which is referred to in ES **Chapter 2: Alternatives (Volume 6.2)** shows Wisbech as having three large heat load locations which is more in one town than in any other town or city in Cambridgeshire. The Applicant has also commissioned a **Combined Heat and Power Assessment (Volume 7.7)** which has validated the information contained within the UK CHP Development Heat Map and demonstrates that there is sufficient potential demand to justify CHP in the location chosen to site the EfW CHP Facility.

Operational impacts

- 16.4.8 The Applicant recognises that concerns have been raised by consultees in relation to the filters being applied to the Proposed Development. ES **Chapter 8: Air Quality (Volume 6.2)** models the level of the residual emissions which would be emitted from the chimneys once the flue gases have been passed through the APC system. The results of the air quality modelling have informed the Human Health Risk Assessment (**ES Appendix 8B: Air Quality Technical Report, Annex G (Volume 6.4)**) which includes a comparison of dioxin/furan exposure with WHO and UK COT Guidance. Considering the worst-case assumptions adopted for the assessment, the contribution of the Proposed Development to the intake of dioxins/furans and dioxin-like PCBs is considered negligible.
- 16.4.9 Information on how the Proposed Development would prevent the pollution of local waterways from operational discharges is provided within ES **Appendix 12F: Outline Drainage Strategy (Volume 6.4)** and in the **Outline CEMP (Volume 7.12)**. Under normal operational conditions there would be no discharge of pollutants to watercourses. Water used in the process is recycled for re-use. Only rainwater will be discharged to local watercourses, and this will be fed through a number of controls before it can be discharged.
- 16.4.10 The Applicant can confirm that the Proposed Development has been designed to minimise the risk of a fire. The risk of fire is considered in the ES **Chapter 17: Major Accidents and Disasters (Volume 6.2)** and is not considered to be significant as the Proposed Development will be developed in line with both regulatory requirements (the Building Regulations and the Regulatory Reform (Fire Safety) Order) and industry good practice (NFPA 850). The Applicant will also prepare a Hazard and Operability (HAZOP) study and has included an **Outline Fire Prevention Plan (Volume 7.10)** with the application.

Operating times and lifespan

- 16.4.11 In response to queries and clarifications about the operational hours of the Proposed Development, ES **Chapter 3: Description of the Proposed Development (Volume 6.2)** sets out that for the acceptance of waste operational hours will be between 07.00 and 20.00. The EfW CHP Facility itself will operate 24 hours a day. The potential for effects upon the local community as a result of operation of the EfW CHP Facility are set out within topic chapters 6 to 17 of the ES. ES **Chapter 3: Description of the Proposed Development (Volume 6.2)** also confirms that the EfW CHP Facility has a design life of 40-years and that it is anticipated it will take around 1-year to decommission it.



- 16.4.12 On completion of commissioning, the Applicant can confirm that EfW CHP Facility will be capable of exporting up to 55 Megawatts electrical (MWe) net (60 MWe gross) of electricity. The Proposed Development will be designed, constructed and commissioned to achieve this from the start of commercial operations.
- 16.4.13 An availability of 90% for a facility such as the Proposed Development is industry standard. The Applicant's comparable UK facilities achieve this level of performance or higher on average. Furthermore, the EPC Contractor will be required to provide a performance guarantee of 8,000h or 91.3% availability.

Waste supply and contracts

- 16.4.14 In response to concerns about the processing of waste Nickel Cadmium batteries, which could enter the waste stream the Applicant will specify the types of material which will be accepted at the EfW CHP Facility and will undertake regular inspections of waste deliveries to check for any materials which should be recycled. The EfW CHP Facility will be operated in accordance with an EP which will define the types of waste that can be accepted. The Applicant has also considered potential emissions of cadmium and nickel from the EFW CHP Facility chimney, including metal deposition on land. The Air Quality assessment concludes the significance of effect on sensitive Receptors is negligible.



17. Socio economic and Community

17.1 Introduction

- 17.1.1 As part of the Stage 2 Statutory Consultation, the Applicant sought feedback in relation to the design of the Proposed Development, its impacts and the mitigation measures proposed to reduce the impacts of the Proposed Development on the local environment and community.
- 17.1.2 This chapter provides a summary of the relevant socio economic and community consultation feedback received from prescribed consultees, local authorities, members of the public and wider Stakeholders grouped under the following headings:
- Assessment methodology and scope;
 - Viability or displacement of businesses or commercial activity;
 - Disruption to residents' economic activity; and,
 - Skills and training in or related to operational development.
- 17.1.3 Where comments have not been received under the headings above, these have been removed to reflect this. The issues raised by respondents have also been grouped in table form at **Appendix JJ** (Table 10.1), which includes the Applicant's response.

17.2 Section 42 Consultees

Local Authorities

Assessment methodology and scope

- 17.2.1 CCC said that the closure of PRoW would require a Traffic Regulation Order under the Road Traffic Regulation Act 1984 rather than Countryside and Rights of Way Act 2000, as stated in Paragraph 3.3.11 of the Traffic and Transport Appendices of the PEIR.
- 17.2.2 CCC also requested additional information regarding the effects of a 30% non-local workforce on local air quality, congestion, school places and early years services.

Viability or displacement of businesses or commercial activity

- 17.2.3 CCC requested that the Proposed Development support local people and businesses and maximise the number of jobs for local residents during the construction and operational phases.
- 17.2.4 FDC said that the Proposed Development would not have any benefits for local communities and would likely hamper the economic growth of Wisbech and its



businesses. It identified that the number of jobs created by the Proposed Development appears minimal, especially when considered against its negative effects. It also expressed concern about disruption from traffic compromising local businesses and workers' commuting and that the visual and health effects of the Proposed Development could deter tourists.

17.2.5 KLWN considered there to be no benefits to locating the Proposed Development in an area dominated by agriculture and agricultural land. It said that potential effects on local food production, including effects on local soils could result in the loss of agricultural accreditation and cause considerable harm to local farming.

17.2.6 South Holland District Council commented upon the Proposed Development and noted that it would employ local people, use local suppliers, enhance local biodiversity features and support or work with local community groups.

Disruption to residents' economic activity

17.2.7 FDC considered that the harm caused by the Proposed Development would outweigh any benefits to local communities, even those benefits that would be generated by a s106 agreement.

Skills and training in or related to operational development

17.2.8 South Holland District Council acknowledged that skills development opportunities would be provided.

Prescribed Consultees

Assessment methodology and scope

17.2.9 Natural England welcomed the consideration of potential effects from the Proposed Development on walkers, cyclists and horse riders. It said that Appendix 6B of the PEIR Chapter 6 did not consider diversions for footpath closures and said that it would welcome suggestions for alternate footpath routes. It requested that any Rights of Way Improvement Plans (ROWIP) identify any PRow within or adjacent to the Proposed Development and that the Plans propose ways in which local public rights of ways could be maintained and enhanced. It further highlighted that the Proposed Development should encourage the use of the countryside for leisure activities and that it should consider the Cambridgeshire Green Infrastructure Strategy.

Viability or displacement of businesses or commercial activity

17.2.10 Emneth Parish Council considered that it was inappropriate to situate the Proposed Development close to high value agricultural land in the locality.



Persons with an interest in land (PILs)

Viability or displacement of businesses or commercial activity

- 17.2.11 A PIL expressed concern that the Proposed Development would result in damage to local property prices and the market. Other PIL queried whether said that compensation would be provided where property prices decrease, and any other financial losses are incurred as a result of the Proposed Development. Another PIL said that the Proposed Development could result in businesses having to relocate due to a lack of industrial space in the area or through having their land purchased.
- 17.2.12 A PIL expressed concern over the intended use of land that is currently allocated for residential development. They requested information on what compensation would be provided if this land were utilised as part of the Proposed Development.
- 17.2.13 PILs expressed concern that the Proposed Development would considerably damage residential areas within the locality. They said that people had invested in the area to make it their home, only for the Proposed Development to compromise their investments. They requested further and specific consultation with themselves and the parties.

Disruption to residents' economic activity

- 17.2.14 Several PILs requested compensation where the value of their homes would decrease as a result of the Proposed Development.

17.3 Section 47 Consultees

Members of the public

Viability or displacement of businesses or commercial activity

- 17.3.1 Members of the public expressed concern that the Proposed Development would not result in any real benefits for local communities or that the Applicant would not deliver community benefits. Many said that instead of providing benefits, the local area and its communities would only be harmed by the Proposed Development.
- 17.3.2 Several respondents said that the heat and power provided by the Proposed Development would not result in a financial benefit to local people who would have to experience the Proposed Development's negative effects. Further comments expressed disappointment that the Proposed Development would deter investment in the local area or would result in the reduction of local property values.
- 17.3.3 Some respondents raised concerns about the impacts on local schools, colleges, retail, tourism and health facilities. Specific concerns regarding tourism highlighted potential impacts on the character and setting of Wisbech and local landscapes. Concerns were also raised about the proximity of the Proposed Development to Thomas Clarkson Academy and other educational establishments and that the



Proposed Development could compromise the regeneration efforts, such as Garden Town aspirations, in Wisbech and its surroundings.

- 17.3.4 Numerous respondents said that the job benefits of the Proposed Development would primarily be within its construction phase, and that only c.40 jobs would be created for the operation of the facility. They also said that the construction and operational staff would likely be recruited from outside the local area due to there being a lack of skills in the local labour market. Further comments considered that the Proposed Development would result in the region losing jobs as businesses locate elsewhere and investors look to other regions to invest in. A few respondents however welcomed the potential economic and investment benefits the Proposed Development could bring to the local area and the jobs it would create.
- 17.3.5 One respondent commented on the innovative nature of the Proposed Development and suggested it could be a tourist attraction for the area, bring benefits to local businesses and communities. Another suggested that the Proposed Development should provide/host educational/inspiration events to improve public and business perception of it. Further comments requested that the Proposed Development provide planting, street cleaning and road repairs in local communities.
- 17.3.6 Other respondents questioned the location of the Proposed Development in a predominantly agricultural area raising concern about the potential contamination of agricultural land and farming crops from emissions and its impact on local food producers and horticultural businesses. Others expressed similar concerns in relation to an increase in the amount of pests in the surrounding area and resulting damage of crops and food production.
- 17.3.7 A respondent highlighted that the pension trust that owns/manages property in the area would likely lose rental revenue as a result of businesses relocating due to the Proposed Development. Another raised concerns that the Proposed Development would result in an increase in insurance premiums for local residents and businesses.
- 17.3.8 A member of the public requested that the Applicant provide compensation to businesses negatively affected by the Proposed Development. Consultees also requested compensation for homeowners who experience devaluation and any other financial loss caused by the Proposed Development. Some consultees raised particular concerns with the residential and commercial properties located around New Bridge Lane and New Drove, as they considered the Proposed Development would likely have significant effect on these properties due to its access and proximity.
- 17.3.9 A respondent requested further information on the benefits to local businesses, such as energy provision from the Proposed Development and the potential re-opening of the adjacent disused March to Wisbech Railway. Some suggested that the Proposed Development could provide energy savings to local businesses. Others requested that the Applicant provide funding for business rate relief for local business affected by the Proposed Development.



17.3.10 Further responses expressed concern that the Proposed Development could compromise the re-opening of the disused March to Wisbech Railway which would negatively affect tourism to the area and local economic growth and regeneration.

Disruption to residents' economic activity

17.3.11 Members of the public expressed concerns about the effect on local retail and the ability of local residents to access local services. Others raised concern that the Proposed Development would dissuade professionals such as teachers, doctors, dentists etc from coming to the area as they would not want to live and work near to the Proposed Development.

17.3.12 Several respondents expressed concern that the Proposed Development would increase deprivation and socio-economic issues within the area. Some said the Proposed Development would adversely impact local businesses and job opportunities, compromising members of the community from achieving a successful life.

17.3.13 Suggestions received from consultees for local improvements and enhancements included:

- A play area on Pickard's Way;
- Provide support and funding for the improvement of Wisbech Town Centre; and
- A coffee shop to be provided in a local housing development.

17.3.14 A respondent queried if the Applicant had considered the effects of the temporary workers and their temporary accommodation on the area. Others questioned whether the Applicant was supporting local communities and schools in the implementation and funding of engineering works, stating that these groups can easily source composting/recycle bins but are less able to carry out fundamental building/engineering programmes. They also requested information about educational and community support provided by the Applicant in other localities.

17.3.15 A respondent requested further information on whether businesses on Algores Way would be subject to compulsory purchase.

Skills and training in or related to operational development

17.3.16 Some members of the public said that the partnership opportunities provided by the Proposed Development would be limited. These comments included suggestions that the Applicant invest in upskilling and providing skilled job opportunities and training for locals. Others expressed support for apprenticeship and training opportunities the Proposed Development could provide.

17.3.17 A respondent requested further information on the potential apprenticeship scheme and work experience placements the Proposed Development could provide to local schools and colleges. Another more generally requested further information regarding on potential community benefits and job opportunities provided by the Proposed Development.



- 17.3.18 Several respondents suggested that waste awareness and education is not needed as such topics are covered in local schools, while others said that waste education was ineffective due to the large existing volume of non-recyclable products and packaging. Some said that better education should be provided to local residents on recycling and waste reduction instead of the Proposed Development.
- 17.3.19 A respondent said that the current educational resources available from the Applicant were insufficient, and that the resources should be linked with the National Curriculum to ensure value is provided. They identified that information on climate change was not provided in the Applicant's educational material and said that any educational activities should be sensitive to the visual, audio, and mental needs of children.

Businesses and Community Groups

Viability or displacement of businesses or commercial activity

- 17.3.20 Commercial Safety Systems Ltd, Engineering & Factory Supplies Ltd and Kirk Coachworks, MJ Acoustics, said that the Proposed Development would not provide benefits to local communities and businesses. They suggested that the Proposed Development would harm local tourism, retail and other business sectors by adversely impacting Wisbech's heritage assets and image.
- 17.3.21 Commercial Safety Systems Ltd, Engineering & Factory Supplies Ltd and MJ Acoustics, raised concerns that the Proposed Development would impact the proposed Wisbech Gateway retail park development and could lead to it relocating elsewhere. MJ Acoustics and Engineering & Factory Supplies Ltd also raised concerns that the Proposed Development would adversely impact on plans for Wisbech to become a Garden Town.
- 17.3.22 Commercial Safety Systems Ltd and Icon Engineering Ltd shared concerns that local businesses would relocate if the Proposed Development gained consent. English Brothers Ltd and WEP Fabricators Ltd said that the number of employment opportunities created would be less than the number lost because of the Proposed Development's impacts on local businesses. English Brothers Ltd also raised concern that the Proposed Development would deter potential employees from moving to the area which would exacerbate existing recruiting issues and staff shortages.
- 17.3.23 Crown Packaging Manufacturing expressed concern that the Proposed Development would adversely affect the working conditions at local businesses. They identified that the Proposed Development has the potential to hamper the manufacturing processes at the factory and that emissions from the Proposed Development would harm local businesses.
- 17.3.24 Elm Road Primary School and Nene and Ramnoth School said that adverse impacts from the Proposed Development on local communities and businesses outweighed potential economic benefits. They suggested that the environment in the local area would be adversely impacted by the Proposed Development. They also raised concern that the Proposed Development would compromise regeneration efforts in



Wisbech. They considered that the Proposed Development would adversely impact local heritage assets, deter tourists from visiting the local area and would harm the social, cultural, and economic life of Wisbech.

17.3.25 Fascinating Fens said that the Proposed Development would impact the growing local tourism industry as the buildings, emissions and HGV movements would make Wisbech less attractive and deter tourists from visiting.

17.3.26 Kirk Coachworks said that the increase in traffic resulting from the Proposed Development would compromise local road infrastructure and make local commuting difficult. It suggested that this would create further financial costs for businesses.

17.3.27 Wisbech, March and District Trades Union Council said that adverse impacts from the Proposed Development on local communities and businesses outweighed potential economic benefits. They also suggested that the environment in the local area would be adversely impacted by the Proposed Development.

17.3.28 Wisbech, March and District Trades Union Council expressed concern that only a small number of the employment opportunities generated by the Proposed Development would be filled by locals, and that the number of employment opportunities predicted to be created was inaccurate and overstated. It suggested that the Proposed Development would result in the loss of jobs in the local area, including at the Wisbech Gateway development, which they considered to offer greater benefit to the local economy than the Proposed Development.

Skills and training in or related to operational development

17.3.29 Commercial Safety Systems Ltd, Engineering & Factory Supplies Ltd, Kirk Coachworks and MJ Acoustics, expressed concern about the limited number of employment opportunities created by the Proposed Development.

17.3.30 Elm Road Primary School and Nene and Ramnoth School said that the number of employment opportunities created by the Proposed Development was not sufficient to offset the adverse impacts on local businesses.

17.3.31 Icon Engineering Ltd, Engineering & Factory Supplies Ltd and MJ Acoustics, expressed similar concerns that the employment opportunities created would not be filled by local residents due to the lack of relevant skills in the local labour market. They further commented that employment opportunities during construction would likely be filled by large contractors with few opportunities created for local construction firms.

Wider Stakeholders

Assessment methodology and scope

17.3.32 Steve Barclay MP said that the Residential Visual Amenity Assessment should have been made available during the consultation, as he considered residents to have not been properly informed of the likely effects of the Proposed Development.



Disruption to residents' economic activity

- 17.3.33 Fenland and West Norfolk Friends of the Earth said that the Proposed Development had caused distress among local residents.
- 17.3.34 Steve Barclay MP raised concerns that the Proposed Development would only create adverse impacts on the environment without providing significant local and national benefits.

Viability or displacement of businesses or commercial activity

- 17.3.35 Nordelph Parish Councils considered there to be no benefits to locating the Proposed Development in an area dominated by agriculture and agricultural land. It said that potential effects on local food production, including effects on local soils could result in the loss of agricultural accreditation and cause considerable harm to local farming.

17.4 How feedback has influenced the DCO application

- 17.4.1 As outlined above, a range of comments were received from consultees in relation to the socio-economic effects of the Proposed Development. A summary of how feedback has been taken into account in the preparation of the DCO application is provided below with details of the feedback received and the Applicant's response presented in tabular format in **Appendix JJ** (Table 10.1).

Assessment methodology and scope

- 17.4.2 As part of the Stage 2 Statutory Consultation the Applicant presented the preliminary findings of the socio-economic assessment in Chapter 15 of the PEIR. The Residential Visual Amenity Assessment was also published as Appendix 9F to PEIR Chapter 9 Landscape and Visual. In response to feedback received as well as ongoing engagement with Stakeholders the Applicant has reviewed its proposals and updated its assessments accordingly, these are presented in the ES **Chapter 9: Landscape and Visual (Volume 6.2)** that accompanies the DCO application.
- 17.4.3 The Applicant has amended its proposals and can confirm that there is no requirement to either temporarily or permanently close a public right of way for the Proposed Development. The proposed Grid Connection will cross under a section of the A47 verge which marks a break in the Halfpenny Lane PRow. Works will also be undertaken at night and reinstated by the next day. Improvements to the local footpath network could come forward as part of a community benefits package following engagement with the local community as set out in the **Outline Community Benefits Plan (Volume 7.14)**.
- 17.4.4 The Applicant can respond to the request from CCC regarding a 30% non-local workforce. The 70% local workforce referred to in the PEIR was based upon MNV's experience when constructing its Devonport facility. The Applicant has not set itself a target for the Proposed Development but will seek to maximise the number of local workers employed during construction (and operation) via mechanisms such as the **Outline Employment and Skills Strategy (Volume 7.8)**. Effects on air quality



arising from the construction of the Proposed Development are considered in ES **Chapter 8: Air Quality (Volume 6.2)** whilst effects on education provision are covered in **Chapter 15: Socio-Economics, Tourism, Recreation and Land Use (Volume 6.2)**.

Viability or displacement of businesses or commercial activity

- 17.4.5 The Applicant recognises the importance of being a good neighbour to the communities and businesses in the areas in which it operates. During the iterative design of the Proposed Development the Applicant remained committed to developing a range of job opportunities. ES **Chapter 3: Description of the Proposed Development (Volume 6.2)** identifies that the Proposed Development will create up to 40 new jobs when operational. It has committed to work with NCC and with other training providers, should they wish to engage, to support employment access locally and has prepared an **Outline Employment and Skills Strategy (Volume 7.8)**. The Outline Strategy includes commitments to work with local suppliers, support apprenticeships and internships for example.
- 17.4.6 The Applicant also recognises the importance of providing/hosting educational/inspiration events. As part of the DCO application it has provided an **Outline Community Benefits Strategy (Volume 7.14)** which sets out how it will support wider community initiatives. With regard to requests for planting, street cleaning and road repairs in local communities the Applicant does propose to plant trees at the EfW CHP Facility Site (**ES Figure 3.14: Outline Landscape and Ecology Strategy (Volume 6.3)**) and will improve the road surface along New Bridge Lane (**ES Figure 3.19: New Bridge Lane Access Improvements (Volume 6.3)**). A wider package of environmental enhancement measures could be provided as part of the **Outline Community Benefits Strategy (Volume 7.14)** which would be taken forward with the agreement of the local community. The Applicant is keen to work with Local Authorities, local educational establishments, and local community groups to refine the Community Benefits Strategy to ensure that the benefits provided are relevant to the local area in and around Wisbech.
- 17.4.7 With consideration of potential benefits to local businesses such as energy provision, ES **Chapter 3: Description of the Proposed Development (Volume 6.2)** confirms that the Proposed Development includes for the provision of a CHP Connection for the provision of heat (steam) and electricity to local businesses. ES **Chapter 3: Description of the Proposed Development (Volume 6.2)** also sets out that the Applicant is providing an opportunity for local businesses to take heat and electricity from the Proposed Development, reducing emissions and potentially providing commercially attractive power.
- 17.4.8 A Human Health Risk Assessment (ES **Chapter 8: Air Quality, Appendix 8B Annex G (Volume 6.4)**) has been prepared which considers the potential effects arising from the Proposed Development on humans, including through food grown locally. It concludes that that effects upon human health would be negligible. Dispersion modelling has also been carried out and identifies that pollutant concentrations and deposition levels are likely to be comparable to nearby agricultural areas. This is presented in ES **Chapter 8: Air Quality (Volume 6.2)**.



- 17.4.9 The route of the Grid Connection forming part of the Stage 2 Statutory Consultation included an area of land which is potentially required for residential development. Following a review of the required land, the Applicant does not now propose to undertake any works on land identified for residential development. ES **Chapter 3: Description of the Proposed Development (Volume 6.2)** explains the proposed route for the grid Connection whilst ES **Chapter 2: Alternatives (Volume 6.2)** describes the evolution of the Proposed Development including the Grid Connection.
- 17.4.10 With consideration of concerns raised by consultees about impacts on the local setting and its community, the Applicant can confirm that the Proposed Development is located primarily within a site originally allocated for waste uses and on an industrial estate. The effect of the Proposed Development on local schools, colleges, retail and tourism in Wisbech is assessed within the ES **Chapter 15: Socio economics, Tourism, Recreation and Land Use (Volume 6.2)**. This concludes that effects will not be significant. Further, ES **Chapter 9: Landscape and Visual (Volume 6.2)** has undertaken an assessment of the construction and operational effects of the Proposed Development on the townscape and landscape and has concluded they would not be significant. It does conclude that there will be some significant visual effects however.
- 17.4.11 With regard to concerns raised by consultees that the Proposed Development would compromise the local road infrastructure making commuting difficult, ES **Chapter 6: Traffic and Transport (Volume 6.2)** provides the findings of an assessment which concludes that local highway network can accommodate the Proposed Development without giving rise to congestion or to other traffic-related environmental effects. As such, the Applicant considers it unlikely that the Proposed Development will affect tourism and retail in this way. An **Outline CTMP** and an **Outline Operational Travel Plan (Appendices 6A and 6C, Volume 6.4)** in addition to an **Outline Operational Traffic Management Plan (Volume 7.15)** have been prepared to provide additional mitigation to prevent disturbance to local businesses and ensure that existing businesses are not inconvenienced by operational traffic.

Disruption to residents' economic activity

- 17.4.12 As part of the EIA the Applicant has undertaken an assessment of the likely effects of the Proposed Development on socio-economic Receptors. This is presented in ES **Chapter 15: Socio economics, Tourism, Recreation and Land Use (Volume 6.2)**. This Chapter provides information on the number of people that the Proposed Development will employ during its construction and operation such that it should support economic development in the area. It also considers the requirement for worker accommodation during construction and identifies the Applicant's **Outline Employment and Skills Strategy (Volume 7.8)** as a means of maximising the local workforce and hence minimising the requirement for workers from outside the Study Area. Approximately 700 workers are projected to be employed during construction and they will in turn generate indirect jobs, consequently local employment opportunities will be enhanced.



- 17.4.13 Some consultees raised the issue that compensation should be provided where property prices decrease or should any other financial losses be incurred as a result of the Proposed Development. The effect of the Proposed Development on house prices in the local area is not a matter for consideration when considering the merits or otherwise of an application. However, ES **Chapter 15: Socio economics, Tourism, Recreation and Land Use (Volume 6.2)** includes a review of the local housing market, how it is constituted and the average house price. House prices are driven by a range of factors, and it is considered generally that the Proposed Development would not by itself decrease house prices. For a limited number of properties that may be affected by physical factors (such as noise) during the operation of the Proposed Development, and such factors results in a diminution in value, a claim for compensation can be made under Part 1 of the Land Compensation Act 1973.
- 17.4.14 As part of the DCO application the Applicant has provided an **Outline Community Benefits Strategy (Volume 7.14)** which sets out how the Applicant will support wider community initiatives. The Applicant is keen to work with Local Authorities, local educational establishments, and local community groups to refine the **Outline Community Benefits Strategy (Volume 7.14)** to ensure that the community benefits provided are relevant to the local area in and around Wisbech.

Skills and training in or related to operational development.

- 17.4.15 The Applicant is committed to providing community benefits and has a track record in running educational activities at its existing facilities. This includes education and awareness, and STEM activities which would be offered at the proposed facility if the local communities or local educational establishments consider it to be beneficial.
- 17.4.16 Other community benefits from the Proposed Development will be in the form of jobs during construction and operation with local residents supported through an **Outline Employment and Skills Strategy (Volume 7.8)** which has been developed in consultation with NCC. This Strategy includes a commitment to apprenticeships, interns, and work experience. The Applicant will also employ a Community Liaison Manager whose role will include engaging with local schools and higher educational establishments. The Applicant has also prepared an **Outline Community Benefits Strategy (Volume 7.14)**.



18. Traffic and Transport

18.1 Introduction

18.1.1 As part of the Stage 2 Statutory Consultation, the Applicant sought feedback in relation to the design of the Proposed Development, its impacts and the mitigation measures proposed to reduce the impacts of the Proposed Development on the local environment and community.

18.1.2 This chapter provides a summary of the relevant traffic and transport consultation feedback received from prescribed consultees, local authorities, members of the public and wider Stakeholders grouped under the following headings:

- Assessment methodology and scope;
- Baseline conditions;
- Construction Traffic;
- Operational Traffic;
- Other road users; and,
- Rail transport.

18.1.3 Where comments have not been received under the headings above, these have been removed to reflect this. The issues raised by respondents have also been grouped in table form at **Appendix JJ** (Table 11.1), which includes the Applicant's response.

18.2 Section 42 Consultees

Local Authorities

Assessment methodology and scope

18.2.1 CCC requested a more detailed analysis of accidents involving vulnerable road users be included in the Transport Assessment as it considered that this analysis is not evident in the PEIR.

18.2.2 The Council questioned the calculations for traffic movements and the amount of available residual waste per annum. It said that smaller travel distances were used for assessing transport-related emissions in the 'without Proposed Development' scenario, but waste-related emissions in both scenarios were assessed using the same travel distance. It also shared concern about the identified catchment area for waste supply.

18.2.3 The Council considered that the Traffic and Transport Report did not provide sufficient detail on traffic impacts on link and junction capacity or highway safety. It



said that the assessment should consider comments made by the Council's Transport Assessment team as well as its Transport Assessment Requirements from 2019. It further suggested that the Transport Assessment should consider changes in traffic flow due to committed schemes and expected significant impacts on Peterborough's highway network.

18.2.4 The Council said that the data used in the PEIR, paragraph 6.4.10 and table 6.4 should be sourced from the Council. It also raised concerns about data from 2004 being used in paragraph 6.5.30 of the PEIR and requested that the source data used in paragraphs 6.6.145, 6.6.35 and 6.6.19 be included in the appendices of the Transport Assessment to enable validation of the results. It also requested that the source of the TEMPro figures be provided.

18.2.5 The Council requested that the PRow Officer be included in the programme of inspection and maintenance of PRow impacted by construction activities as set out in the PEIR Section 3.3 of the Traffic and Transport Appendices.

18.2.6 FDC said that a full Transport Assessment, Travel Plan and up-to-date traffic survey be conducted to understand the full impacts of the construction and operational phase. It said that the Transport Assessment should include a more detailed assessment of the effects on Cromwell Road and the entrance to New Bridge Lane. It requested that both New Bridge Lane and Algores Way access route options be assessed in more detail to understand the impacts fully, and that a detailed assessment be undertaken to clarify impacts of potential upgrades to New Bridge Lane and its suitability to accommodate the proposed traffic volumes.

18.2.7 KLWN said that the effect of additional HGV movements during construction and operation will require consideration and highlighted that a Traffic Assessment and Travel Plan will be required in the ES. The Council also raised concerns about the accuracy of information provided on the proposed modifications to the highway network and sought clarification on whether the traffic movement figures included members of staff at the proposed facility and the average one-way HGV distance.

18.2.8 NCC Highways said that a joint site survey will be required to identify and assess transport impacts from the Grid Connection on key sensitive Receptors such as School Road and West Walton.

Baseline conditions

18.2.9 CCC expressed support for the highway condition survey as they considered that it would provide Stakeholders with an understanding of the existing condition to be remedied ahead of construction and operation. It said that the highway condition surveys should be undertaken by independent consultants.

18.2.10 NCC Highways said that a pre-condition survey and a video survey of the highway conditions should be conducted for inclusion in the Construction Traffic Management Plan (CTMP).



Construction Traffic

- 18.2.11 CCC expressed concern about potential disruption to the local highway network from engineering, utilities and highway works during the construction phase. It also raised concern about the suitability of Halfpenny Lane to accommodate heavy construction traffic and public access due to its narrowness, surface and proximity to drains. It requested more detail on the intended use of the Halfpenny Lane byway for construction access. The Council suggested that the drainage board should be consulted on any proposals to strengthen it due to its proximity to water courses. It also said that mitigation and safety measures for Halfpenny Lane should accommodate all non-motorised users including walkers, cyclists, and horse-riders.
- 18.2.12 CCC suggested that the Applicant provide mitigation measures for additional traffic from construction workers and HGVs within the CTMP.
- 18.2.13 FDC raised concerns about the impact of increased traffic movements on New Bridge Lane, Elm High Road, Churchill Road, and the A47 during construction.
- 18.2.14 KLWN expressed similar concern about the effect of site construction traffic on residents along Elm High Road and Grid Connection construction traffic on residents.
- 18.2.15 NCC Highways suggested that early consultation be undertaken with affected properties to ensure traffic impacts from access routes are minimised and mitigated. Peterborough City Council raised concern about the adverse impacts on Peterborough's highway network as a result of the size, scale and location of the Proposed Development.

Operational Traffic

- 18.2.16 CCC expressed concern about the effect of additional HGV movements on road quality, congestion, and road safety. It considered that the measures proposed to mitigate the impact of HGV movements were insufficient. The Council suggested that active travel should be encouraged for full-time employees at the site.
- 18.2.17 FDC expressed concern about the increased traffic movements resulting from the Proposed Development on routes with existing high traffic volumes. It said that additional HGV movements would damage the existing roads in the local area.
- 18.2.18 FDC objected to the proposed site access from Algores Way. It said that direct connections with a major A road to the site should be provided. It also suggested that New Bridge Lane should be upgraded if it is selected as the preferred HGV access route due to concerns about the width of the highway and the closed level crossing.
- 18.2.19 KLWN said that the HGV movements transporting waste from Lincolnshire to the Proposed Development would frequently pass the Pullover roundabout. It advised that this roundabout is known to be the site of frequent road traffic incidents.



Other road users

- 18.2.20 CCC, Emneth, Nordelph and Walsoken Parish Councils, FDC, KLWN , NCC, and Wisbech Town Council raised concerns that the existing road infrastructure could not support the anticipated increase in HGV traffic. They said that the road network is already congested.
- 18.2.21 NCC expressed concern about the cumulative impact of increased HGV traffic and traffic from new housing developments on the A47/A1101 roundabout. It also said that increased traffic from the Proposed Development on the A47 would cause further impacts on local businesses.

Rail transport

- 18.2.22 CCC said that it and Cambridgeshire and Peterborough Combined Authority should be consulted on considerations for mass freight movements along the disused March to Wisbech Railway.
- 18.2.23 FDC said that the installation of the CHP infrastructure along the disused march to Wisbech Railway would prevent the potential re-opening of the line. It also raised concern about the safety challenges of working within and alongside current live rail infrastructure, particularly the nearby track bed.

Prescribed Consultees

Assessment methodology and scope

- 18.2.24 The EA suggested that access roads should be set according to 0.1% Annual Exceedance Probability to maintain access in the event of a flood breach.
- 18.2.25 Highways England said that it was satisfied with the construction and operational phases Study Areas as seen in Figures 6.1 and 6.2 in Chapter 6 of the PEIR. It said that the Transport Assessment should be completed at a suitable point after the lifting of COVID-19 restrictions. It said that it should be undertaken in accordance with the Department for Transport's 'Strategic Road Network and the Delivery of Sustainable Development' document and that it be informed by a Walking, Cycling and Horse Riding Assessment Report.
- 18.2.26 Highways England also suggested that the junction of the Strategic Road Network should be assessed based on the predicted flows in the construction and operational phases.
- 18.2.27 Royal Mail said that the PEIR and CEMP did not include provision for advance notification of major road users, like Royal Mail, of works, traffic, or events that may affect the highway network. It suggested that the CTMP include a mechanism for the Applicant to inform them of works affecting local highways, particularly with regards to access to their Wisbech Delivery Office.
- 18.2.28 Wisbech Town Council said that the PEIR NTS was unclear about whether the additional 362 HGV trips would be spread throughout the day or whether it would be a peak in HGV traffic. It also said that the NTS did not include information on the



likely magnitude of the effects on traffic and that the NTS required the reader to refer to the PEIR to understand the assessment of the construction phases for the four access scenarios are.

18.2.29 The Council considered that the conclusion reached in the PEIR NTS was determined without undertaking traffic surveys due to COVID-19 restrictions and that it was unclear what evidence supported the conclusions. It also said that the proposals were premature as the traffic and transport studies for the emerging local plan for the area were incomplete and as such local issues could not be fully understood.

18.2.30 The Council expressed concern that it was not possible to determine whether the information presented in Table 6.24 of the PEIR was correct based on that presented in Table 6.23 as no information was provided regarding congestion.

Baseline conditions

18.2.31 Wisbech Town Council raised concern that the PEIR NTS did not include baseline traffic information and considered that the likely impacts of the increased HGV traffic are therefore unclear.

Construction Traffic

18.2.32 National Grid said that construction traffic should only cross gas pipelines at previously agreed locations where existing roads cannot be used.

18.2.33 Royal Mail expressed support for proposals to produce a CTMP in advance of construction works and for it to be agreed with the relevant planning and highway authorities.

Operational Traffic

18.2.34 Highways England objected to the Proposed Development as they considered that the proposed site access from the A47 was contrary to policy set out in the Department for Transport's document 'The Strategic Road Network and the Delivery of Sustainable Development'.

18.2.35 HWIDB expressed concern that the increased traffic movements resulting from the Proposed Development would adversely impact local water levels and flood risk management systems.

18.2.36 Royal Mail raised concerns that the Proposed Development could result in the disruption of mail services to their Wisbech Delivery Office due to traffic impacts on surrounding roads.

18.2.37 Wisbech Town Council expressed concern that the information provided regarding primary access to the site was unclear about whether it consisted of direct access from the A47.



Other road users

- 18.2.38 Highways England raised concern about the impact on the A47 and the effect of an increase in traffic movements during operation on other road users.
- 18.2.39 Royal Mail raised concern that increased traffic on the local roads, such as A47 and those adjacent, may impact on its operations and ability to perform statutory duties and Universal Service Obligation.

Rail transport

- 18.2.40 The Department for Transport expressed concern that the Proposed Development would prevent the re-opening of the disused March to Wisbech Railway. Network Rail also raised similar concern.
- 18.2.41 Network Rail objected to the Proposed Development as they considered that they had not been formally consulted on it. They shared concern that the Proposed Development would compromise future transport opportunities within the area.
- 18.2.42 Wisbech Town Council expressed concern that the installation of the Grid Connection infrastructure along the March to Wisbech Railway would prevent the potential re-opening of the line.

Persons with an interest in land (PILs)

Assessment methodology and scope

- 18.2.43 A PIL said that improvements to New Bridge Lane would not help solve traffic and congestion issues. Another raised concern about the increased traffic causing air and noise pollution.

Operational Traffic

- 18.2.44 A PIL raised concerns about the increase of traffic on local roads such as the A47 and the effects on local communities.

Other road users

- 18.2.45 Some PILs expressed concern that the road infrastructure could not cope with the projected increase of HGV traffic resulting from the Proposed Development. They highlighted that the A47 is the only road in and out of Wisbech and is a single carriageway.
- 18.2.46 A PIL expressed concern that the increased HGV traffic movements arising from the Proposed Development would result in delays for traffic serving other local businesses.



18.3 Section 47 Consultees

Members of the public

Assessment methodology and scope

- 18.3.1 Some members of the public considered that as the Traffic Assessment was undertaken during the COVID-19 lockdown it did not consider a valid representation of traffic conditions. Others expressed concern that no Traffic Impact Assessment had been conducted.
- 18.3.2 Several members of the public raised concerns about increased traffic from the Proposed Development causing additional pollution and noise. A respondent also raised concern that increased HGV and traffic movements would cause an increased safety risk, particularly for children attending local schools. Additional comments requested information on whether the site entrance would impact the proposed Wisbech Gateway retail development and whether access to the facility should be moved to a backroad that is not currently closed.
- 18.3.3 Respondents raised concerns that the lorry access proposals would not be effective as they would move congestion issues elsewhere and would still require HGVs to use the already congested A47 and A17. Others questioned whether the proposals would be implemented prior to or during construction and expressed support for the lorry access proposals. Additional comments received suggested that no traffic should access the site from the A17 via the A1101 or any roads east of the A16.
- 18.3.4 Members of the public raised concern that the proposed improvements to local roads will not help solve existing congestion issues. Another said that the proposals appear to not understand the current road infrastructure. Some consultees raised concern that the Guyhirn roundabout cannot support increased traffic.
- 18.3.5 Some respondents suggested that the local road infrastructure should be replaced or upgraded to accommodate the Proposed Development, including suggestions that a dual carriageway be built, or existing roads upgraded. A further comment suggested that the Proposed Development should be located along an existing dual carriageway such as the A1.

Baseline conditions

- 18.3.6 Several respondents said that the existing road infrastructure in Wisbech cannot cope with current traffic levels and is not well maintained. Others requested information on the anticipated percentage increase in HGV traffic in the area.
- 18.3.7 A member of the public raised concern that the lorry access proposals would not prevent traffic accessing the Proposed Development from the North. Another respondent raised concern that existing traffic and infrastructure issues cannot be solved as Wisbech has a large number of single-lane main roads.
- 18.3.8 Comments were also received that highlighted a lack of public transport in the local area.



Operational Traffic

- 18.3.9 Several members of the public said that HGVs would need to reroute through unsuitable local roads during periods of congestion and road closures. Others commented that it was unclear how HGVs would access the site during periods of road maintenance and shared concern that this would exacerbate congestion.
- 18.3.10 Some respondents raised concern that the proposed operational routes are unsuitable, and that the Applicant cannot guarantee that HGVs drivers would comply with the agreed routes. Further comments requested information on HGVs, including whether they would be coming from the local area or further afield, whether they would be powered by electricity, and whether the waste being transported would be inspected.

Other road users

- 18.3.11 Members of the public frequently expressed concerns about an increase in traffic in the area and how it would affect daily life, including commuting times. They suggested that such an increase would cause local traffic to come to a standstill.
- 18.3.12 Concerns were also raised that the increase in traffic from the Proposed Development would delay emergency vehicles and health and social care workers, and that this could impact elderly and vulnerable residents. Others considered that the increased traffic would be even worse during holiday periods or suggested that the roads should be improved and widened to reduce disruption.

Rail transport

- 18.3.13 Many respondents said that the disused March to Wisbech Railway should be re-opened, while others raised concerns that the Proposed Development would prevent the railway from re-opening or that the Applicant had not sought to re-establish the railway. Some members of the public suggested that waste should be transported by rail freight.

Businesses and Community Groups

Assessment methodology and scope

- 18.3.14 Commercial Safety Systems Ltd, Engineering & Factory Suppliers Ltd, English Brothers Ltd, Icon Engineering Ltd, Kirk Coachworks, MJ Acoustics, Shampers Dog Grooming and The Sportsman Pub expressed concerns that the road infrastructure could not cope with increased HGV movements and the Proposed Development would cause traffic to come to a standstill.
- 18.3.15 Elm Road Primary School and Nene and Ramnoth School raised concern that PEIR does not give assurance that the times of 7:00 to 20:00 will be adhered to. They also raised concerns about the increased traffic movements on existing local roads which they considered to be dangerous such as A47, A1/A1M and A1101.



- 18.3.16 Engineering & Factory Suppliers Ltd, Icon Engineering Ltd and MJ Acoustics said that the existing road infrastructure is not well maintained and is subject to damage sinkholes.
- 18.3.17 Wisbech, March and District Trades Union Council considered that the suggested use of alternative routes was unrealistic as some could add more than two hours to the return journey. It shared further concern about the impact of additional HGV movements on the A17 and A47.

Baseline conditions

- 18.3.18 Commercial Safety Systems Ltd, Engineering & Factory Suppliers Ltd, Icon Engineering and MJ Acoustics said that the traffic assessment and surveys undertaken were insufficient and have been carried out during periods of low traffic flow.
- 18.3.19 Shampers Dog Grooming advised that the A47 is the only road in and out of Wisbech and is single carriageway.
- 18.3.20 WEP Fabrications Ltd raised concern about increased traffic from the Proposed Development causing additional pollution and noise.

Construction Traffic

- 18.3.21 Icon Engineering Ltd requested clarification on whether the Applicant would fund the road repairs and improvements required as a result of the increased traffic movements generated by the Proposed Development.

Operational Traffic

- 18.3.22 Engineering & Factory Suppliers Ltd, MJ Acoustics, and The Sportsman Pub expressed concern that HGVs would need to re-route through unsuitable local roads during periods of congestion and road closures.
- 18.3.23 Elm Road Primary School and Nene and Ramnoth School raised concerns that the increased traffic will cause additional pollution and noise. They also raised concerns about potential wear and tear of local roads, including from spillages from HGVs on route to the Proposed Development. Elm Road and Primary School Nene and Ramnoth School raised concern that the Applicant cannot guarantee that lorry drivers will use the agreed routes. They also raised further concern that the consultation materials did not provide information explaining what HGVs would do if they arrived earlier or later than their agreed arrival time.
- 18.3.24 WEP Fabrications Ltd said that the Applicant cannot guarantee that HGV drivers would comply with the agreed routes.
- 18.3.25 Wisbech, March and District Trades Union Council raised concerns about the number of HGVs that need to access the proposed site on a daily basis.



Other road users

- 18.3.26 Elm Road Primary School and Nene and Ramnoth School raised concern about the impact of projected daily HGV movements on the surrounding road network, which is currently experiencing congestion. They also raised concern about the impact the increased HGV activity and traffic would affect daily life.
- 18.3.27 Icon Engineering Ltd said that increased HGV and traffic movements arising from the Proposed Development will result in delays for traffic serving other local businesses.
- 18.3.28 Kirk Coachworks and WEP Fabrications Ltd expressed concern about the increase in traffic and how it will affect daily life.
- 18.3.29 WEP Fabrications Ltd also expressed concern that increased HGV and traffic movements would increase safety risk, particularly for children attending local schools.
- 18.3.30 Wisbech, March and District Trades Union Council raised concern about the impact of projected daily HGV movements on the surrounding road network, which is currently experiencing congestion. It also raised concern about the impact the increased HGV activity and traffic would affect daily life.

Rail transport

- 18.3.31 Elm Road Primary School and Nene and Ramnoth School raised concern that the Proposed Development will prevent the disused March to Wisbech Railway from being re-established.
- 18.3.32 Wisbech, March and District Trades Union Council raised concern that the Proposed Development will prevent the disused March to Wisbech Railway from being re-established.

Wider Stakeholders

Assessment methodology and scope

- 18.3.33 Steve Barclay MP disputed the claim that only waste originating from within 2 hours of the Proposed Development would be processed there. He raised concern that the 2-hour travel metric had not been consistently applied to the major town centres of nearby local planning authorities. He also shared the view that the proposed EfW CHP Facility should not process waste originating from areas 160 miles away and said that waste should be treated locally.
- 18.3.34 Steve Barclay MP raised concern that the HGV traffic distribution data is inaccurate or unreliable due to the flawed assumptions of the DWFAA.

Baseline conditions

- 18.3.35 Steve Barclay MP identified that the condition of the highway is acknowledged within the documentation provided by the Applicant but had not been addressed. He



requested that a rigorous assessment of traffic impacts should be provided in the PEIR.

Operational Traffic

18.3.36 Fenland and West Norfolk Friends of the Earth raised concerns about potential wear and tear of local roads, including from spillages from HGVs on route to the Proposed Development. It also raised concerns that the increased traffic will cause additional pollution and noise.

Other road users

18.3.37 Fenland and West Norfolk Friends of the Earth raised concern about the impact of projected daily HGV movements on the surrounding road network, which is currently experiencing congestion.

18.3.38 Liz Truss MP expressed concern about the increase in HGV traffic movements as she considered that the existing road infrastructure could not cope with additional movements.

18.4 How feedback has influenced the DCO application

18.4.1 As outlined above, a range of comments were received from consultees in relation to traffic and transport during the construction and operation of the Proposed Development. A summary of how feedback has been taken into account in the preparation of the DCO application is provided below with full details of the feedback received and the Applicant's response presented in tabular format in **Appendix JJ** (Table 11.1).

Assessment methodology and scope;

18.4.2 As part of the Stage 2 Statutory Consultation the Applicant presented the preliminary findings of the Traffic and Transport assessment in Chapter 6 of the PEIR. In response to feedback received as well as ongoing engagement with Stakeholders, the Applicant has reviewed its proposals and updated its assessments accordingly. This includes updating the baseline data to take account of additional traffic surveys as well as, undertaking an assessment of the Strategic Road Network as agreed with National Highways for both construction and operational phases.

18.4.3 During the Stage 2 Statutory Consultation, responses were received requesting that New Bridge Lane and Algores Way access route options be further assessed. In response to this the Applicant looked carefully at access options for the Proposed Development. It has chosen New Bridge Lane as the access route for HGVs during the operational phase of the Proposed Development and this has been assessed within the Transport Assessment. The assessment concludes that the site can be accessed satisfactorily and without undue significant negative effects upon pedestrians taking into account widening of a footpath and the provision of new pedestrian crossings on New Bridge Lane. The road level will be maintained and a drainage design provided to be agreed with CCC prior to construction phase



commencing. ES **Appendix 6A: CTMP (Volume 6.4)** includes restrictions on the movements of HGVs during construction and operation. The Applicant considers that these restrictions will likely form a requirement of the DCO and that no HGVs will access the site from the A1101, the A17 or routes east of the A16.

- 18.4.4 Comments were received from consultees which said that the Applicant did not appear to understand the existing road infrastructure and raised concerns about the Guyhirn Roundabout not having capacity beyond existing traffic levels. The Applicant can confirm that the Transport Assessment and the updated EIA Traffic and Transport Assessment provide daily and peak hourly assessments including detailed link and junction assessment (including for the Guyhirn roundabout) for both the operational and construction period. These assessments conclude that the Proposed Development can be accommodated on the local highway network including the A47.
- 18.4.5 Further comments received during the Stage 2 Statutory Consultation, requested an assessment of the transport impacts from the Grid Connection on key sensitive Receptors such as School Road and West Walton. Following the Stage 2 Statutory Consultation, the Applicant has selected a fully underground connection to Walsoken as the chosen point of connection. This means that construction traffic will not be required to route to Walpole and West Walton.
- 18.4.6 Comments were also received from consultees during the Stage 2 Statutory Consultation which said that the existing road infrastructure is not well maintained and is subject to damage. The Applicant can confirm it is committed to undertaking condition surveys of all local roads used for construction. ES **Appendix 6A: CTMP (Volume 6.4)** sets out that any damage caused during construction of the Proposed Development will be repaired and returned to the previous condition.
- 18.4.7 Comments were received from consultees requesting that PRow Officers should be included in the programme of inspection and maintenance of PRow impacted by construction. Since the Stage 2 Statutory Consultation the Applicant has made changes to the Proposed Development and as such no PRow's will be directly affected.
- 18.4.8 The Applicant recognises that consultees requested more detailed analysis of accidents involving vulnerable road users. As part of the EIA submitted with the Application, the Applicant has undertaken an analysis of accidents. The findings are presented in ES **Chapter 6: Traffic and Transport (Volume 6.2)**. The requirement for advance notification to Royal Mail of works, traffic or events that may affect the local road network has been included within ES **Appendix 6A: CTMP (Volume 6.4)**.

Baseline conditions;

- 18.4.9 The Applicant notes that comments were received during the Stage 2 Statutory Consultation regarding the lack of baseline data within the PEIR. As agreed with the relevant local highway authorities no traffic surveys were undertaken to inform the PEIR due to low traffic levels as a result of the COVID-19 pandemic. As such this information was not available during the Stage 2 Statutory Consultation. Surveys were subsequently undertaken in October 2021 and the information, including the



potential for congestion are reported within the Transport Assessment which accompanies the DCO Application. Updated baseline data is included in ES **Chapter 6: Traffic and Transport (Volume 6.2)**.

- 18.4.10 Comments received from consultees that the existing road infrastructure cannot cope with current traffic levels, including the A47. Following the Stage 2 Statutory Consultation the Applicant has undertaken a detailed Transport Assessment and updated the EIA assessment to support the Application. Between these documents, daily and peak hourly assessments are provided. These assessments consider the A47 as a key access route to the site and conclude that it would not be significantly affected. The Proposed Development also includes improvements to New Bridge Lane. With these improvement measures in place the assessments conclude that there will be no significant residual effects resulting from the increase in HGV traffic.
- 18.4.11 Comments were also received which indicated that the existing road network is not well maintained. The Applicant can confirm that following the agreement of the scope with the relevant highways authorities, a pre-construction survey of the local roads will be undertaken and included within ES **Appendix 6A: CTMP (Volume 6.4)**. The CTMP includes restrictions on the movements of HGVs during the construction and operational phase to minimise impacts on Wisbech town centre. The Applicant considers that the route restrictions will likely form a requirement of the DCO.
- 18.4.12 In response to comments received during the Stage 2 Statutory Consultation with regard to effects on public transport, the Applicant can confirm that the EIA Traffic and Transport Assessment submitted with the Application identifies the availability of public transport in the local area, which includes for bus routes which would be within walking distance of the Proposed Development.

Construction Traffic;

- 18.4.13 The Applicant recognises that local residents expressed concerns over increased traffic movements and the impact of engineering, utilities and highways works during construction. The DCO application is supported by a detailed Transport Assessment, in addition to an updated EIA Traffic and Transport Assessment. The findings of these assessments are presented in ES **Chapter 6: Traffic and Transport (Volume 6.2)** and include the daily and peak hourly assessments and junction assessment for both the operational and construction period as appropriate. The assessments concluded that the Proposed Development can be accommodated on the local highway network including the routes referenced.
- 18.4.14 As a result of the Applicants decision for the Grid Connection to be underground within the verge of the A47, Halfpenny Lane will no longer be used by construction vehicles. Where requests were by consultees during the Stage 2 Statutory Consultation for construction traffic only to cross gas pipelines at agreed locations the Applicant can confirm that the DCO will include protective provisions to be agreed with the pipeline operator to ensure that the network is protected. In respect of the works to the local highways network, the Applicant can confirm that it will undertake the works in consultation with the relevant highway authorities in order to minimise disruption.



Operational Traffic;

- 18.4.15 The Applicant understands that local residents are concerned about the increased traffic movements from HGVs during operation of the proposed Development. The DCO application is supported by a detailed Transport Assessment, in addition to an updated EIA Traffic and Transport Assessment. The findings of these assessments are presented in ES **Chapter 6: Traffic and Transport (Volume 6.2)** and include the daily and peak hourly assessments and junction assessment for the operational period. The assessments conclude that the Proposed Development can be accommodated on the local highway network. The Applicant has also updated ES **Appendix 6A: CTMP (Volume 6.4)** and has also prepared a Travel Plan which includes mitigation measures.
- 18.4.16 ES **Appendix 6A: CTMP (Volume 6.4)**, which is submitted as part of the DCO Application, includes restrictions on the movements of HGVs to minimise impacts on Wisbech town centre. Whilst the Applicant recognises that there is potential for HGVs to reroute during periods of congestion or road closures, it cannot control the operation of the local and strategic highways network during such periods and operational traffic would be required to follow diversions installed. The Transport Assessment as provided as part of the DCO, sets out the proposed traffic generation and this does not indicate any additional congestions issues as a result of the development

Other road users;

- 18.4.17 The Applicant recognises that consultees have expressed concern that an increase in traffic movements during the operational phase will affect other road users, including emergency vehicles, health and social care workers, local businesses and pedestrians including school children. The DCO application is supported by a detailed Transport Assessment, in addition to an updated EIA Traffic and Transport Assessment. The findings of these assessments are presented in ES **Chapter 6: Traffic and Transport (Volume 6.2)** and include the daily and peak hourly assessments and junction assessment. The assessments conclude that the Proposed Development can be accommodated on the local highway network and that it would not affect local businesses. The updated Traffic and Transport Assessment also considers the impacts upon all users of local roads, footpaths and cycleways and concludes that there would be no residual significant effects.

Rail transport

- 18.4.18 Concerns were raised by consultees during the Stage 2 Statutory Consultation that the Proposed Development would compromise future transport opportunities within the area, particularly the re-opening of the disused March to Wisbech Railway. The Applicant considers, following engagement with Stakeholders, that its proposals (including the CHP Connection) will not prevent the reopening of the railway. The Applicant is fully supportive of proposals to reopen the disused March to Wisbech Railway. As part of the DCO application, land has been set aside to accommodate future railway bridge abutment and also a road bridge embankment should this be necessary in the future.



19. Conclusion

- 19.1.1 This Consultation Report has been produced pursuant to Section 37(3)(c) of the Planning Act 2008 which requires that an application for a DCO must be accompanied by a Consultation Report.
- 19.1.2 Through this report the Applicant has described and provided evidence of how compliance has met the provisions of the Planning Act 2008, the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 (APFP Regulations) and the Infrastructure Planning (Environmental Impact Assessment) (EIA) Regulations 2017 (the EIA Regulations) as they relate to pre-application consultation.
- 19.1.3 This report demonstrates how the Applicant has undertaken three main stages of pre-application consultation. This comprised two stages of non-statutory consultation, followed by a statutory consultation on the Applicant's proposed application. Outside of these consultation stages, ongoing engagement activities also took place and contributed to the evolution of the Proposed Development. This included engagement with Host Authorities at each stage of the process.
- 19.1.4 This report also demonstrates how the Applicant has responded and adapted positively to an unprecedented pandemic. Due to the COVID-19 pandemic and the associated social restrictions, the public exhibitions proposed as part of the Stage 1 Consultation were postponed. The Applicant committed to rearranging them as soon as possible and subsequently proposed an additional stage of non-statutory consultation prior to the Stage 2 Statutory Consultation (the Stage 1b Consultation – see below). The consultation remained live, and consultees were directed to the project website, email address or community contact point should they have any queries about the consultation or the Proposed Development.
- 19.1.5 A total of 706 pieces of feedback were received in response to the Stage 2 Statutory Consultation. Representations were received from local authorities, national and regional organisations, persons with an interest in land, and the local community. This document demonstrated how all representations were reviewed and analysed. Topic chapters in the report summarised the consultation feedback received from prescribed consultees, local authorities, members of the public and wider Stakeholders. A summary of how feedback has been taken into account was also provided.

