Medworth Energy from Waste
Combined Heat and Power Facility

PINS ref. EN010110
Document Reference: Vol 6.4
Revision 1.0
June 2022

Environmental Statement Chapter 1 Introduction. Appendix 1A List of Competent Experts

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

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Appendix 1A
List of Competent Experts

1.1.1 Competent experts involved in the preparation of the Environmental Statement are listed in the table below. The second column of this table includes two categories of staff, with different levels of responsibility:

- Technical reviewer: responsible for ensuring that the chapter is technically sound following currently accepted and agreed methodologies where appropriate and;
- Main author: the individual with the responsibility for drafting the report and co-ordinating any supporting tasks, the results of which are used to inform the assessments and conclusions presented in the chapter.

Chapter	Responsibility	Qualifications / competencies
1. Introduction	a. Technical reviewer	BA (Hons) Town and Country Planning, MA (Arch Hist), RTPI IHBC over 30 years' experience in land-use planning, EIA, socio-ec, sustainability and strategic environmental assessments.
	b. Main Author	BA (Hons) Geography, MSc (Spatial Planning), MRPTI - Over 15 years' experience in land-use planning and EIA.
2. Alternatives	a. Technical reviewer	BA (Hons) Town and Country Planning, MA (Arch Hist), RTPI IHBC over 30 years' experience in land-use planning, EIA, socio-ec, sustainability and strategic environmental assessments.
	b. Main Author	BA (Hons) Geography, MSc (Spatial Planning), MRPTI - Over 15 years' experience in land-use planning and EIA.
3. Description of the Proposed Development	a. Technical reviewer	BA (Hons) Town and Country Planning, MA (Arch Hist), RTPI IHBC over 30 years' experience in land-use planning, EIA, socio-ec, sustainability and strategic environmental assessments.
	b. Main Author	BA (Hons) Geography, MSc (Spatial Planning), MRPTI - Over 15 years' experience in land-use planning and EIA.

Chapter	Responsibility	Qualifications / competencies
4. Approach to the EIA	a. Technical reviewer	BA (Hons) Town and Country Planning, MA (Arch Hist), RTPI IHBC over 30 years' experience in land-use planning, EIA, socio-ec, sustainability and strategic environmental assessments.
	b. Main author	BA Hons DipTP Town Planning, MRPTI, PIEMA. Over 10 years' experience in land-use planning and EIA.
5. Legislative and Policy Overview	a. Technical reviewer	BA (Hons) Town and Country Planning, MA (Arch Hist), RTPI IHBC over 30 years' experience in land-use planning, EIA, socio-ec, sustainability and strategic environmental assessments.
	b. Main Author	BA (Hons) Geography, MSc (Spatial Planning), MRPTI - Over 15 years' experience in land-use planning and EIA.
6. Traffic and Transport	a. Technical reviewer	BA (Hons), Dip TP, MSc, MRTPI – over 25 years' experience in transport planning including EIA.
	b. Main author	BA Hons Geography and Planning – Over 15 years' experience in Transport Planning and major infrastructure projects.
7. Noise and Vibration	a. Technical reviewer	MSc Environmental Diagnostics, BSc (Hons) Chemistry, MIOA, IOA Dip, 19 years' experience.
	b. Main author	BSc (Hons), MIOA, 10 years' experience
8. Air Quality	a. Technical reviewer	BSc (Hons) Biology, 2004; MSc Environmental Diagnosis, 2006, Member, Institution of Environmental Science Member, Institution of Air Quality Management, - 15 years' experience in Air Quality Assessments.
	b. Technical reviewer, modelling	MEng, Marine Science and Engineering,1992; MSc Diploma, Physical Oceanography, Meteorology and Environment, 2003; PhD, Physical Oceanography, 1998 Member, Institution of Environmental Science, Member, Institution of Air Quality Management - 20 years' experience in Air Quality Management.
	b. Main author	MEng, Marine Science and Engineering,1992; MSc Diploma, Physical Oceanography, Meteorology and Environment, 2003; PhD, Physical Oceanography, 1998 Member, Institution of Environmental Science,

Chapter	Responsibility	Qualifications / competencies
		Member, Institution of Air Quality Management - 20 years' experience in Air Quality Management.
	c. Main Author	BSc (Hons), Biological Sciences, 2001; MSc, Environmental Diagnosis, 2003; PhD, Local Air Quality Management and Environmental Justice, 2007 Chartered Environmentalist, 2013 Member, Institution of Environmental Science, 2009 Member, Institution of Air Quality Management, 2009 - 13 years' experience in Air Quality Management.
9. Landscape and Visual	a. Technical reviewer	BSc (Dual Hons), Dip.LA, CMLI - Over 20 years' experience in LVIA.
	b. Main author	BA(Hons), M.LD, CLMI – Over 30 years' experience in LVIA.
	c. Main author	BA(Hons), Dip.LA, CLMI – Over 20 years' experience in LVIA.
10. Historic Environment	a. Technical reviewer	BA (Hons) MCIfA 30 years of experience working in the UK historic environment sector including EIA.
	b. Main author	BA MA PCIfA 7 years of experience in archaeological fieldwork and historic environment consultancy including EIA.
11. Biodiversity	a. Technical reviewer	BSc (Hons), MSc, MCIEEM, Chartered Environmentalist. Over 13 years of experience in ecological consultancy including Ecological Impact Assessment and Habitats Regulations Assessment, preceded by 8 years of regulatory experience with the Environment Agency as a statutory consultee for planning applications and Agency consents and reviewed Environmental Statements from a wide variety of sectors.
	b. Main author	BSc (Hons), MSc, MCIEEM. Over 14 years of experience in ecological consultancy and wildlife conservation, including collection and interpretation baseline data to inform assessment, and Ecological Impact Assessment.
12. Hydrology	a. Technical reviewer	Hydrology Chapter BSc (Hons) Geology, MSc Engineering Geology, PhD Hydrogeology, C. Geol. Over 25 years' experience in consulting on water resources and water quality.

Chapter	Responsibility	Qualifications / competencies
		Technical reviewer for a wide range of EIA projects. Flood Risk Assessment– BSc (Hons) Meteorology and Physical Oceanography. 17 years' experience in flood risk assessment, sustainable drainage and hydrology.
	b. Main author	Meng Environmental Engineering, MSc Environmental Technology, PhD Groundwater risk assessment, Member CIWM Over 17 years' experience in EIA including hydrology, hydrogeology and flood risk.
13. Geology, Hydrogeology and Contaminated Land	a. Technical reviewer	BSc, Plant Sciences, MSc Environmental Rehabilitation, Member of the Institute of Environmental Management and Assessment. Over 25 years' experience in geology, hydrogeology and contaminated land. An IEMA Registered Environmental Auditor.
	b. Main author	MEnvS Environmental Studies, Member of the Institute of Environmental Management and Assessment. Over 15 years' experience in geology, hydrogeology and contaminated land.
14. Climate	a. Technical reviewer	MSc Environmental Diagnostics, BSc Biology. Full member of Institute of Air Quality Management. Full member of the Institution of Environmental Sciences. Over 15 years of experience in air quality consultancy.
	b. Main author	MSc Risk, BSc Geography. Practitioner member of the Institute of Environmental Management and Assessment (PIEMA). Over 3 years of experience in EIA.
15. Socio-economics	a. Technical reviewer	BA (Hons) Town and Country Planning, MA (Arch Hist), RTPI IHBC over 30 years' experience in land-use planning, EIA, socio-ec, sustainability and strategic environmental assessments.
	b. Main author	BA (Hons) Town Planning, RTPI, over 25 years' experience in land-use planning, EIA, socio-economics and health, Integrated Impact Assessment (including health impact assessment, equality impact assessment, sustainability and strategic environmental assessments.

Chapter	Responsibility	Qualifications / competencies
16. Health	a. Technical reviewer	BA (Hons) Town and Country Planning, MA (Arch Hist), RTPI IHBC over 30 years' experience in land-use planning, EIA, socio-ec, sustainability and strategic environmental assessments.
	b. Main author	BA (Hons) Town Planning, RTPI, over 25 years' experience in land-use planning, EIA, socio-economics and health, Integrated Impact Assessment (including health impact assessment, equality impact assessment, sustainability and strategic environmental assessments.
17. Major Accidents and Disasters	a. Technical reviewer	Over 25 years' experience of Major Accidents Risk Assessment BSc (Hons) in Chemistry Chartered Chemist and Member of the Royal Society of Chemistry.
	b. Main author	8 years' experience in Major Accident Risk Assessment MChem BSc (Hons) in Chemistry Chartered Environmentalist, Chartered Chemist and Member of the Royal Society of Chemistry.
18. Cumulative Effects Assessment	a. Technical reviewer	BA (Hons) Town and Country Planning, MA (Arch Hist), RTPI IHBC over 30 years' experience in land-use planning, EIA, socio-ec, sustainability and strategic environmental assessments.
	b. Main author	BA Hons Geography, MSc City and Regional Planning, PhD Town and Country Planning MRPTI. Over 22 years' experience in land-use planning and policy evaluation.

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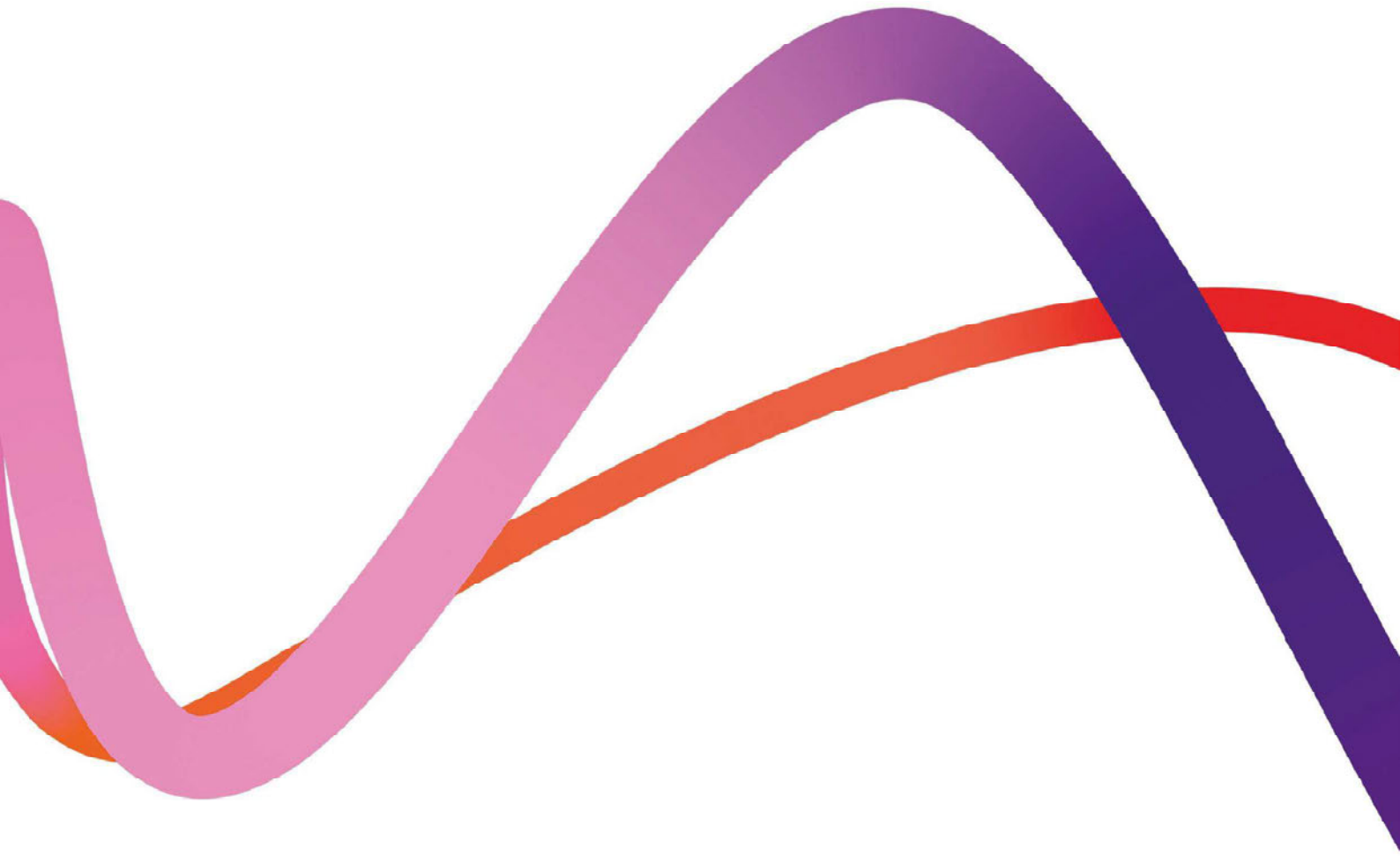

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Environmental Statement Chapter 1 Introduction: Appendix 1B Applicant's Confirmation of Competent Experts

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

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Appendix 1B Applicant's Confirmation of Technical Experts

Please reply to
c/o Devonport EfW CHP Facility, Creek Road, Plymouth, PL5 1FL

To whom it may concern

Medworth CHP Limited
Registered Office:
Devonport EfW CHP Facility
Creek Road
Plymouth
PL5 1FL

[redacted]

Tim Marks
[redacted]

Managing Directors:
Paul Carey
Peter Knapp
M ke Turner

Registration Number:
13130012

24th June 2022

Dear Sirs

PROPOSED MEDWORTH ENERGY FROM WASTE COMBINED HEAT AND POWER FACILITY

We confirm competent experts were employed to produce and review the Environmental Statement.

Yours faithfully

[redacted]

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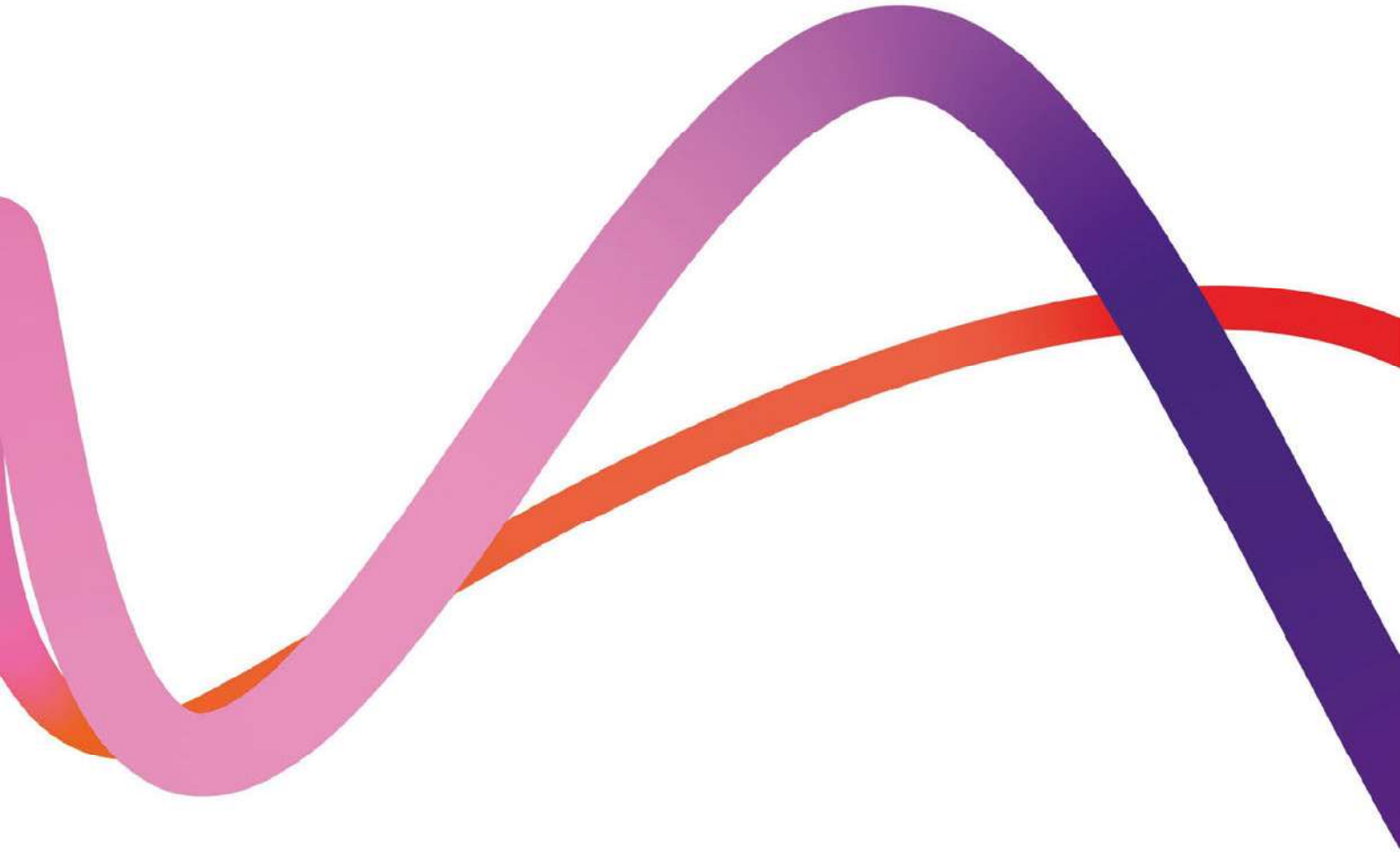

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Environmental Statement Chapter 1 Introduction. Appendix 1C Regulation 8(1) (B) Notice

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

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Appendix 1B Regulation 8(1) (B) Notice

Please reply to:
c/o Devonport EfW CHP Facility, Creek Road, Plymouth, PL5 1FL

Ms Sully
The Planning Inspectorate
Temple Quay House
2 The Square
Bristol
BS1 6PN

MVV Environment Limited
Registered Office:
1 Wood Street
London
EC2V 7WS

[redacted]

Paul Carey
[redacted]

Managing Directors:
Paul Carey
Mike Turner
Uwe Zickert

Registration Number:
6709860

By email to Medworth@planninginspectorate.gov.uk

3rd December 2019

Dear Ms Sully

The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (as amended) Regulation 8(1)(b) Notification of Environmental Statement Regulation 10(1) Application for a scoping opinion

We, MVV Environment Limited (the Applicant) write concerning our proposals for the Medworth Energy from Waste Combined Heat and Power Facility (the proposed development), for which we intend to apply for development consent under the Planning Act 2008.

The generating station would have a gross capacity of up to 58.1MWe and would provide the opportunity to deliver heat and power to neighbouring businesses. The proposed development may also include other infrastructure, such as a grid connection and local access improvements.

In accordance with Regulation 8(1)(b) of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2018 (EIA Regulations), we write to notify you that we propose to provide an environmental statement in respect of the development.

We also apply for a scoping opinion as to the scope and level of detail of the information to be provided in the environmental statement, under Regulation 10(1) of the EIA Regulations. An electronic copy and two paper copies of the Scoping Report has been provided with this letter.

For your duties under Regulation 11(1)(a) of the EIA Regulations, we confirm that MVV Environment Ltd is the Applicant for the proposed development and our address is; MVV Environment Ltd, c/o Devonport EfW CHP Facility, Creek Road, Plymouth, Devon, PL5 1FL.

Should you require any further information or have any queries regarding the attached Scoping Report, please contact our agent, Hannah Nelson at Wood Environment and Infrastructure Solutions UK Ltd; Tel: [redacted]

Yours sincerely

[redacted]

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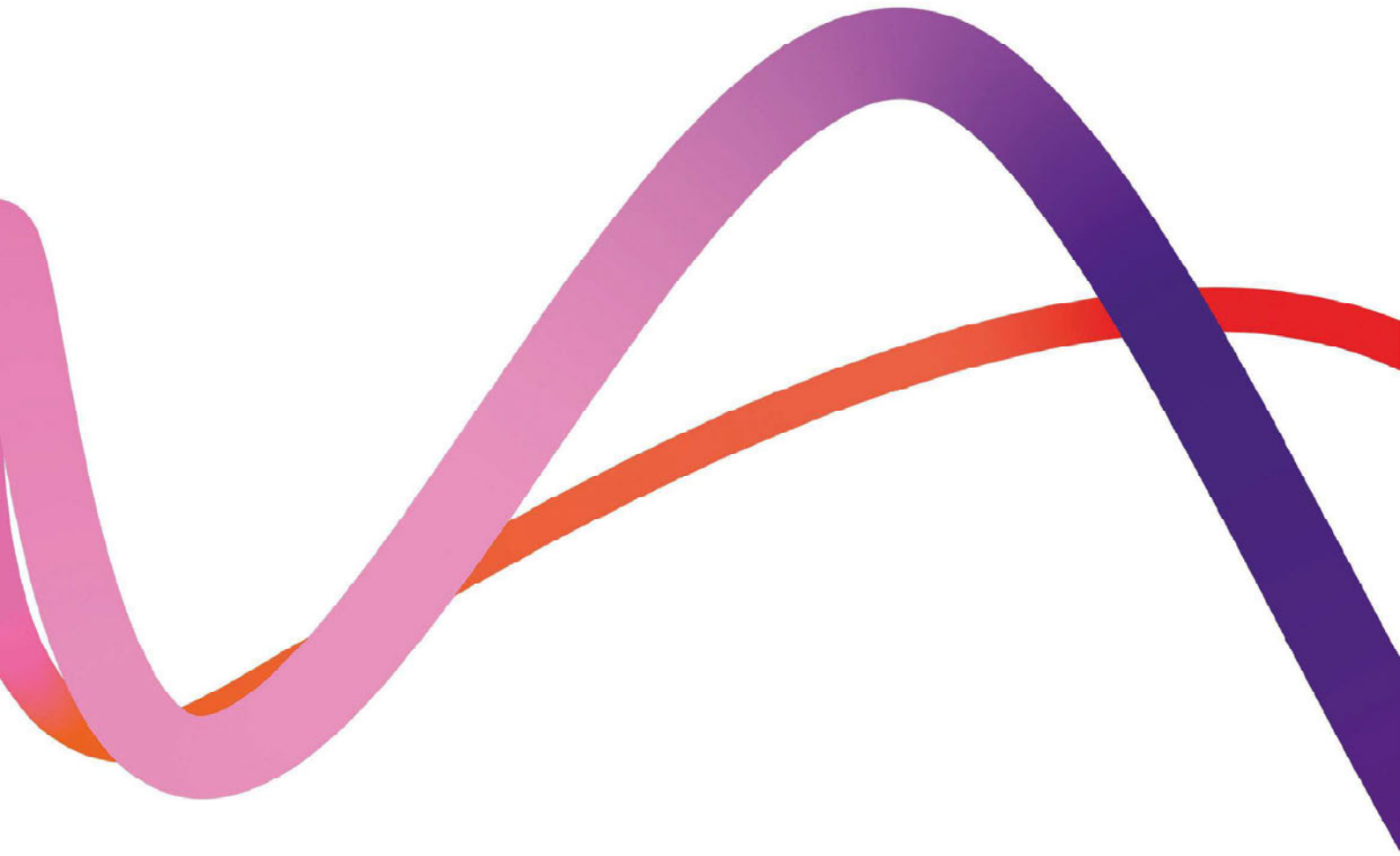

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Environmental Statement Chapter 1 Introduction Appendix 1D EIA Scoping Opinion

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

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The Planning Inspectorate
Yr Arolygiaeth Gynllunio

SCOPING OPINION:

Proposed Medworth Energy from Waste Combined Heat and Power Facility

Case Reference: EN010110

Adopted by the Planning Inspectorate (on behalf of the Secretary of State) pursuant to Regulation 10 of The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017

January 2020

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CONTENTS

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1. INTRODUCTION

1. Background

1.0.1 On 04 December 2019, the Planning Inspectorate (the Inspectorate) on behalf of the Secretary of State (SoS) received a scoping request from MVV Environment Ltd (the Applicant) under Regulation 10 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) for the proposed Medworth Energy from Waste Combined Heat and Power Facility (the Proposed Development).

1.0.2 In accordance with Regulation 10 of the EIA Regulations, an Applicant may ask the SoS to state in writing its opinion *'as to the scope, and level of detail, of the information to be provided in the environmental statement'.*

1.0.3 This document is the Scoping Opinion (the Opinion) provided by the Inspectorate on behalf of the SoS in respect of the Proposed Development. It is made on the basis of the information provided in the Applicant's report entitled Medworth Energy from Waste Combined Heat and Power Facility EIA Scoping Report (the Scoping Report). This Opinion can only reflect the proposals as currently described by the Applicant. The Scoping Opinion should be read in conjunction with the Applicant's Scoping Report.

1.0.4 The Applicant has notified the SoS under Regulation 8(1)(b) of the EIA Regulations that they propose to provide an Environmental Statement (ES) in respect of the Proposed Development. Therefore, in accordance with Regulation 6(2)(a) of the EIA Regulations, the Proposed Development is EIA development.

1.0.5 Regulation 10(9) of the EIA Regulations requires that before adopting a scoping opinion the Inspectorate must take into account:

(a) any information provided about the proposed development;

(b) the specific characteristics of the development;

(c) the likely significant effects of the development on the environment; and

(d) in the case of a subsequent application, the environmental statement submitted with the original application.

1.0.6 This Opinion has taken into account the requirements of the EIA Regulations as well as current best practice towards preparation of an ES.

1.0.7 The Inspectorate has consulted on the Applicant's Scoping Report and the responses received from the consultation bodies have been taken into account in adopting this Opinion (see Appendix 2).

1.0.8 The points addressed by the Applicant in the Scoping Report have been carefully considered and use has been made of professional judgement and experience in order to adopt this Opinion. It should be noted that when it comes to consider the ES, the Inspectorate will take account of relevant legislation and guidelines. The Inspectorate will not be precluded from

requiring additional information if it is considered necessary in connection with the ES submitted with the application for a Development Consent Order (DCO).

1.0.9 This Opinion should not be construed as implying that the Inspectorate agrees with the information or comments provided by the Applicant in their request for an opinion from the Inspectorate. In particular, comments from the Inspectorate in this Opinion are without prejudice to any later decisions taken (eg on submission of the application) that any development identified by the Applicant is necessarily to be treated as part of a Nationally Significant Infrastructure Project (NSIP) or Associated Development or development that does not require development consent.

1.0.10 Regulation 10(3) of the EIA Regulations states that a request for a scoping opinion must include:

(a) a plan sufficient to identify the land;

(b) a description of the proposed development, including its location and technical capacity;

(c) an explanation of the likely significant effects of the development on the environment; and

(d) such other information or representations as the person making the request may wish to provide or make.

1.0.11 The Inspectorate considers that this has been provided in the Applicant's Scoping Report. The Inspectorate is satisfied that the Scoping Report encompasses the relevant aspects identified in the EIA Regulations.

1.0.12 In accordance with Regulation 14(3)(a), where a scoping opinion has been issued in accordance with Regulation 10 an ES accompanying an application for an order granting development consent should be based on '*the most recent scoping opinion adopted (so far as the proposed development remains materially the same as the proposed development which was subject to that opinion)*'.

1.0.13 The Inspectorate notes the potential need to carry out an assessment under The Conservation of Habitats and Species Regulations 2017 (the Habitats Regulations). This assessment must be co-ordinated with the EIA in accordance with Regulation 26 of the EIA Regulations. The Applicant's ES should therefore be co-ordinated with any assessment made under the Habitats Regulations.

1.1 The Planning Inspectorate's Consultation

1.1.1 In accordance with Regulation 10(6) of the EIA Regulations the Inspectorate has consulted the consultation bodies before adopting a scoping opinion. A list of the consultation bodies formally consulted by the Inspectorate is provided at Appendix 1. The consultation bodies have been notified under Regulation 11(1)(a) of the duty imposed on them by Regulation 11(3) of the EIA Regulations to make information available to the Applicant relevant to the

preparation of the ES. The Applicant should note that whilst the list can inform their consultation, it should not be relied upon for that purpose.

1.1.2 The list of respondents who replied within the statutory timeframe and whose comments have been taken into account in the preparation of this Opinion is provided, along with copies of their comments, at Appendix 2, to which the Applicant should refer in preparing their ES.

1.1.3 The ES submitted by the Applicant should demonstrate consideration of the points raised by the consultation bodies. It is recommended that a table is provided in the ES summarising the scoping responses from the consultation bodies and how they are, or are not, addressed in the ES.

1.1.4 Any consultation responses received after the statutory deadline for receipt of comments will not be taken into account within this Opinion. Late responses will be forwarded to the Applicant and will be made available on the Inspectorate's website. The Applicant should also give due consideration to those comments in preparing their ES.

1.2 Article 50 of the Treaty on European Union

1.2.1 On 26 June 2018 The European Union (Withdrawal) Act 2018 received Royal Assent and the UK is expected to leave the European Union on 31st January 2020. The European Union (Withdrawal) Act 2018 provides that UK laws continue to operate following the UK's exit during the implementation period which is currently to 31st December 2020 save for some specific provisions. There is no immediate change to legislation or policy affecting national infrastructure. Relevant EU Directives have been transposed into UK law and those are unchanged until amended by Parliament.

1.2.2 The Inspectorate advises that Applicants make effort to ensure that relevant consultation documents provide a clear description of the applicable legal position and any known changes likely to arise as a result of the exit process. Similarly, the Applicant should make effort to ensure that assessments undertaken for the ES are prepared on the basis of known or likely changes in legal requirements prior to submission of any DCO application.

2. THE PROPOSED DEVELOPMENT

1. Introduction

2.0.1 The following is a summary of the information on the Proposed Development and its site and surroundings prepared by the Applicant and included in their Scoping Report. The information has not been verified and it has been assumed that the information provided reflects the existing knowledge of the Proposed Development and the potential receptors/ resources.

2.1 Description of the Proposed Development

2.1.1 The Applicant's description of the Proposed Development, its location and technical capacity is provided in Scoping Report Chapter 2: Description of the Proposed Development. A site location plan is provided at Figure 1.1, with a plan showing the surrounding area in Figure 2.2.

2.1.2 The Proposed Development comprises an Energy from Waste (EfW) Combined Heat and Power (CHP) Facility, a CHP Connection, a Grid Connection, Access Improvements and a Temporary Construction Compound (which includes potential additional land for a substation).

2.1.3 The application site for the EfW CHP Facility forms is shown in Figure 2.1 It forms part of a wider industrial estate currently operated by Frimstone Ltd as a waste recycling and transfer station.

2.1.4 The proposed CHP Connection would run up a disused railway line, known as the 'Bramley' Line as far as the Nestle factory; this is shown in Figure 2.4.

2.1.5 There are two Grid Connection options including either a 132kV connection or a 400kV connection. Both options start at the EfW CHP Facility and share a common connection corridor running east of Wisbech where it then splits; with the 132kV route continuing north to Walpole, and the 400kV connection continuing east to meet an existing 400 kV line beyond Emneth Hungate. The Grid Connection corridors are shown in Figure 2.5. The Applicant has not yet determined whether the Grid Connection would form part of the authorised development or be delivered via a separate agreement.

2.1.6 The Scoping Report states that there are two potential locations for Temporary Construction Compounds; one located immediately adjacent to the southeast of the EfW CHP Facility Site, and the second located to the south of New Bridge Lane on land currently used for agricultural purposes and with a residential property. These are shown in Figure 2.3.

2.2 The Planning Inspectorate's Comments

Description of the Proposed Development

2.2.1 Chapter 2 of the Scoping Report provides a description of the Proposed Development. The Scoping Report lacks in-depth detail for all elements of the Proposed Development. The ES should clearly describe all elements of the Proposed Development and describe if they are associated development or not. The Applicant is reminded of the importance to ensure that the ES includes a description of all physical characteristics of the Proposed Development. Where uncertainty exists and flexibility is sought this should be explained not only in terms of the maximum parameters but also the anticipated limits of deviation, the dimensions, locations, and alignments of the various project elements, including points of access and key structures. This information is important to ensure that any potential significant effects associated with the construction and operation stages have been appropriately assessed. The ES should provide figures to support the project description and depict the necessary detail.

2.2.2 The ES should contain a general construction programme (building on the information contained in section 2.3 of the Scoping Report). This should make it clear how and when the specific works / phases will take place, what the resulting effects will be and how they will be managed. It should provide a description of the land use requirements during both the construction and operational phases. It is also important that the ES clearly identifies and distinguishes areas of land within the order limits which are required either permanently or on a temporary basis, as well as their intended use and duration of use.

2.2.3 Paragraph 2.3.58 of the Scoping Report indicates that the proposals allow for temporary access tracks, access points, set up of laydown, working areas and construction compounds. The ES should detail the locations and extents of these features and factor them into the assessments undertaken.

2.2.4 The Applicant has not yet determined if the Grid Connection will be included as authorised development in the DCO. The Inspectorate acknowledges that the chosen consenting route could affect the level of detail available for the dDCO application. If the Grid Connection is included in the dDCO as authorised development, the ES should include a detailed description of this development and the works required. If the Grid Connection is to be consented separately, the ES should present a sufficiently detailed a description of the works and their associated likely significant effects based on what is available at the time.

2.2.5 Paragraph 2.3.43 of the Scoping Report explains that the Grid Connection route would likely comprise both overhead lines and underground cables. These elements should be clearly depicted on figures within the ES. If horizontal directional drilling (HDD) techniques are required, their associated launch and receptor pits should also be described and identified within the ES. Where HDD techniques are proposed as a form of mitigation to address significant effects, these should be demonstrably secured through the dDCO or other legal mechanism.

2.2.6 The Scoping Report states that a 132kV or 400kV substation may be required, however no details have been provided on this element and no consideration has been given to it in the aspect chapters (with the exception of a brief mention in the Noise and Vibration chapter). The ES should contain a description of these works and assess any likely significant effects that could arise from their construction and operation.

2.2.7 The Scoping Report indicates in Paragraph 14.6.13 that temporary road diversions and closures may be required throughout the construction phase. The ES should contain a full explanation of such closures and diversions, including whether they are temporary or permanent, and associated impacts should be fully assessed. This should also include any closures or diversions to Public Footpaths or Rights of Way. This information should also be depicted on figures in the ES, to provide further clarity.

2.2.8 The ES should identify the sources, types and proportions of waste to be managed by the facility in order to inform the assessment of potential environmental effects.

Alternatives

2.2.9 The EIA Regulations require that the Applicant provide 'A description of the reasonable alternatives (for example in terms of development design, technology, location, size and scale) studied by the developer, which are relevant to the proposed project and its specific characteristics, and an indication of the main reasons for selecting the chosen option, including a comparison of the environmental effects'.

2.2.10 The Inspectorate acknowledges the Applicant's intention to consider alternatives (site layout, design and access) within the ES. The ES should also address alternative locations, where these have been considered. The Inspectorate would expect to see a discrete section in the ES that provides details of the reasonable alternatives studied and the reasoning for the selection of the chosen options, including a comparison of the environmental effects.

Flexibility

2.2.11 The Applicant's attention is drawn to the Inspectorate's Advice Note Nine 'Using the 'Rochdale Envelope'[1], which provides details on the recommended approach to follow when incorporating flexibility into a draft DCO (dDCO).

2.2.12 The Applicant should make every attempt to narrow the range of options and explain clearly in the ES which elements of the Proposed Development have yet to be finalised and provide the reasons. At the time of application, any Proposed Development parameters should not be so wide-ranging as to

[1] Advice Note nine: Using the Rochdale Envelope. 2012. Available at: https://infrastructure.planninginspectorate.gov.uk/legislation-and-advice/advice-notes/

represent effectively different developments. The development parameters will need to be clearly defined in the dDCO and in the accompanying ES. It is a matter for the Applicant, in preparing an ES, to consider whether it is possible to robustly assess a range of impacts resulting from a large number of undecided parameters. The description of the Proposed Development in the ES must not be so wide that it is insufficiently certain to comply with the requirements of Regulation 14 of the EIA Regulations.

2.2.13 It should be noted that if the Proposed Development materially changes prior to submission of the DCO application, the Applicant may wish to consider requesting a new scoping opinion.

3. ES APPROACH

3.1 Introduction

3.1.1 This section contains the Inspectorate's specific comments on the scope and level of detail of information to be provided in the Applicant's ES. General advice on the presentation of an ES is provided in the Inspectorate's Advice Note Seven 'Environmental Impact Assessment: Process, Preliminary Environmental Information and Environmental Statements'[2] and associated appendices.

3.1.2 Aspects/ matters (as defined in Advice Note Seven) are not scoped out unless specifically addressed and justified by the Applicant, and confirmed as being scoped out by the Inspectorate. The ES should be based on the Scoping Opinion in so far as the Proposed Development remains materially the same as the Proposed Development described in the Applicant's Scoping Report.

3.1.3 The Inspectorate has set out in this Opinion where it has/ has not agreed to scope out certain aspects/ matters on the basis of the information available at this time. The Inspectorate is content that the receipt of a Scoping Opinion should not prevent the Applicant from subsequently agreeing with the relevant consultation bodies to scope such aspects/ matters out of the ES, where further evidence has been provided to justify this approach. However, in order to demonstrate that the aspects/ matters have been appropriately addressed, the ES should explain the reasoning for scoping them out and justify the approach taken.

3.1.4 Where relevant, the ES should provide reference to how the delivery of measures proposed to prevent/ minimise adverse effects is secured through DCO requirements (or other suitably robust methods) and whether relevant consultation bodies agree on the adequacy of the measures proposed.

3.2 Relevant National Policy Statements (NPSs)

3.2.1 Sector-specific NPSs are produced by the relevant Government Departments and set out national policy for NSIPs. They provide the framework within which the Examining Authority (ExA) will make their recommendation to the SoS and include the Government's objectives for the development of NSIPs. The NPSs may include environmental requirements for NSIPs, which Applicants should address within their ES.

3.2.2 The designated NPSs relevant to the Proposed Development are the:

- Overarching NPS For Energy (NPS EN-1);

[2] Advice Note Seven: Environmental Impact Assessment: Process, Preliminary Environmental Information and Environmental Statements and annex. Available from: https://infrastructure.planninginspectorate.gov.uk/legislation-and-advice/advice-notes/

- NPS on Renewable Energy Infrastructure (NPS EN-3); and
- NPS for Electricity Networks Infrastructure (NPS EN-5).

3.3 Scope of Assessment

General

3.3.1 The Inspectorate recommends that in order to assist the decision-making process, the Applicant uses tables:

- to demonstrate how the assessment has taken account of this Opinion;
- to identify and collate the residual effects after mitigation for each of the aspect chapters, including the relevant interrelationships and cumulative effects;
- to set out the proposed mitigation and/ or monitoring measures including cross-reference to the means of securing such measures (eg a dDCO requirement);
- to describe any remedial measures that are identified as being necessary following monitoring; and
- to identify where details are contained in the Habitats Regulations Assessment (HRA report) (where relevant), such as descriptions of European sites and their locations, together with any mitigation or compensation measures, are to be found in the ES.

3.3.2 The Scoping Report states that the 'Main Development Site' includes the EfW CHP Facility, the CHP connection and Access Improvements. However it is not always clear in the aspect chapters whether all of these elements have been addressed, and in some chapters the EfW CHP facility and the CHP connection have been considered separately. In addition, the baseline environment and consideration of impacts from the Grid Connection, Temporary Construction Compound, access works and substation have been inconsistently addressed. The Inspectorate expects the ES to assess any likely significant effects arising from the construction, operation and decommissioning of all elements of the Proposed Development and for this to be clearly and consistently reported within the ES.

3.3.3 The Inspectorate agrees that the Grid Connection works should be assessed within the ES either as part of the authorised development or as other development within the cumulative assessment (subject to the chosen consenting option).

3.3.4 The Inspectorate agrees that the ES should assess the potential for cumulative effects from the Proposed Development with other developments in the locality. Justification for, and the extent of, the cumulative effects assessment study area should be clearly explained, and cumulative effects considered for construction, operation and decommissioning. The Inspectorate is aware of a number of other NSIPs in the vicinity of the Proposed Development, particularly in Norfolk, as well as proposals for other developments (notably housing schemes) in the vicinity of the application site. The Applicant should

ensure that the scope of the cumulative assessment assess is sufficiently broad to enable an assessment of any likely significant effects with these other developments.

3.3.5 The ES should assess any likely significant effects resulting from the introduction of pests. Any measures proposed to manage pests should be described.

Baseline Scenario

3.3.6 The ES should include a description of the baseline scenario with and without implementation of the development as far as natural changes from the baseline scenario can be assessed with reasonable effort on the basis of the availability of environmental information and scientific knowledge. The ES should clearly set out assumptions that have been made in respect of future baseline conditions.

3.3.7 It is not always clear within the Scoping Report whether the baseline environment presented throughout the Scoping Report aspect chapters encompasses the entire application site. The ES should identify the baseline for the application site in its entirety.

Forecasting Methods or Evidence

3.3.8 The ES should contain the timescales upon which the surveys which underpin the technical assessments have been based. For clarity, this information should be provided either in the introductory chapters of the ES (with confirmation that these timescales apply to all chapters), or in each aspect chapter.

3.3.9 The Inspectorate expects the ES to include a chapter setting out the overarching methodology for the assessment, which clearly distinguishes effects that are 'significant' from 'non-significant' effects. Any departure from that methodology should be described in individual aspect assessment chapters.

3.3.10 The ES should include details of difficulties (for example technical deficiencies or lack of knowledge) encountered compiling the required information and the main uncertainties involved.

Residues and Emissions

3.3.11 The EIA Regulations require an estimate, by type and quantity, of expected residues and emissions. Specific reference should be made to water, air, soil and subsoil pollution, noise, vibration, light, heat, radiation and quantities and types of waste produced during the construction and operation phases, where relevant. This information should be provided in a clear and consistent fashion and may be integrated into the relevant aspect assessments.

3.3.12 The Scoping Report has not considered the potential for electro-magnetic fields (EMF) to arise from the Proposed Development. The ES should assess any impacts from EMF, where significant effects are likely to occur.

Mitigation and Monitoring

3.3.13 Specific mitigation measures have not been identified at this stage. Any mitigation relied upon for the purposes of the assessment should be explained in detail within the ES. The likely efficacy of the mitigation proposed should be explained with reference to residual effects. The ES should also address how any mitigation proposed is secured, with reference to specific DCO requirements or other legally binding agreements.

3.3.14 The ES should identify and describe any proposed monitoring of significant adverse effects and how the results of such monitoring would be utilised to inform any necessary remedial actions.

Risks of Major Accidents and/or Disasters

3.3.15 The ES should include a description and assessment (where relevant) of the likely significant effects resulting from accidents and disasters applicable to the Proposed Development. The Applicant should make use of appropriate guidance (e.g. that referenced in the Health and Safety Executives (HSE) Annex to Advice Note 11) to better understand the likelihood of an occurrence and the Proposed Development's susceptibility to potential major accidents and hazards. The description and assessment should consider the vulnerability of the Proposed Development to a potential accident or disaster and also the Proposed Development's potential to cause an accident or disaster. The assessment should specifically assess significant effects resulting from the risks to human health, cultural heritage or the environment. Any measures that will be employed to prevent and control significant effects should be presented in the ES.

3.3.16 Relevant information available and obtained through risk assessments pursuant to European Union legislation such as Directive 2012/18/EU of the European Parliament and of the Council or Council Directive 2009/71/Euratom or relevant assessments carried out pursuant to national legislation may be used for this purpose provided that the requirements of this Directive are met. Where appropriate, this description should include measures envisaged to prevent or mitigate the significant adverse effects of such events on the environment and details of the preparedness for and proposed response to such emergencies.

Climate and Climate Change

3.3.17 The ES should include a description and assessment (where relevant) of the likely significant effects the Proposed Development has on climate (for example having regard to the nature and magnitude of greenhouse gas emissions) and the vulnerability of the project to climate change. Where relevant, the ES should describe and assess the adaptive capacity that has been incorporated into the design of the Proposed Development. This may include, for example, alternative measures such as changes in the use of materials or construction and design techniques that will be more resilient to risks from climate change.

Transboundary Effects

3.3.18 Schedule 4 Part 5 of the EIA Regulations requires a description of the likely significant transboundary effects to be provided in an ES. The Scoping Report has not indicated whether the Proposed Development is likely to have significant impacts on another European Economic Area (EEA) State.

3.3.19 Regulation 32 of the EIA Regulations inter alia requires the Inspectorate to publicise a DCO application on behalf of the SoS if it is of the view that the proposal is likely to have significant effects on the environment of another EEA state, and where relevant, to consult with the EEA state affected.

3.3.20 The Inspectorate considers that where Regulation 32 applies, this is likely to have implications for the examination of a DCO application. The Inspectorate recommends that the ES should identify whether the Proposed Development has the potential for significant transboundary impacts and if so, what these are and which EEA States would be affected.

A Reference List

3.3.21 A reference list detailing the sources used for the descriptions and assessments must be included in the ES.

3.4 Confidential Information

3.4.1 In some circumstances it will be appropriate for information to be kept confidential. In particular, this may relate to information about the presence and locations of rare or sensitive species such as badgers, rare birds and plants where disturbance, damage, persecution or commercial exploitation may result from publication of the information. Where documents are intended to remain confidential the Applicant should provide these as separate paper and electronic documents with their confidential nature clearly indicated in the title, and watermarked as such on each page. The information should not be incorporated within other documents that are intended for publication or which the Inspectorate would be required to disclose under the Environmental Information Regulations 2004.

4. ASPECT BASED SCOPING TABLES

4.1 Traffic and Transport

(Scoping Report section 5)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
4.1.1	n/a	n/a	No matters are proposed to be scoped out the assessment.

ID	Ref	Other points	Inspectorate's comments
4.1.2	5.4.3 and 5.4.5	Traffic and transport assessment	The Scoping Report makes reference to the production of a traffic and transport assessment, but no further details are provided. The Applicant should make effort to agree the scope of the traffic and transport assessment with the relevant local highways authority and Highways England.
4.1.3	5.4.14	New access (Southern Access Road)	The Scoping Report states that the Wisbech Access Strategy proposes a new access road ('the Southern Access Road') to the south of the Proposed Development site; this would link New Bridge Lane to the south of the Proposed Development with Boleness Road to the east. The traffic and transport assessment should reflect the use of this possible new access to the extent that it can be relied upon in terms of delivery. Any likely significant cumulative effects from the construction of the Southern Access Road with the Proposed Development should be assessed. The Cambridgeshire County Council response also notes a number of strategic projects in adopted and emerging policy. The Applicant should consider the implications of the Proposed Development on these schemes and assess any likely significant cumulative effects

ID	Ref	Other points	Inspectorate's comments
			resulting from their construction and operation.
4.1.4	5.5.3	Grid connection	The ES should identify any roads that would be crossed by the Grid Connection and describe the likely crossing methods and works to be employed. Any likely significant effects resulting from these works should be assessed.
4.1.5	5.5.7	Potential significant effects	Paragraph 5.5.7 of the Scoping Report states that abnormal indivisible loads are not anticipated to be used. Paragraph 2.5.53 states that mechanisms would be put in place for abnormal load deliveries. As the traffic movements associated with the Proposed Development during construction and operational phases are not currently known, it is considered that the potential for significant effects from hazardous, dangerous or abnormal loads should be assessed for the construction and operational phases.
4.1.6	5.5.8 and 5.5.9	Traffic movements	The ES should include a description of the number, type and timings of vehicles which would be accessing the site during construction and operational phases. This should include the anticipated HGV and staff vehicle movements during construction and total operational traffic numbers including the impact of removing non-recyclable materials. The ES should identify and assess impacts on the likely operational transport routes having regard to the anticipated origins of the fuel waste. Any assumptions applied in this assessment should be explained and justified within the ES.

4.2 Noise and Vibration

(Scoping Report section 6)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
4.2.1	6.5.15	Construction vibration due to piling due to the routing of CHP ducting or the location of the transmission towers	The Inspectorate agrees that if it is determined that no piling is required, this matter can be scoped out. The Scoping Report states that a construction vibration assessment would be undertaken, if piling is required, on receptors located less than 100m from activity. The Scoping Report infers that significant vibration effects are unlikely to receptors located more than 100m from the activity, but this has not been justified with reference to relevant evidence. The Inspectorate considers that impacts associated with piling activities should be assessed within the ES where significant effects are likely to occur. Impacts from piling are relevant to a range of different receptors and should be addressed in such an assessment. If there is uncertainty regarding the need for and location of piling activities, the assessment must be based on worst case assumptions. Any assumptions used to inform the assessment should be clearly defined, justified and explained in the ES.
4.2.2	6.5.16	Operational vibration	The Inspectorate does not consider that the Scoping Report provides a robust justification supporting a decision to scope this matter out of the assessment. The Inspectorate notes that the route for traffic movements during operation (including HGV movements) has not yet been finalised and therefore impacts from vibration may occur in proximity to sensitive receptors. The ES should assess impacts associated with operational vibration from increased HGV movements where significant effects are likely to occur.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
4.2.3	6.5.17	Noise emissions during construction and operational phases on residential receptors referred to as 'Other nearest receptors to the Energy from Waste CHP Facility'	The Inspectorate notes that the 'Other nearest receptors to the Energy from Waste CHP Facility' are a minimum of 450m from the EfW CHP Facility site, with intervening structures which would attenuate noise emissions. An assessment of noise emissions is proposed for closer receptors. The Inspectorate is content that significant effects on 'Other nearest receptors' are unlikely to occur and that noise emissions from the EfW CHP Facility to 'Other nearest receptors to the Energy from Waste CHP Facility' can be scoped out of the assessment.

ID	Ref	Other points	Inspectorate's comments
4.2.4	2.3.23	Receptors	Table 6.5 does not identify receptors for the Temporary Construction Compound. The ES should include an assessment of noise from the compound where significant effects are likely. In particular, the Scoping Report explains that a residential property is located on a site which is being considered for use as a Temporary Construction Compound. The ES should assess any likely significant effects on the residential property in the event that this option is progressed.

4.3 Air Quality

(Scoping Report section 7)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
4.3.1	7.5.34	Operational effects related to Grid Connection	The Inspectorate agrees that significant effects from the operational Grid Connection are unlikely to occur and this matter may be scoped out from the ES.
4.3.2	7.5.35	Construction plant emissions during the construction phase	The Scoping Report requests to scope out construction plant emissions as they are controlled by the Non- Road Mobile Machinery (Type-Approval and Emission of Gaseous and Particulate Pollutants) Regulations 2018/764 and as the scale, duration and distance of construction activity to relevant receptors is not considered to be of a magnitude that would require detailed assessment. The Inspectorate notes the uncertainty regarding the anticipated construction techniques and the proposed location of the Temporary Construction Compound. On that basis the Inspectorate considers that impacts to air quality from construction plant should be assessed where significant effects are likely to occur.
4.3.3	7.5.36	Dust emissions during the operational phase	On the basis that all waste, incinerator bottom ash and fly ash handling and storage would be within enclosed buildings, the Inspectorate agrees that significant effects are unlikely to occur and this matter may be scoped out.
4.3.4	7.5.37	Odour emissions during normal operation	The Scoping Report details a number of measures to control likely sources of odour from waste delivery and short-term storage and explains that an Odour Management Plan would be provided. With these measures in place, the Inspectorate is content that significant odour effects are unlikely to occur and that this matter can be scoped

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			out of the ES. However, the Inspectorate would expect the ES to identify the measures that would be put in place and explain how they are secured.
4.3.5	7.5.39	Effects of climate change on air quality	The Scoping Report explains that the net effect of these changes on the baseline air quality is difficult to establish, and are unlikely to significantly alter the baseline air quality to an extent that would affect the outcome of any assessment. Furthermore, that changes in technology and the move away from combusting fossil fuels would potentially lead to decreases in emissions and a corresponding decrease in background concentrations of air pollutants in the future. The Inspectorate agrees that this matter can be scoped out of the assessment.

ID	Ref	Other points	Inspectorate's comments
4.3.6	7.3.1	Nature conservation sites	The Scoping Report applies a 15km study area for impacts from air quality on nature conservation sites. The ES should include a plan that depicts the location of nature conservation sites relative to the Proposed Development, including European sites and Site of Special Scientific Interest.
4.3.7	7.4.2, 7.5.11 and 7.5.22	Air Quality Management Areas (AQMAs)	The Scoping Report identifies three AQMAs, these should be identified by name on an accompanying plan in the ES. Paragraph 7.4.3 states that Fenland District Council expect to revoke Wisbech AQMAs No 1 (1km north of the main development site) and No 2 (1.7km northeast of the main development site) due to the source of pollution being removed. Unless these AQMAs are revoked, the ES should assess the potential for air quality impacts from the Proposed Development on all

ID	Ref	Other points	Inspectorate's comments
			three AQMAs. In particular, it is noted that the Wisbech AQMA along Churchill Road is associated with traffic congestion and is a strategic road route into and out of Wisbech. Air quality impacts to the AQMA should be assessed in the ES.
4.3.8	7.4.4	Air quality monitoring locations	The location of air quality monitoring sites relative to the Proposed Development should be identified on an accompanying plan in the ES.
4.3.9	7.5.1	Receptors	The Scoping Report explains that the ES will assess impacts to both statutory and non-statutory biodiversity sites. Impacts from air quality on individual species should also be considered where significant effects are likely to occur.
4.3.10	7.5.5 and 7.5.6	Study area - dust	The Scoping Report states that in line with IAQM guidance, receptors within 350m of dust generating activities will be considered, and a 50m study area will be applied for biodiversity receptors. The ES should clearly reference the relevant IAQM guidance used. The Applicant should make effort to agree the study area with the relevant consultation bodies.
4.3.11	7.5.12	Chimney emissions	The Inspectorate notes the Applicant's intention to undertake an initial chimney height assessment to determine the optimum chimney height. The ES should identify the location and dimensions of the chimney. Should flexibility be required, any limits of deviation should be taken into account in the dispersion modelling and any other relevant assessments for example landscape and visual.

4.4 Landscape and Visual

(Scoping Report section 8)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
4.4.1	8.5.8	Landscape elements within the main EfW CHP Facility site area (as described in paragraphs 8.4.3 and 8.4.4)	The area proposed for the main EfW CHP Facility itself is considered by the Applicant to be of "low landscape value" based on its current use (for aggregate storage and distribution with plant and metal clad, shed-like buildings) and the condition of boundary fencing and hedgerows etc. The Inspectorate is content that impacts to landscape elements within the main Proposed Development site are not likely to result in significant effects and this matter can be scoped out of the ES.
4.4.2	8.5.9 and 8.5.5	Effects on Fenland, Wisbech Settled Fen, West Norfolk and King's Lynn Local Character Areas (LCAs) during the construction period	The Applicant has requested to refine the scope in relation to impacts on LCAs from construction of the EfW CHP Facility element of the Proposed Development. However, the Inspectorate understands that large equipment would be present on the site during the construction period, therefore impacts to LCAs should be assessed where significant effects are likely. Paragraph 8.5.6 of the Scoping Report makes it clear that operational effects of the Proposed Development (including potential Grid Connection options) on both LCAs are within the scope of the assessment. The Inspectorate agrees that these matters should be assessed within the ES.
4.4.3	8.5.9 and 8.5.5	Landscape effects during construction from an underground Grid Connection	The Scoping Report presents the view that the Grid Connection construction corridor would be narrow with trenches open for only short periods, and that the route would be designed to "avoid the need to remove landscape elements such as shelterbelts and important individual mature trees". The Scoping Report also states

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			that hedgerows may need to be removed and replanted and that this would result in "no long-term effects upon any landscape characteristics". The Inspectorate considers there is uncertainty around the selection of any underground cable route and resultant need for and extent of tree and hedgerow removal (as well as limited information on the duration of reinstatement and recovery). As such the Inspectorate does not agree that construction effects on landscape features associated with an underground Grid Connection can be scoped out of the ES. The ES should assess any likely significant effects to landscape features during construction of the underground Grid Connection.
4.4.4	8.5.25	Visual receptors and effects scoped out of the assessment	The Applicant seeks to scope out an assessment of visual impacts on communities and groups of individual residential properties that are entirely outside of the preliminary Zone of Theoretical Visibility (ZTV). The Inspectorate is content with this approach. The Applicant also seeks to scope out an assessment of visual impacts on communities and groups of individual residential properties more than 1km from the potential 132kV overhead line route and 3km from the potential 400kV overhead line route. The Inspectorate does not consider that there is robust justification provided to support this approach and is concerned that the potential for significant effects beyond these (apparently) arbitrarily defined areas exists. As such, the Inspectorate does not agree to the approach of the assessment in this regard. The Inspectorate considers that the assessment of likely significant effects should be established according to the extent of the impacts and the potential for likely significant effects rather than pre-determined distances.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
4.4.5	8.5.26	Recreational visual receptors visiting Peckover House and Garden	The Inspectorate has had regard to that nature of the built environment (existing extensive light industrial and commercial development) and the separation distance between the Proposed Development site and Peckover House and Garden, coupled with the assertion in the Scoping Report that long-distance southern views of the Proposed Development will not occur. The Inspectorate agrees that this matter can be scoped out of the assessment as significant visual effects are not likely to occur.
4.4.6	8.5.27 – 8.5.29	Visual receptors - visitors at the Belgrave Retail Park, employees at businesses in southern Wisbech (industrial and business development) and pupils and staff at the TBAP Unity Academy and Thomas Clarkson Academy)	The Scoping Report seeks to scope out the assessment of visual effects on visitors at the Belgrave Retail Park, employees at businesses in southern Wisbech (industrial and business development) and pupils and staff at the TBAP Unity Academy and Thomas Clarkson Academy. The Scoping Report explains that these "visual receptors likely to be less sensitive to change" and "…whose attention may be focused on their work or activity, not on their surroundings, and where the setting is not important to the quality of working life …" suggesting this approach accords with guidance in the Guidelines for Landscape and Visual Impact Assessment Version 3 (GLVIA3). Having regard to the existing baseline conditions including the characteristics of the receiving environment, light industrial and commercial development, the Inspectorate agrees that significant effects to visual receptors at the Belgrave Retail Park, businesses in southern Wisbech and pupils and staff at the TBAP Unity Academy and Thomas Clarkson Academy can be scoped out of the ES. The Inspectorate also considers that representative viewpoints as shown on Figure 8.7 would provide suitable proxies for these receptors.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
4.4.7	8.6.15	Visual impacts of the CHP Connection	The Applicant has assumed that visual impacts of the proposed CHP Connection could be scoped out on the basis that the infrastructure (as described at 2.3.36 – 2.3.39) would be screened by the existing built development along the disused railway corridor. Whilst the Inspectorate notes that that the route shown in Figure 2.2 would follow the disused railway line largely through the industrial estate, there are a number of residential properties at the northern end of the route on Oldfield Lane, Victory Road, Burdett Road and Hilburn Road (referred to at 2.3.14). There is limited detail in the Scoping Report as to the extent of screening vegetation clearance that may be required to facilitate the construction of the CHP pipeline. It is also unclear whether additional infrastructure may be required at the Nestle factory facility end of the CHP pipeline. Therefore the Inspectorate does not agree that this matter can be scoped out of the ES. The ES should assess impacts to these residential receptors where significant effects are likely.

ID	Ref	Other points	Inspectorate's comments
4.4.8	8.3.1 – 8.3.3, 8.4.8 and Figure 8.4	Study area	The Inspectorate has had regard to the proposed approach to defining study areas for the assessment of visual impact within the ES. The Inspectorate considers that the study areas should be established relevant to the extent of the impact and the potential for likely significant effect rather than any predetermined arbitrary distance. The study areas should be applicable to the impacts that will occur during both construction and operational phases of the Proposed Development and take into account the characteristics of the receiving environment.

ID	Ref	Other points	Inspectorate's comments
4.4.9	8.3.2	Data sources and night-time views	Footnote 79 of the Scoping Report refers to the Campaign to Protect Rural England (CPRE) light pollution and dark skies mapping. No further reference is made in section 8.5 to the assessment of night-time visual impacts during construction and operation. The ES should include a description of the anticipated lighting levels for the Proposed Development and assess impacts on night time views where significant effects are likely to occur.
4.4.10	8.4.30 – 8.4.39, Table 8.2 and Figure 8.7	Visual baseline and viewpoint selection	The Inspectorate agrees with Cambridgeshire County Council and Fenland Council that the number of visual receptors is insufficient for a project of this scale. The Applicant should ensure that the study area is relevant to the extent of the anticipated impacts and effort should be made to agree visual receptors and viewpoints in consultation with the relevant consultation bodies.
4.4.11	8.4.41 – 8.4.42	Future baseline – wider landscape change	The Scoping Report identifies the potential for The Fens to be affected by new wind energy schemes and climate change in the future. It also notes housing allocated in the local plan. Any assumptions made regarding the future baseline should be presented in the ES.
4.4.12	Section 8.5	Townscape	Section 8.5 sets out the proposed scope of works including landscape and visual effects; no specific reference has been made to the assessment of townscape. The ES should assess impacts to townscape, where significant effects are likely to occur.
4.4.13	8.5.22	Visualisations	Photomontages/visualisations should be provided to demonstrate the possible visual impacts of the scheme. These should show visual effects on completion of the project (0 years) and after the establishment of the landscaping scheme (15 years). The Applicant should seek to agree the methodology for, and number of required visualisations with the relevant consultation bodies.

ID	Ref	Other points	Inspectorate's comments
4.4.14	8.6.15	Assumptions – plume visibility	The Applicant states that the plume would be "periodically" emitted from the chimney during operation of the plant and would be "intermittent". It is unclear why this is the case for a continual combustion process and this should be explained in the ES. The LVIA should set out assumptions in regard to frequency and duration in accordance with combustion and other operational assumptions elsewhere in the ES (including Air Quality).
4.4.15	Figure 8.2	ZTV – EfW CHP Facility	The ZTV provided in the Scoping Report for the EfW CHP Facility shows the extent of visibility of the buildings and the chimney overlaid on a single figure, so it is not possible to see the difference between the two. The ES should provide separate ZTVs to aid in this understanding.
4.4.16	n/a	Planting	The Inspectorate would expect the ES to include details of any planting and landscape works referred to in paragraph 2.3.56 of the Scoping Report.

4.5 Historic Environment

(Scoping Report section 9)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
4.5.1	9.5.4	Operational effects of an underground Grid Connection option	The Inspectorate agrees that during operation the underground Grid Connection option is unlikely to significantly affect the setting of heritage assets. Accordingly, the Inspectorate considers that this matter can be scoped out of the ES.
4.5.2	9.5.5	Direct disturbance from construction of the main EfW CHP Facility	The Applicant states that existing development and use of the main EfW CHP Facility site is expected to have removed any archaeological remains within the main site boundary. Notwithstanding the comments in row 4.5.5 below, the Inspectorate agrees that impacts to superficial archaeological deposits at the EfW CHP Facility site are unlikely to result in significant effects and can be scoped out of the ES. However, the Inspectorate notes and agrees that any significant effects on heritage assets at the Temporary Construction Compound (location to be determined) will be assessed in the ES.
4.5.3	9.5.5	Operational effects of the EfW CHP Facility on the settings of any heritage assets	The Applicant suggests there is very limited visibility of the proposed EfW CHP Facility and chimney from parts of Wisbech Conservation Area, and from listed buildings within the conservation area. It states that such views would be in the context of the intervening industrial area to the south of the Wisbech Conservation Area and so would not introduce a notably new element which would adversely affect the settings of these assets. Given the proximity of the Proposed Development to the Wisbech Conservation Area, and having regard to the nature and

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			characteristics of the Proposed Development, the Inspectorate does not agree that these matters should be scoped out of the assessment. The ES should include an assessment of effects on the Wisbech Conservation Area and other relevant heritage assets. Efforts should be made to identify the relevant heritage assets to be assessed with the relevant consultation bodies.

ID	Ref	Other points	Inspectorate's comments
4.5.4	9.3.1	Study areas / search areas	The Grid Connection corridor comprises the study area for direct disturbance, but no study area has been proposed in relation to impacts to setting from this project element. This should be identified and justified in the ES. As with the Landscape and Visual Assessment study areas, the Inspectorate considers that the study areas for the Historic Environment should be established relevant to the extent of the impact and the potential for likely significant effect rather than any predetermined arbitrary distance. The study areas should be applicable to the impacts that will occur during both construction and operational phases of the Proposed Development and take into account the characteristics of the receiving environment.
4.5.5	9.6.1	Baseline	The Scoping Report makes no reference to potential need for field investigation to further inform the assessment (which may arise as a result of desk study findings) and / or further design iteration of the cable connection options and routing in particular. Cambridgeshire County Council's response notes the presence of tidal flats around Wisbech and The Wash, including the EfW CHP Facility site. A geoarchaeological strategy should therefore be implemented to

ID	Ref	Other points	Inspectorate's comments
			inform the baseline environment where deep excavations are proposed and significant effects are likely to occur.
4.5.6	9.6.5	Mitigation	Beyond paragraph 9.6.5, there is no further reference to the need for or type of mitigation measures that might be proposed, for example archaeological written schemes of investigation, and how the need for such measures would be determined in response to potentially significant effects identified. The ES should clearly set out where mitigation measures are embedded in to the design or where reliance is being placed on further investigation works (and the residual effects in this regard).
4.5.7	Table 4.2	Significance	Table 4.2 explains that 'Major' or 'Moderate' effects would normally be deemed to be significant. Section 9.6 does not explain the level of significance that would trigger the need for mitigation measures.
4.5.8	9.6.6 and Table 9.3	Non-designated heritage assets	The Scoping Report has not identified non-designated heritage assets. These should be identified within the ES and any impacts on them assessed, where significant effects are likely to occur.

4.6 Biodiversity

(Scoping Report section 10)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
4.6.1	n/a	n/a	No matters are proposed to be scoped out the assessment.

ID	Ref	Other points	Inspectorate's comments
4.6.2	10.3.1	Study areas	The Applicant should make every effort to agree the spatial extent of the study areas with relevant consultation bodies, which should be refined and informed by the results of further detailed Phase 1 habitat survey work.
4.6.3	Tables 10.2 and 10.2	Surveys	No botanical surveys have not been proposed within the Scoping Report. These should be undertaken for priority habitats and habitats suspected of being of county level importance. Botanical surveys should also be undertaken where suitable conditions are present for potentially rare / notable plants or assemblages or priority species of plants.
4.6.4	Section 10.4	Baseline	The baseline should include identification of locally important sites, for example County Wildlife Sites. Section 10.4 makes no reference to the potential ecological value and effects associated with the CHP Connection. Paragraph 2.3.14 of the Scoping Report refers to the disused railway line as being "heavily overgrown with vegetation", but no further details are provided as to the approach to the assessment in this regard. This detail should be provided within the ES. Tables 10.2 and 10.3 make reference to further survey works for the

ID	Ref	Other points	Inspectorate's comments
			main development site and Grid Connection respectively, but it is unclear if the "main development site" includes the CHP corridor in this context. The Inspectorate notes that paragraph 10.5.10 makes general reference to "Potential effects on other ecological features (such as mature trees) due to loss or damage arising from construction activities". The ES should include an assessment of any likely significant effects associated with the development of the CHP Connection corridor in this regard.
4.6.5	10.5.1 / footnote 110	Guidance	The Applicant is advised that CIEEM's guidelines for Ecological Impact Assessment (EcIA) was updated in 2019. The Applicant should have regard to the most recent version of the guidelines when undertaking the assessment of ecological impacts.
4.6.6	10.5.10 (and 10.4.4)	Construction effects on aquatic ecology	The Inspectorate considers that there will be a degree of overlap between the biodiversity and hydrological assessments and expects that this will be reflected in the aspect chapters. The Scoping Report makes no reference to impacts on aquatic habitats and species from anticipated changes in water quality. The Inspectorate considers this is likely to be of particular relevance given the description of baseline conditions at 10.4.4. The ES should assess impacts to water quality and the consequences for relevant habitats and species. Impacts to ecology from trenching works required for the Grid Connection should also be assessed.
4.6.7	10.5.10	Operational effects – collision mortality	An assessment of the impacts from collision mortality with the Grid Connection should be provided, where significant effects are likely to occur. This should be informed by surveys of breeding, wintering and migratory birds (the latter of which is not currently proposed in the Scoping Report).

ID	Ref	Other points	Inspectorate's comments
4.6.8	10.5.10	Designated sites	The assessment of effects on designated biodiversity sites should consider any likely significant effects on functional land located beyond designation boundaries.
4.6.9	10.6.12	Assumptions	The Inspectorate recognises that the scope of the assessment as presented in Chapter 10 of the Scoping Report is based on a high-level desk study of the site and that "It is expected that the survey scope will be refined following the results of the Phase 1 habitat survey and will be agreed with the relevant consultees". The Applicant should ensure that all significant effects to ecological receptors associated with the Proposed Development are robustly assessed within the ES. The Applicant should make effort to agree the need for and approach to species specific surveys to inform the assessment with relevant consultation bodies.
4.6.10	n/a	European Protected Species Licences	The ES should be clear in describing the need for any EPSMLs and how any measures necessary to enable their successful implementation are to be secured through the DCO or other appropriate legal mechanisms.
4.6.11	n/a	Mitigation and enhancement	The ES, should distinguish between mitigation measures proposed to address significant effects from the Proposed Development and any compensation / enhancement proposals which are included for other purposes but which are not relied upon in the assessment of significance of effects in the ES.

4.7 Hydrology

(Scoping Report section 11)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
4.7.1	n/a	n/a	No matters are proposed to be scoped out the assessment.

ID	Ref	Other points	Inspectorate's comments
4.7.2	11.3.1 and Figure 10.3	Study area	Figure 10.3 of the Scoping Report depicts the water bodies located within 500m of the Proposed Development, yet the extent of the study area is described as being 1.5km from the Proposed Development. The Applicant should make effort to agree the study area with relevant consultation bodies. A plan should be provided which shows all of the hydrological features identified within the study area.
4.7.3	11.4.5	Works affecting drainage ditches	If the Proposed Development includes works that may affect the existing drainage regime, including ditches, these should be assessed in the ES where significant effects are likely to occur. The assessment should specifically address the works required for the Grid Connection and the use of HDD. Cross reference should be provided where there may be impacts on ecology or protected species.
4.7.4	11.4.18	Baseline	The ES should assess potential impacts from the Proposed Development during construction and operation on all protected nature conservation sites and not solely focus on European sites. The Applicant should make effort to agree which sites should be included in the assessment with the relevant consultation bodies.

ID	Ref	Other points	Inspectorate's comments
4.7.5	11.5.2	Identification of receptors	It is not clear whether residential receptors have been included within the list of identified flood risk receptors. The ES should also consider the impact from hydrology on nearby residential properties.
4.7.6	Section 11.5	Potential new access route	The ES should explain the potential impacts on hydrology from the construction of the possible new access route to the south of the site.
4.7.7	11.5.4	Flood Risk Assessment	The Applicant should make effort to agree the scope of the assessment from flood risk with the relevant consultation bodies. The Applicant should ensure that climate change allowances used to inform the assessment are sufficiently up to date and reflect relevant guidance from the Environment Agency (EA). The ES should clearly state which allowances have been used for the purposes of the assessment of all flood risk types, how they compare to the EA's current guidance, applicable at the time of submission of the application, and identify any differences should they occur.
4.7.8	12.4.15	Works to culverts	It is not clear whether any works to existing culverts or new culverts would be required as part of the Proposed Development, potentially to support access improvements. Any such works should be described (including locations and dimensions) and fully assessed in the ES.

4.8 Geology, Hydrogeology and Contaminated Land

(Scoping Report section 12)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
4.8.1	12.4.11, 12.5.2 and 12.5.4	Geology	Paragraph 12.4.11 provides an overview of the geology at the EfW CHP Facility site and states that there are geological destinations within the 'study area'. However, it is unclear if the information provided in Paragraph 12.4.11 represents the entirety of the application site, or just the main development site where the EfW CHP Facility is to be located. Taking into consideration the lack of geological designations and the brownfield nature of the EfW CHP Facility site, the Inspectorate is content this matter can be scoped out for the EfW CHP Facility site. However, given the uncertainty regarding the remainder of the application site, the Inspectorate does not agree that effects on geology can be scoped out for the other project elements. Accordingly, the ES should include an assessment of these where a significant effect is likely to occur.
4.8.2	12.4.12 - 12.4.14 and 12.5.12	Hydrogeological impacts on shallow groundwater	The Scoping Report states that 'the site' is not located within a Source Protection Zone and that British Geological Society (BGS) borehole evidence for the wider area shows shallow groundwater is perched and discontinuous. It notes that the EfW CHP Facility site is not identified as being susceptible to groundwater flooding and already has existing underground structures. On this basis, the Inspectorate agrees that hydrogeological impacts on shallow groundwater at the EfW CHP Facility site are unlikely to result in significant effects and that this matter can be scoped out of the ES. However, it is unclear whether the hydrogeological baseline

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			information presented in paragraphs 12.4.12 to 12.4.14 for 'the site' cover the full extent of the application site. As such, this matter should be assessed for these project elements, where significant effects are likely.
4.8.3	12.5.12	Impact from contaminated land on construction workers	The Scoping Report is seeking to scope out impacts from contaminated land on construction workers as compliance with the law (e.g. The Health and Safety at Work Act 1974 and The Construction Design and Management Regulations 2015) means that there would be no significant adverse effects on them because of the Proposed Development. The Inspectorate agrees this matter can be scoped out of the assessment however, the Inspectorate would expect the ES to explain the measures that would be employed to achieve compliance with the legislation, and how these would be secured.
4.8.4	12.5.12	Impact on soil resources	The Scoping Report explains that the EfW CHP Facility site is covered in gravel and used for industrial purposes and there are no areas of soft landscaping other than boundary bunds which contain made ground. The Inspectorate therefore agrees that impacts on soil resources at the EfW CHP Facility site are unlikely to result in significant effects and can be scoped out. However, paragraph 12.4.7 states that one of the Temporary Construction Compound options would be located in an area of enclosed farmland therefore any likely significant effects to soil resources should be assessed. No information has been presented in the Scoping Report regarding the baseline conditions of the Grid Connection, CHP routes, or access routes. As such, this matter should be assessed for these project elements, where significant effects are likely.

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
4.8.5	12.5.12	Impact on flora, fauna and ecological systems from contaminated land	The Scoping Report explains that the EfW CHP Facility site is covered in gravel and used for industrial purposes and there are no areas of soft landscaping. The Inspectorate therefore agrees that impacts from contaminated land on flora, fauna and ecological systems at the EfW CHP Facility site are unlikely to result in significant effects and can be scoped out. The Scoping Report also states that any contamination impacts to flora and fauna associated with a buried Grid Connection would likely be short term and negligible, although no baseline information for the Grid Connection has been provided and no evidence presented to justify this conclusion. In addition, no information has been presented in the Scoping Report regarding the baseline conditions of the CHP routes, Temporary Construction Compounds or new access routes. As such, this matter should be assessed for these project elements, where significant effects are likely.

ID	Ref	Other points	Inspectorate's comments
4.8.6	12.4.7	Temporary Construction Compound	Paragraph 12.4.7 of the Scoping Report states that the Temporary Construction Compound would be located on land which "does not appear to have been developed historically". The Scoping Report does not therefore, appear to have assessed the possibility of the Temporary Construction Compound being located on land to the south of New Bridge Lane where a residential property is located. The ES should ensure that the assessment of impacts at the chosen Temporary Construction Compound site is robustly undertaken.
4.8.7	12.4.15	Study area	The study area has been set at 1km from the Proposed Development. Figure 12.1 shows the drainage channels surrounding the EfW CHP

			Facility site, but it is unclear what the scale of this is and whether it represents the 1km study area. The ES should provide a plan which depicts drainage channels in the study area. The Applicant should make effort to agree the study area with relevant consultation bodies.
4.8.8	12.4.16	Existing discharge consent	The ES should explain the relationship between the Proposed Development and the extant discharge consent which applies to the release of final treated effluent to surface water, currently discharged on to the south west corner of the site. If works to the existing discharge apparatus are required to address the siting of the Proposed Development they should be described and any significant effects should be assessed in the ES.
4.8.9	12.6.15	Site investigations	The Scoping Report indicates that site investigations may be required. Details of any site investigation undertaken should be provided in the ES and include plans to support understand of the assessment process.
4.8.10	2.3.32, 2.3.33 and 2.3.34	Sustainable Drainage Systems (SuDS)	Paragraphs 2.3.32 to 2.3.34 state that SuDS are to be used to control drainage on the EfW CHP Facility site. No further information regarding the type, location, or impact the SuDS could have on the existing drainage regime of the landscape has been included in the Scoping Report. This information should be included in the ES and the location and dimensions of SuDS should be depicted on a figure(s).
4.8.11	2.3.56	Earthworks	If earthworks are required to construct the Proposed Development, the ES should describe the earthworks in sufficient detail to allow for a robust assessment of the earthworks and impacts resulting from them to be undertaken and for any potential significant effects to be identified.

4.9 Climate Change

(Scoping Report section 13)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
4.9.1	13.6.7	Emissions associated with land use change	The Scoping Report explains that emissions associated with land use change are usually calculated on a national level. The Inspectorate agrees that impacts from the changes in land use type are not anticipated to result in significant effects and this matter can be scoped out of the assessment.
4.9.2	13.6.8	Reprocessing of incinerator bottom ash and other waste products into recycled materials	The reprocessing of incinerator bottom ash and other waste products into recycled materials would not take place at the Proposed Development; the Scoping Report therefore concludes that the Greenhouse Gas (GHG) emission benefits from these activities would not be attributable to the Proposed Development. The Inspectorate is content that these benefits will not be assessed in the ES but welcomes that a discussion of recyclable products will be provided.

ID	Ref	Other points	Inspectorate's comments
4.9.3	13.1.3	Vulnerability of assets and receptors to climate change	The Scoping Report explains that measures to ensure climate change resilience of the Proposed Development will be reported in the Design and Access Statement and summarised within the Climate chapter of the ES under the sub-heading 'Climate Change Resilience'. The Scoping Report chapter provides details on how impacts to climate would be assessed, but provides no details regarding climate change resilience measures. The ES should describe any potential impacts to the Proposed Development from changes in rainfall, flood risk, temperature, humidity and wind speed (including resilience to

ID	Ref	Other points	Inspectorate's comments
			such impacts) with reference to the UKCP18 and the anticipated lifespan of the Proposed Development. If significant effects are likely to occur, these should be assessed within the ES.
4.9.4	13.6.3	Model	The ES should provide a description of the model used to determine the carbon footprint of the Proposed Development and the future baseline scenario. The ES should state any assumptions made in predicting GHG emissions, any limitations to the calculations and any uncertainties this presents for the assessment of GHG emissions. In terms of the avoided/non-avoided fossil fuel emissions (referred to in paragraphs 13.6.13 and 13.6.16), it should be clear what fuel and technology types have been considered in the calculations.
4.9.5	n/a	Emissions from transport	The ES should assess any likely significant effects to climate that could arise from the transportation of waste. The ES should explain the anticipated origin of waste fuel and describe any methods used to reduce the impacts from importation of such waste.

4.10 Socio-Economics

(Scoping Report section 14)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
4.10.1	14.5.7	Amenity of local residents and community due to traffic, noise, air quality and visual impact	The Inspectorate agrees that a detailed assessment of these matters can be scoped out of the Socio-economic aspect chapter as they will be addressed within the relevant aspect chapters of the ES. However, the Inspectorate expects that adequate cross-referencing and signposting to these matters will be made within the Socio-economic chapter of the ES, with a clear explanation of the significance of these effects in relation to amenity.
4.10.2	14.5.9	Direct effects on tourism and recreation during construction and operation	The Inspectorate agrees that significant direct effects are unlikely from construction and operation of the EfW CHP Facility as it is located within an industrial estate and no known tourism or recreational facilities are located within or in close proximity to it. The proximity of tourism and recreational facilities to other project elements, including the Grid Connection corridor is unclear and any likely significant direct effects to tourism and recreation should be assessed in the ES. The Inspectorate is however content that given the nature of the Grid Connection once operational, significant effects from the operation of the Grid Connection corridor are unlikely to occur and can be scoped out of the ES.
4.10.3	14.5.10 and 14.5.11	Demand for local services and impacts on nearby educational and community facilities and businesses	The Scoping Report notes there would be up to 700 personnel engaged with the construction and up to 350 at any one time. During operation there would be up to 40 full time jobs created. The Inspectorate agrees that the number of operational workers is

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			unlikely to give rise to an increase in population such that there would be a significant increase in demand on housing, local services (such as schools), and community facilities (such as sport and recreation), and that this matter can be scoped out of the ES. However, during construction the numbers will be greater, and the Inspectorate considers that an assessment should be undertaken, where significant effects are likely.

ID	Ref	Other points	Inspectorate's comments
4.10.4	14.3.2	Study area – Grid Connection corridor and CHP line	The Scoping Report concludes that, on the basis of professional judgement, there would be no significant effects beyond 2km from the Grid Connection corridor and CHP route; therefore the study areas are confined to within 2km of the routes. The Inspectorate is unclear how this relates to the statement in paragraph 14.3.1 that the study area covers a local, district and county level. No justification has been provided to support the Applicant's statement, and the Inspectorate considers that impacts, particularly those related to employment, should be assessed on a sufficiently wide scale to identify any likely significant effects.
4.10.5	Section 14.4	Baseline	The ES should identify the location of receptors relative to the Proposed Development, ideally through the provision of figures depicting static receptors.
4.10.6	14.5.1 and Tables 14.2 & 14.3	Land use	Whilst paragraph 14.5.1 states that effects from change of land use will be considered, this is not identified as a potential significant effect requiring further assessment in paragraphs 14.5.4-14.5.6. Nevertheless, Tables 14.2 and 14.3 provide definitions for the various levels of sensitivity and magnitude for land use. For the avoidance of

ID	Ref	Other points	Inspectorate's comments
			doubt, any significant effects to socio-economic receptors from changes in land use should be assessed within the ES.
4.10.7	14.5.5 & 14.5.56	Employment	The ES should include a breakdown of the likely jobs and roles created by the Proposed Development and any mitigation measures such as skills and training programmes that would promote local employment. This should include consideration of the potential to create apprenticeship opportunities during construction and operation.
4.10.8	14.5.5	Effects on retail	Whilst the Scoping Report proposes to assess impacts to businesses, it is unclear whether this includes the Belgrave Retail Park. Construction phase effects to these businesses should be assessed, where significant effects are likely to occur.
4.10.9	Table 14.7	Recreation and tourism magnitude of change	Some of the definitions provided in Table 14.7 in relation to magnitude of change are ambiguous and lack clear definition eg 'a small number' or 'a large number'. Definitions relating to magnitude of change should be quantified where possible. Where this is not considered to be possible and where professional judgement is applied, a clear justification should be provided in the ES for assigning a magnitude of change.
4.10.10	14.7.1	Assumptions	The Scoping Report states that is has been assumed the CHP elements of the Proposed Development will sustain economic activity in the surrounding area. The Socio-economics assessment should take into account any uncertainty relating to whether the CHP elements of the Proposed Development would be implemented.
4.10.11	14.7.1	Assumptions	The Scoping Report has assumed that construction workers requiring accommodation would be accommodated within the existing visitor/private rented accommodation sector. The ES should assess any likely significant effects to this sector.

Major Accidents and Disasters

(Scoping Report section 15)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
4.10.12	15.5.3	Major accidents and disasters – aspect as a whole	The Scoping Report considers that the effects of the Proposed Development with regards to major accidents and disasters are not expected to be significant. This is on the basis that existing measures are in place through legislation and/or best practice. The Inspectorate agrees that the measures described in the Scoping Report can be sufficient in addressing any likely significant effects. The ES should provide details of these measures and how these would be secured.
ID	**Ref**	**Other points**	**Inspectorate's comments**
4.10.13	15.4.2	Study area	The ES should explain their reasoning behind the use of a 1km study area regarding impacts from major accidents or disasters. The study area should be established according to the extent of the impacts and the potential for likely significant effects rather than pre-determined distances.
4.10.14	Appendix C Table 15.A1	Receptors	Table 15.A1 states that there are no residential receptors within the Red Line Boundary (RLB). This differs from what is shown in Figure 1.1 Red Line Boundary. There are also sections of the Table which have not been populated. Any comparable table provided within the ES should be updated to address these errors.

5. INFORMATION SOURCES

5.0.1 The Inspectorate's National Infrastructure Planning website includes links to a range of advice regarding the making of applications and environmental procedures, these include:

- Pre-application prospectus[3]
- Planning Inspectorate advice notes[4]:
  - Advice Note Three: EIA Notification and Consultation;
  - Advice Note Four: Section 52: Obtaining information about interests in land (Planning Act 2008);
  - Advice Note Five: Section 53: Rights of Entry (Planning Act 2008);
  - Advice Note Seven: Environmental Impact Assessment: Process, Preliminary Environmental Information and Environmental Statements;
  - Advice Note Nine: Using the 'Rochdale Envelope';
  - Advice Note Ten: Habitat Regulations Assessment relevant to nationally significant infrastructure projects (includes discussion of Evidence Plan process);
  - Advice Note Twelve: Transboundary Impacts;
  - Advice Note Seventeen: Cumulative Effects Assessment; and
  - Advice Note Eighteen: The Water Framework Directive.

5.0.2 Applicants are also advised to review the list of information required to be submitted within an application for Development as set out in The Infrastructure Planning (Applications: Prescribed Forms and Procedures) Regulations 2009.

[3] The Planning Inspectorate's pre-application services for applicants. Available from: https://infrastructure.planninginspectorate.gov.uk/application-process/pre-application-service-for-applicants/

[4] The Planning Inspectorate's series of advice notes in relation to the Planning Act 2008 process. Available from: https://infrastructure.planninginspectorate.gov.uk/legislation-and-advice/advice-notes/

APPENDIX 1: CONSULTATION BODIES FORMALLY CONSULTED

TABLE A1: PRESCRIBED CONSULTATION BODIES[5]

SCHEDULE 1 DESCRIPTION	ORGANISATION
The Health and Safety Executive	Health and Safety Executive
The National Health Service Commissioning Board	NHS England
The relevant Clinical Commissioning Group	NHS West Norfolk Clinical Commissioning Group
	NHS Cambridgeshire and Peterborough Clinical Commissioning Group
Natural England	Natural England
The Historic Buildings and Monuments Commission for England	Historic England
The relevant fire and rescue authority	Norfolk Fire and Rescue Service
	Cambridgeshire Fire and Rescue Service
The relevant police and crime commissioner	Norfolk Police and Crime Commissioner
	Cambridgeshire Police and Crime Commissioner
The relevant parish council(s) or, where the application relates to land [in] Wales or Scotland, the relevant community council	Emneth Parish Council
	Marshland St. James Parish Council
	Walsoken Parish Council
	West Walton Parish Council
	Walpole Parish Council
	Elm Parish Council
	Wisbech Town Council

[5] Schedule 1 of The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 (the 'APFP Regulations')

SCHEDULE 1 DESCRIPTION	ORGANISATION
The Environment Agency	The Environment Agency
The Maritime and Coastguard Agency	Maritime & Coastguard Agency
The Marine Management Organisation	Marine Management Organisation
The Relevant Highways Authority	Cambridgeshire County Council Highways
	Norfolk County Council Highways
The relevant strategic highways company	Highways England
The relevant internal drainage board	Whittlesey and District Internal Drainage Board
	Downham Market Internal Drainage Boards
	King's Lynn Internal Drainage Board
	Ely Group of Internal Drainage Boards
	Middle Level Commissioners
Public Health England, an executive agency of the Department of Health	Public Health England
The Crown Estate Commissioners	The Crown Estate
The Forestry Commission	Forestry Commission
The Secretary of State for Defence	Ministry of Defence

TABLE A2: RELEVANT STATUTORY UNDERTAKERS[6]

STATUTORY UNDERTAKER	ORGANISATION
The relevant Clinical Commissioning Group	NHS West Norfolk Clinical Commissioning Group
	NHS Cambridgeshire and Peterborough Clinical

[6] 'Statutory Undertaker' is defined in the APFP Regulations as having the same meaning as in Section 127 of the Planning Act 2008 (PA2008)

STATUTORY UNDERTAKER	ORGANISATION
	Commissioning Group
The National Health Service Commissioning Board	NHS England
The relevant NHS Trust	East of England Ambulance Service NHS Trust
The relevant NHS Foundation Trust	Cambridgeshire and Peterborough NHS Foundation Trust
Railways	Highways England Historical Railways Estate
Canal Or Inland Navigation Authorities	Environment Agency
Dock and Harbour authority	Wisbech Harbour Authority
Civil Aviation Authority	Civil Aviation Authority
Licence Holder (Chapter 1 Of Part 1 Of Transport Act 2000)	NATS En-Route Safeguarding
Universal Service Provider	Royal Mail Group
Homes and Communities Agency	Homes England
The relevant Environment Agency	The Environment Agency
The relevant water and sewage undertaker	Anglian Water
The relevant public gas transporter	Cadent Gas Limited
	Energetics Gas Limited
	Energy Assets Pipelines Limited
	ES Pipelines Ltd
	ESP Connections Ltd
	ESP Networks Ltd
	ESP Pipelines Ltd
	Fulcrum Pipelines Limited
	Harlaxton Gas Networks Limited
	GTC Pipelines Limited

STATUTORY UNDERTAKER	ORGANISATION
	Independent Pipelines Limited
	Indigo Pipelines Limited
	Murphy Gas Networks limited
	Quadrant Pipelines Limited
	National Grid Gas Plc
	Scotland Gas Networks Plc
	Southern Gas Networks Plc
Electricity Generators With CPO Powers	Sutton Bridge Power Generation
The relevant electricity distributor with CPO Powers	Eclipse Power Network Limited
	Energetics Electricity Limited
	Energy Assets Networks Limited
	ESP Electricity Limited
	Fulcrum Electricity Assets Limited
	Harlaxton Energy Networks Limited
	Independent Power Networks Limited
	Leep Electricity Networks Limited
	Murphy Power Distribution Limited
	The Electricity Network Company Limited
	UK Power Distribution Limited
	Utility Assets Limited
	Vattenfall Networks Limited
	UK Power Networks Limited
The relevant electricity transmitter with CPO Powers	National Grid Electricity Transmission Plc

TABLE A3: SECTION 43 CONSULTEES (FOR THE PURPOSES OF SECTION 42(1)(B))[7]

LOCAL AUTHORITY[8]
Fenland District Council
King's Lynn and West Norfolk Borough Council
East Cambridgeshire District Council
Huntingdonshire District Council
South Holland District Council
Breckland Council
North Norfolk District Council
West Suffolk Council
Peterborough City Council
The Broads Authority
Bedford Borough Council
Central Bedfordshire Council
Lincolnshire County Council
Northamptonshire County Council
Essex County Council
Hertfordshire County Council
Suffolk County Council
Cambridgeshire County Council
Norfolk County Council

7 Sections 43 and 42(B) of the PA2008

8 As defined in Section 43(3) of the PA2008

APPENDIX 2: RESPONDENTS TO CONSULTATION AND COPIES OF REPLIES

CONSULTATION BODIES WHO REPLIED BY THE STATUTORY DEADLINE:
Anglian Water
Broad's Authority
Cadent Gas Limited
Cambridgeshire County Council
Cambridgeshire Police and Crime Commissioner
East Cambridgeshire District Council
Environment Agency
ESP Utilities Group Ltd
Fenland District Council
Forestry Commission
Fulcrum Pipelines
Harlaxton Energy Networks Ltd
Harlaxton Gas Networks Ltd
Health and Safety Executive
Highways England
Marine Management Organisation
Maritime and Coastguard Agency
Marshland St James Parish Council
Middle Level Commissioners
Ministry of Defence
National Grid
NATS Safeguarding

Natural England
Norfolk County Council
North Norfolk District Council
Public Health England
Royal Mail
Suffolk County Council
Walpole Parish Council
West Suffolk Council
West Walton Parish Council
Wisbech Town Council

Strategic Growth and Public Policy
Anglian Water Services Ltd
Thorpe Wood House,
Thorpe Wood,
Peterborough
PE3 6WT

[redacted]

Your ref EN010110-000004

Karen Wilkinson
EIA and Land Rights Advisor
The Planning Inspectorate
Major Casework Directorate
Temple Quay House
2 The Square
Bristol, BS1 6PN

3 January 2020

Dear Ms Wilkinson,

Medworth Energy from Waste Combined Heat and Power Facility: Environmental Statement Scoping Report

Thank you for the opportunity to comment on the scoping report for the above project. Anglian Water is the water and sewerage undertaker for the above site. The following response is submitted on behalf of Anglian Water.

General comments

Anglian Water would welcome further discussions with MVV Environment Ltd prior to the submission of the Draft DCO for examination.

In particular it would be helpful if we could discuss the following issues:

- Wording of the Draft DCO including protective provisions specifically for the benefit of Anglian Water.
- Requirement for water and wastewater services.
- Impact of development on Anglian Water's assets including water supply network and the need for mitigation.
- Pre-construction surveys.

THE QUEEN'S AWARDS FOR ENTERPRISE: SUSTAINABLE DEVELOPMENT 2015

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

an AWG Company

2 Description of proposed development

There are a number of references made to connections to the mains water supply and the foul sewerage network in the Scoping Report. We would welcome further discussion with MVV Environment Ltd in relation to the water and wastewater requirements for the site both as part of construction and operational phases.

The scoping report refers to the presence of utilities within the study area in the vicinity of the proposed development. However the report does not refer to Anglian Water's existing infrastructure.

It is therefore suggested that the Environmental Statement should include reference to existing water supply and sewerage networks where relevant.

Maps of Anglian Water's assets are available to view at the following address:

[redacted]

11 Hydrology

Reference is made to potential risk of sewer flooding arising from additional foul flows from the proposed development entering the public sewerage network including. Anglian Water is responsible for managing the risks of flooding from surface water, foul water or combined water sewer systems.

The scoping report states that any water from sewer flooding would be intercepted by local drainage ditch networks. However Anglian Water as sewerage undertaker would wish to ensure that proposed Combined Heat and Power facility does not give rise to detriment to our customers or pollutes the water environment.

Consideration should be given to all potential sources of flooding including sewer flooding as part of the Environmental Statement and related Flood Risk Assessment (FRA).We understand that there is expected to be a requirement for a connection to the public sewerage network as set out in the Scoping Report. It is suggested that the Environmental Statement and related Flood Risk Assessment should include reference to the foul sewerage network and sewage treatment.

Anglian Water would welcome further discussion with MVV Environment Ltd Ltd in relation to the foul drainage strategy for the above project prior to submission of the application to the Planning Inspectorate.

12. Geology, Hydrogeology and Contaminated Land

Reference is made to potential for the contamination of soils during construction phase and a risk to consumers of drinking water.

It is important to ensure that adequate safeguards are put in place to ensure that the proposed combined heat and power facility does not adversely affect the continued operation of Anglian Water's existing water supply infrastructure and assets.

We would therefore advise that a specific risk assessment for the water mains supply network from contaminants should be undertaken by the applicant with the assistance of Anglian Water as water undertaker.

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

Yours sincerely

Stewart Patience

Spatial Planning Manager

Broads Authority

Yare House 62 - 64 Thorpe Road
Norwich Norfolk NR1 1RY

[redacted]

Ms Cally Smith
Head of Planning
[redacted]

Karen Wilkinson
EIA and Land Rights Advisor
On behalf of the Secretary of State
The Planning Inspectorate
Major Casework Directorate
Temple Quay House
2 The Square
Bristol
BS1 6PN

Date 10 December 2019 Our ref BA/2019/0430/SCOCON Your ref EN010110-000004

Dear Karen Wilkinson

Application No : BA/2019/0430/SCOCON
Proposal : 28 day scoping opinion on development consent for Medworth Energy from Waste Combined Heat and Power Facility
Address : Medworth Energy From Waste Combined Heat And Power Facility,
Applicant : MVV Environment Ltd

I write further to the above proposal. I can confirm that the Broads Authority does not have any comments to make regarding this consultation.

Yours sincerely

[redacted]

Ms Cally Smith
Head of Planning

Date: 16 December 2019

Address

Submitted via email to: Medworth@planninginspectorate.gov.uk

Cadent Gas Limited
Ashbrook Court, Prologis Park
Central Boulevard
Coventry CV7 8PE
[redacted]

Cadent
Your Gas Network

REF: DCO - MEDWORTH ENERGY FROM WASTE COMBINED HEAT AND POWER FACILITY

I refer to your email dated 5th December 2019 regarding the above proposed DCO and your current consultation.

Cadent Gas Limited ("Cadent") has not been engaged with the Medworth Energy project team to discuss possible interactions and impacts to Cadent apparatus.

In respect of existing Cadent infrastructure, Cadent will require appropriate protection, assurance or relocation of retained apparatus including compliance with relevant standards for works which may be proposed within close proximity of its apparatus.

Cadent has identified the following apparatus within the vicinity of the proposed works:

- High pressure (above 2 bar) gas pipelines and associated above ground and below ground equipment
- Low or Medium pressure (below 2 bar) gas pipelines and associated above and below ground equipment (as a result it is highly likely that there are also gas services and associated apparatus in the vicinity, these are not shown on plans but their presence should be anticipated and investigated further)
- Above Ground Installations

Note: No liability of any kind whatsoever is accepted by Cadent Gas Limited or their agents, servants or contractors for any error or omission.

Diversions and Protection of Apparatus:

In order to assess the impact to Cadent's appraataus and network, as a minimum we need to conduct a high level impact assessment and feasilbity study of our below 7 bar and above 7 bar network associated with the Medworth Energy DCO Scheme. This work can take upwards of 12 months to undertake depending on the complexity of the scheme and therefore a meeting with the Promoter to discuss the scope and requirements is recommended at the earliest opportunity.

Cadent will provide (not limited to):

- **Drawings showing asset locations and an high level view whether the asset would be a 'Divert, Protect or Abandon'**
- **An impact assessment based on information provided by the Promoter (including Shapefiles and Design information as requested/agreed)**
- **Asset information of impacted assets, including size, material and any high level outage windows**
- **An indication of the cost of the project (desktop exercise only) and where applicable any major foreseen difficulties**

Land & Consents Requirements

Where diversions of apparatus are required to facilitate the scheme, Cadent will require the Promoter to obtain all necessary land, planning permissions and other consents to enable the diversion works to be carried out. Details of these consents should be agreed in writing with Cadent before any applications are made to ensure that they are sufficient to deliver works within the proposed timescales. Cadent would ordinarily require a minimum of Conceptual Design study to have been carried out to establish appropriate diversion routes, land and consents requirements ahead of any application being made.

The Promoter will be responsible for obtaining at their cost and granting to Cadent the necessary land rights, on Cadent's standard terms, to allow the construction, maintenance, protection and access of the diverted apparatus. As such adequate land rights must be granted to Cadent (e.g. following the exercise of compulsory powers to acquire such rights included within the DCO) to enable works to proceed, to Cadent's satisfaction. Cadent's approval to the land rights powers included in the DCO prior to submission is strongly recommended to avoid later substantive objection to the DCO. Land rights will be required to be obtained prior to construction and commissioning of any diverted apparatus, to avoid any delays to the project's timescales. A diversion agreement may be required addressing responsibility for works, timescales, expenses and indemnity.

Protection/Protective Provisions:

Where the Promoter intends to acquire land, extinguish rights, or interfere with any of Cadent's apparatus, Cadent will require appropriate protection for retained apparatus and further discussion on the impact to its apparatus and rights including adequate Protective Provisions. Operations within Cadent's existing easement strips are not permitted without approval and any proposals for work in the vicinity for Cadent's existing apparatus will require approval by Plant Protection under the Protective Provisions. Early discussions are advised.

Yours Faithfully

[redacted]

Senior Land Officer/Consents Officer
Land & Property Services

[redacted]

PLANT PROTECTION – KEY CONSIDERATIONS

- Any works relating to the Medworth Energy project that may have an impact on the Cadent Gas Network MUST be submitted to the Plant Protection team at Hinckley (plantprotection@cadentgas.com). Details can be found here [redacted] offering an on-line request, or details to contact Hinckley direct by email, post or telephone. This includes all prior Ground Investigation, pre-enabling works such as Archaeological excavations, and temporary and permanent crossings of buried pipelines. The Medworth Energy project should be aware that even though intrusive ground works may not impact on the Cadent Gas Network crossing of buried assets to these works may need to be assessed

- Written permission is required before any works commence within a Cadent easement strip and a Deed of Consent may be required if any apparatus needs to cross the Cadent easement strip

- The below guidance is not exhaustive and all works in the vicinity of Cadent's asset shall be subject to review and approval from Cadent's plant protection team in advance of commencement of works on site.

General Notes on Pipeline Safety:

- You should be aware of the Health and Safety Executives guidance document HS(G) 47 "Avoiding Danger from Underground Services", and Cadent's specification for Safe Working in the Vicinity of Cadent High Pressure gas pipelines and associated installations - requirements for third parties GD/SP/SSW22. Digsafe leaflet Excavating Safely - Avoiding injury when working near gas pipes. There will be additional requirements dictated by Cadent's plant protection team.

- Cadent will also need to ensure that all pipelines remain accessible throughout and after completion of the works

- The actual depth and position must be confirmed on site by trial hole investigation under the supervision of a Cadent representative. Ground cover above our pipelines should not be reduced or increased.

- If any excavations are planned within 3 metres of Cadent High Pressure Pipeline or, within 10 metres of an AGI (Above Ground Installation), or if any embankment or dredging works are proposed then the actual position and depth of the pipeline must be established on site in the presence of a Cadent representative. A safe working method agreed prior to any work taking place in order to minimise the risk of damage and ensure the final depth of cover does not affect the integrity of the pipeline.

- Below are some examples of work types that have specific restrictions when being undertaken in the vicinity of gas assets therefore consultation with Cadent's Plant Protection team is essential:

    - Demolition
    - Blasting
    - Piling and boring
    - Deep mining
    - Surface mineral extraction
    - Landfilling
    - Trenchless Techniques (e.g. HDD, pipe splitting, tunnelling etc.)
    - Wind turbine installation
    - Solar farm installation
    - Tree planting schemes

Pipeline Crossings:

- Where existing roads cannot be used, construction traffic should ONLY cross the pipeline at agreed locations.

- The pipeline shall be protected, at the crossing points, by temporary rafts constructed at ground level. The third party shall review ground conditions, vehicle types and crossing frequencies to determine the type and construction of the raft required.
- The type of raft shall be agreed with Cadent prior to installation.
- No protective measures including the installation of concrete slab protection shall be installed over or near to the Cadent pipeline without the prior permission of Cadent.
- Cadent will need to agree the material, the dimensions and method of installation of the proposed protective measure.
- The method of installation shall be confirmed through the submission of a formal written method statement from the contractor to Cadent.
- A Cadent representative shall monitor any works within close proximity to the pipeline.

New Service Crossing:

- New services may cross the pipeline at perpendicular angle to the pipeline i.e. 90 degrees.
- Where a new service is to cross over the pipeline a clearance distance of 0.6 metres between the crown of the pipeline and underside of the service should be maintained. If this cannot be achieved the service shall cross below the pipeline with a clearance distance of 0.6 metres.
- A new service should not be laid parallel within an easement strip
- A Cadent representative shall approve and supervise any new service crossing of a pipeline.
- An exposed pipeline should be suitable supported and removed prior to backfilling
- An exposed pipeline should be protected by matting and suitable timber cladding
- For pipe construction involving deep excavation (<1.5m) in the vicinity of grey iron mains, the model consultative procedure will apply therefore an integrity assessment must be conducted to confirm if diversion is required

Guidance

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

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

Dial Before You Dig Pipelines Guidance:

[redacted]

Essential Guidance document:

[redacted]

Excavating Safely in the vicinity of gas pipes guidance (Credit card):

[redacted]

Copies of all the Guidance Documents can also be downloaded from the Cadent website:

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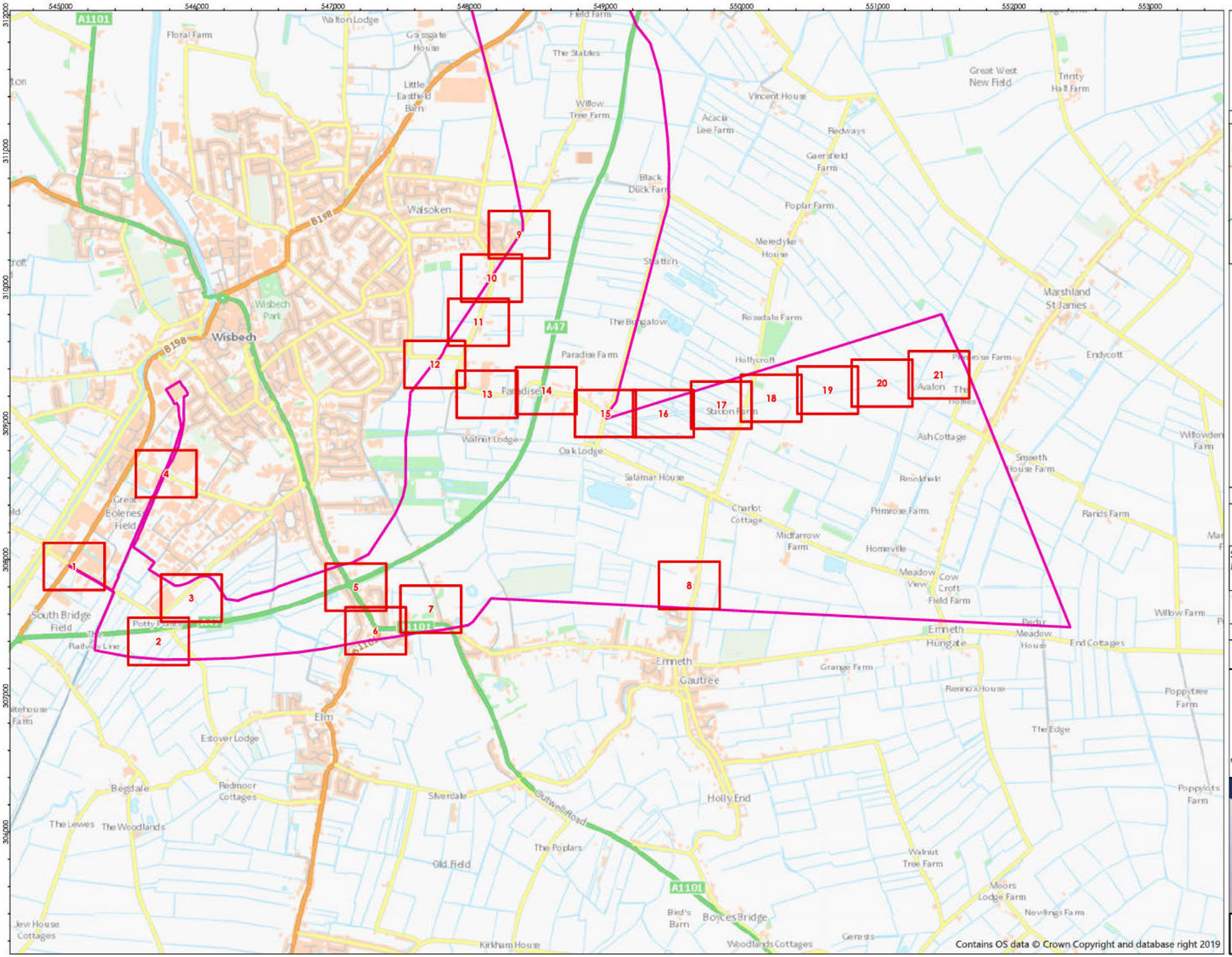
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Grassgate House
Little Eastfield Barn
Field Farm
The Stables
Willow Tree Farm
Great West New Field
Trinity Hall Farm
Vincent House
Acacia Lee Farm
Redways
Gaerstield Farm
Black Duck Farm
Poplar Farm
Meredyke House
Walsoken
Wisbech Park
Wisbech
Stratton
The Bungalow
Rosedale Farm
Marshland St James
Paradise Farm
Hollycroft
Primrose Farm
Endycott
Avalon
Paradise
Station Farm
Walnut Lodge
Oak Lodge
Ash Cottage
Willowden Farm
Smeeth House Farm
Salamar House
Brookfield
Great Boleness Field
Charlot Cottage
Primrose Farm
Rands Farm
Midfarrow Farm
Homeville
Meadow View
Cow Croft
Field Farm
South Bridge Field
Potty Plantation
Railway Line
Emneth Hungate
Raidy Meadow House
End Cottages
Willow Farm
Emneth
Gautree
Grange Farm
Rennox House
Poppytree Farm
The Edge
Elm
Estover Lodge
Redmoor Cottages
Begdale
Silverdale
Outwell Road
Holly End
The Lewes
The Woodlands
The Poplars
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Moors Lodge Farm
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Poppylots Farm
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Medworth Energy
TITLE:
DCO Overview Plan
FP: 105118-359
SCALE: 1:25,000 @ A3
DATE: 06/12/2019
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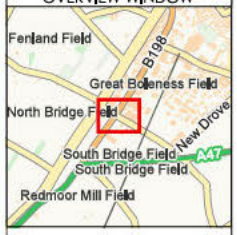

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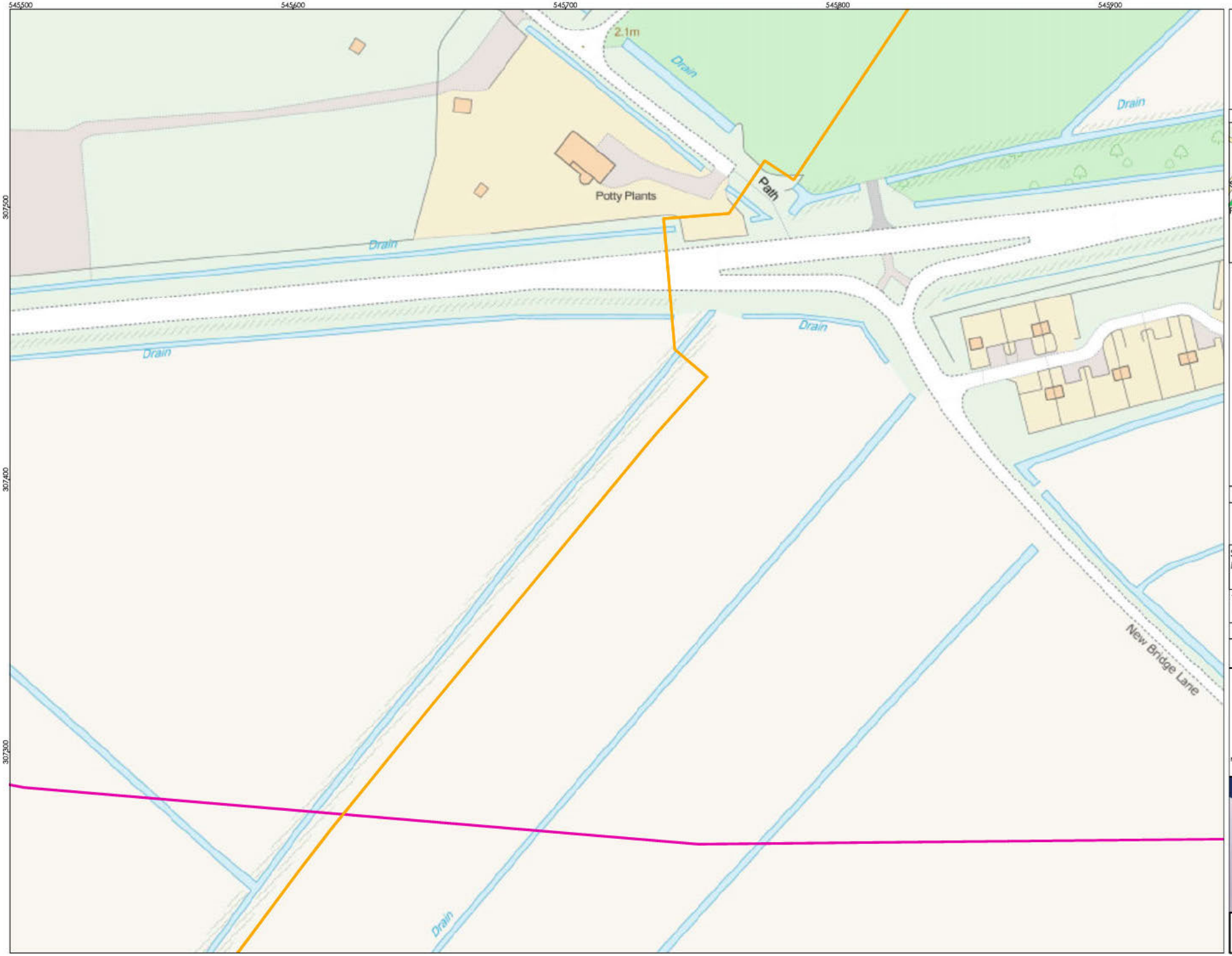

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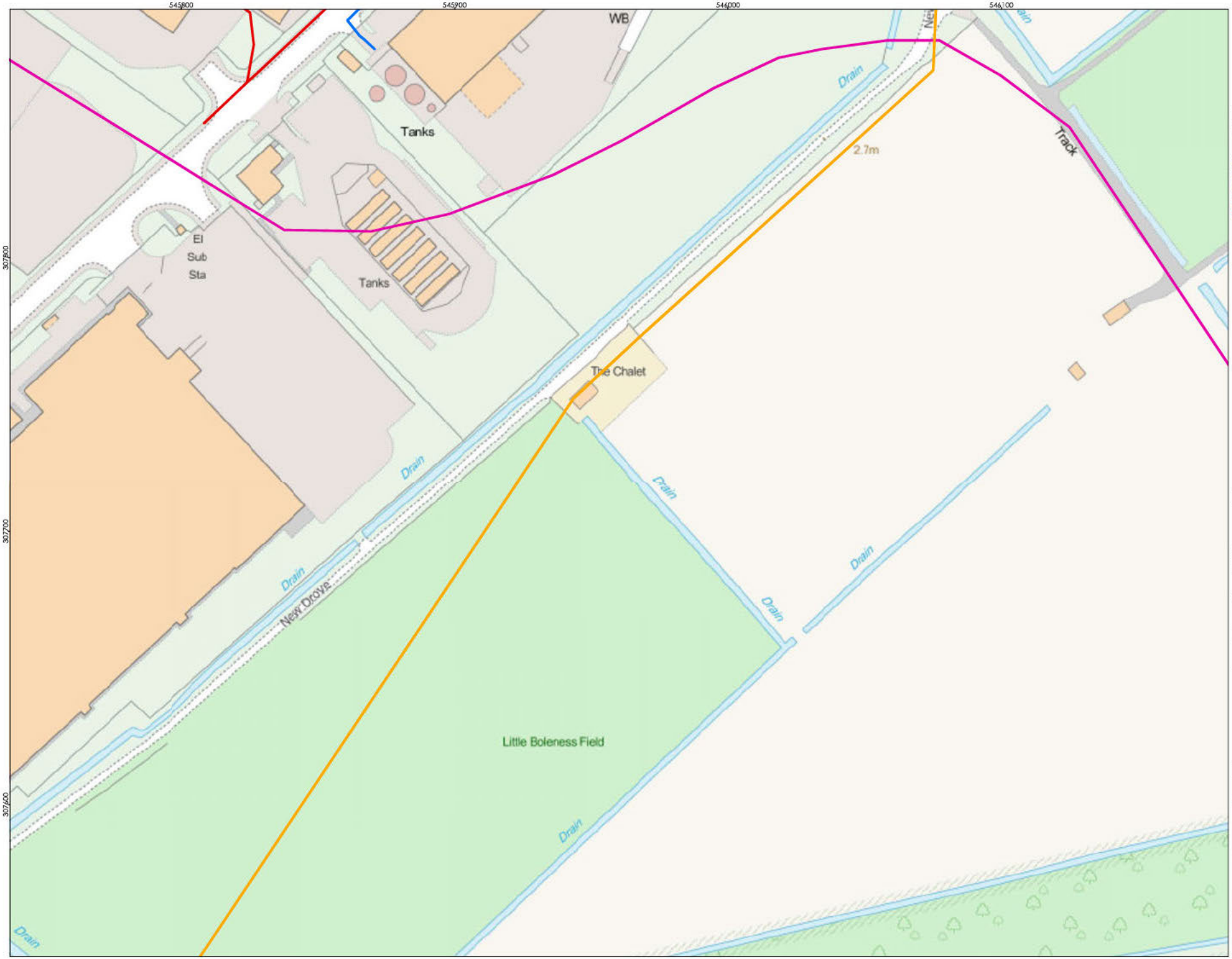

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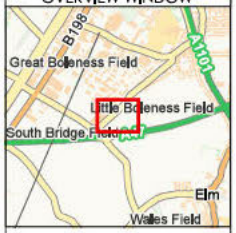

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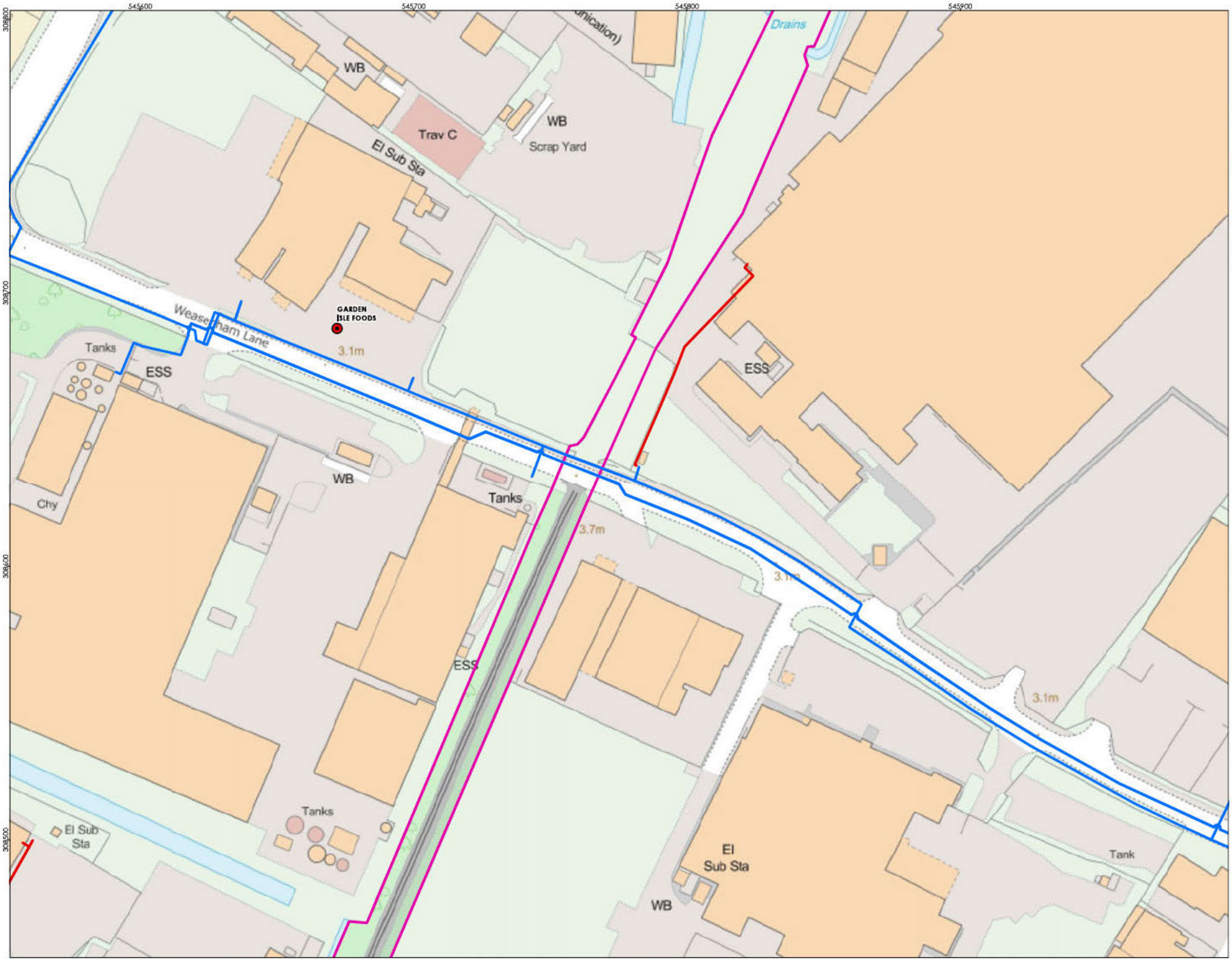

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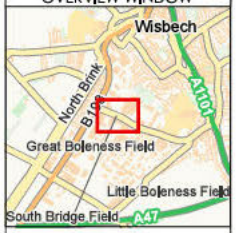

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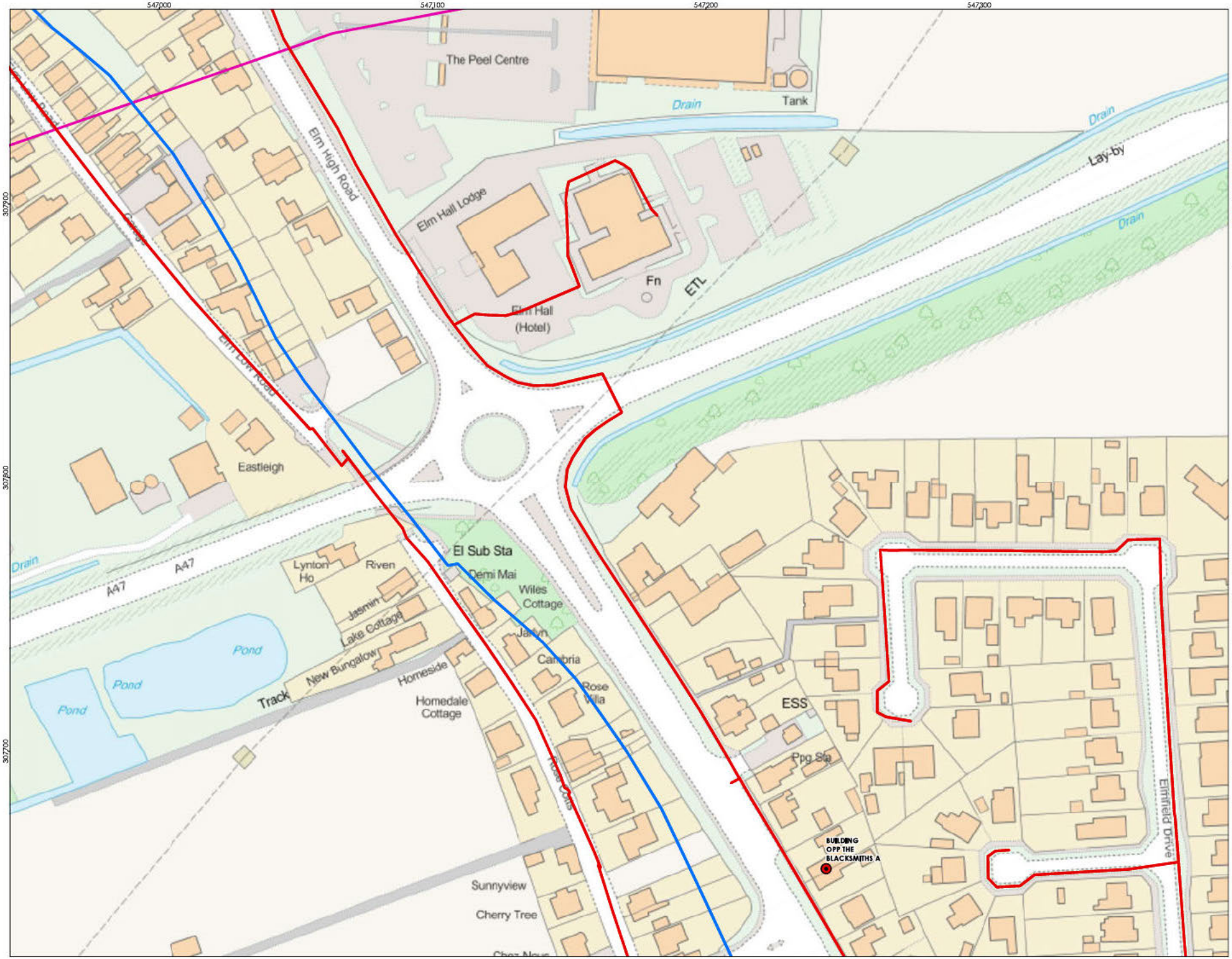

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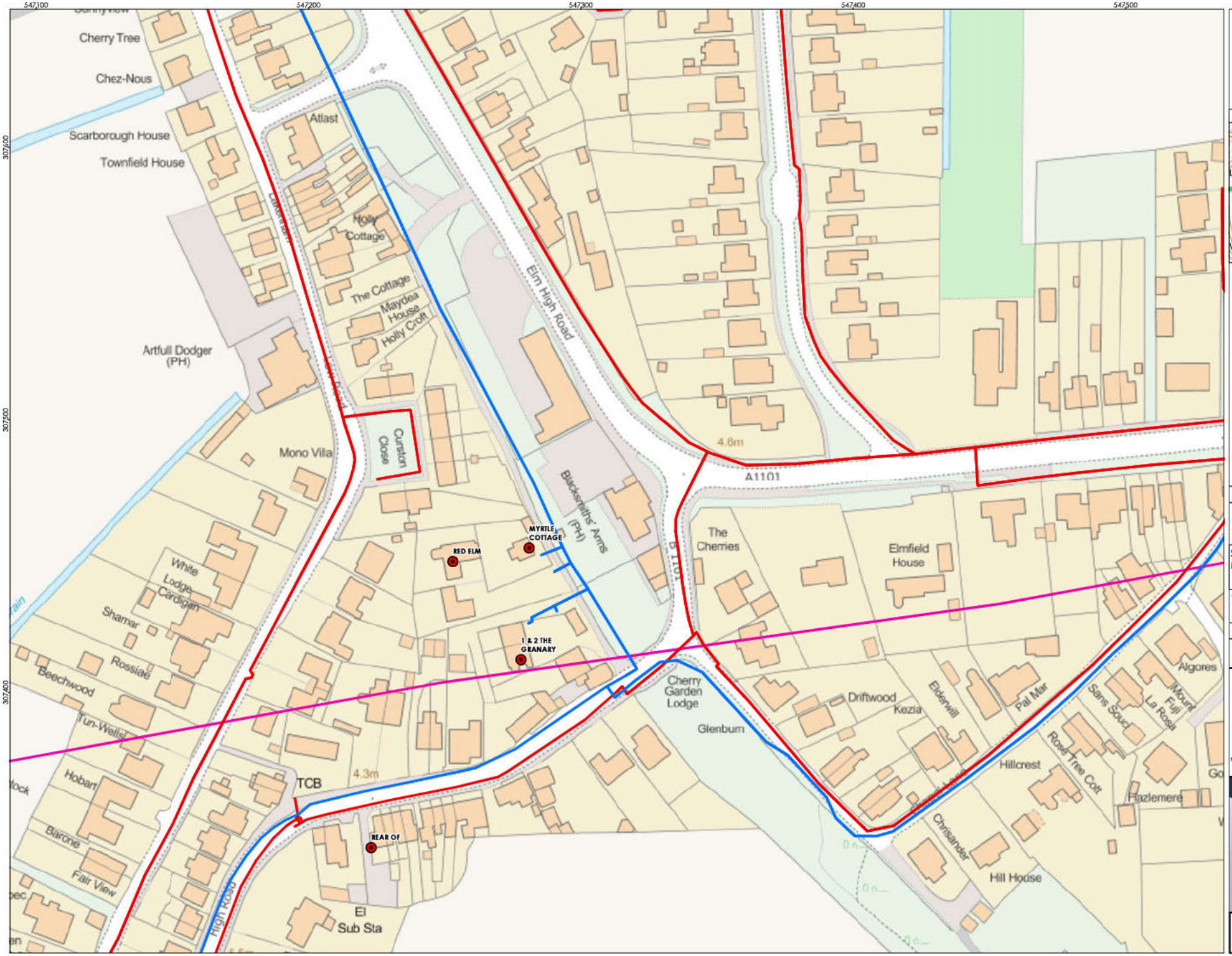

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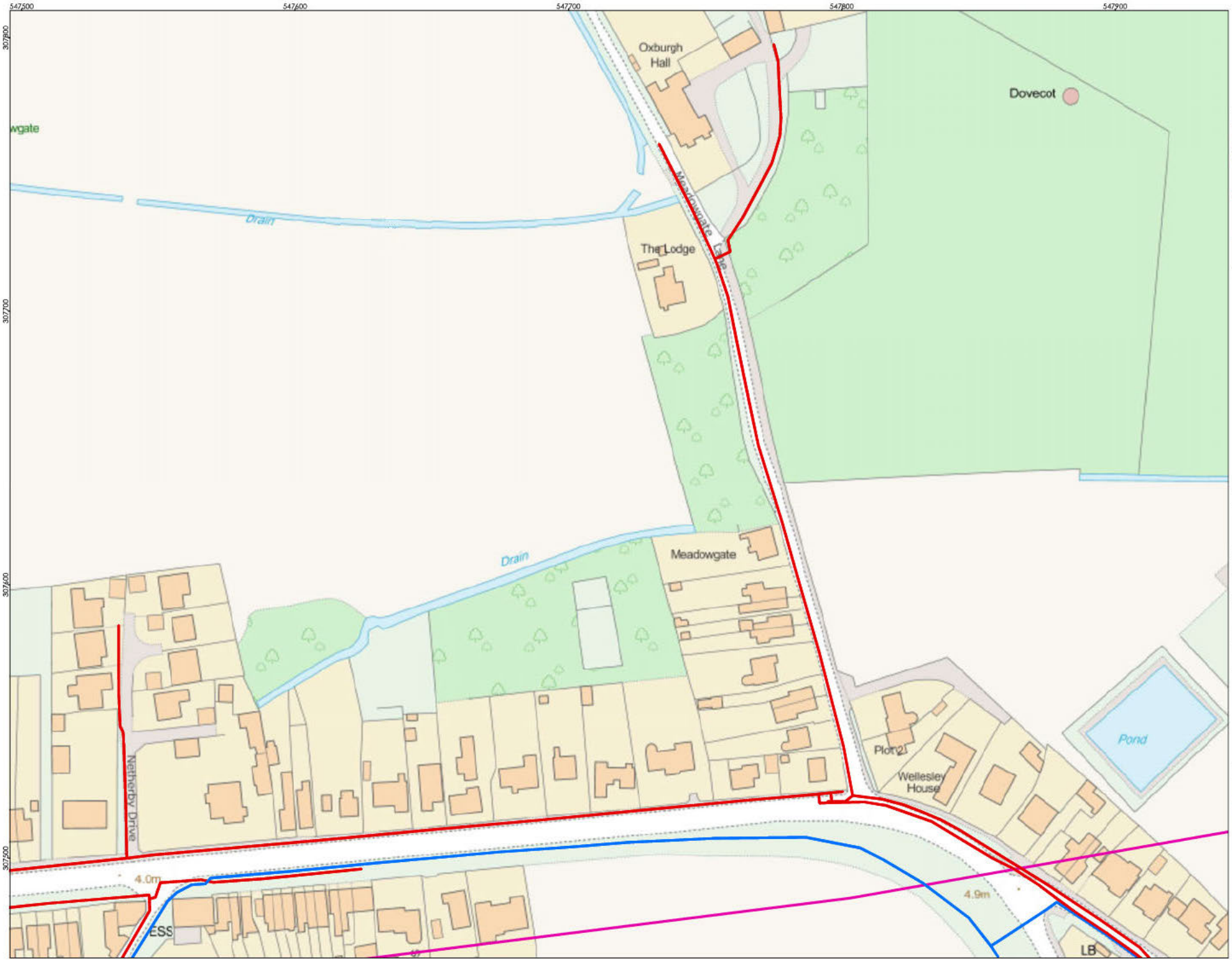

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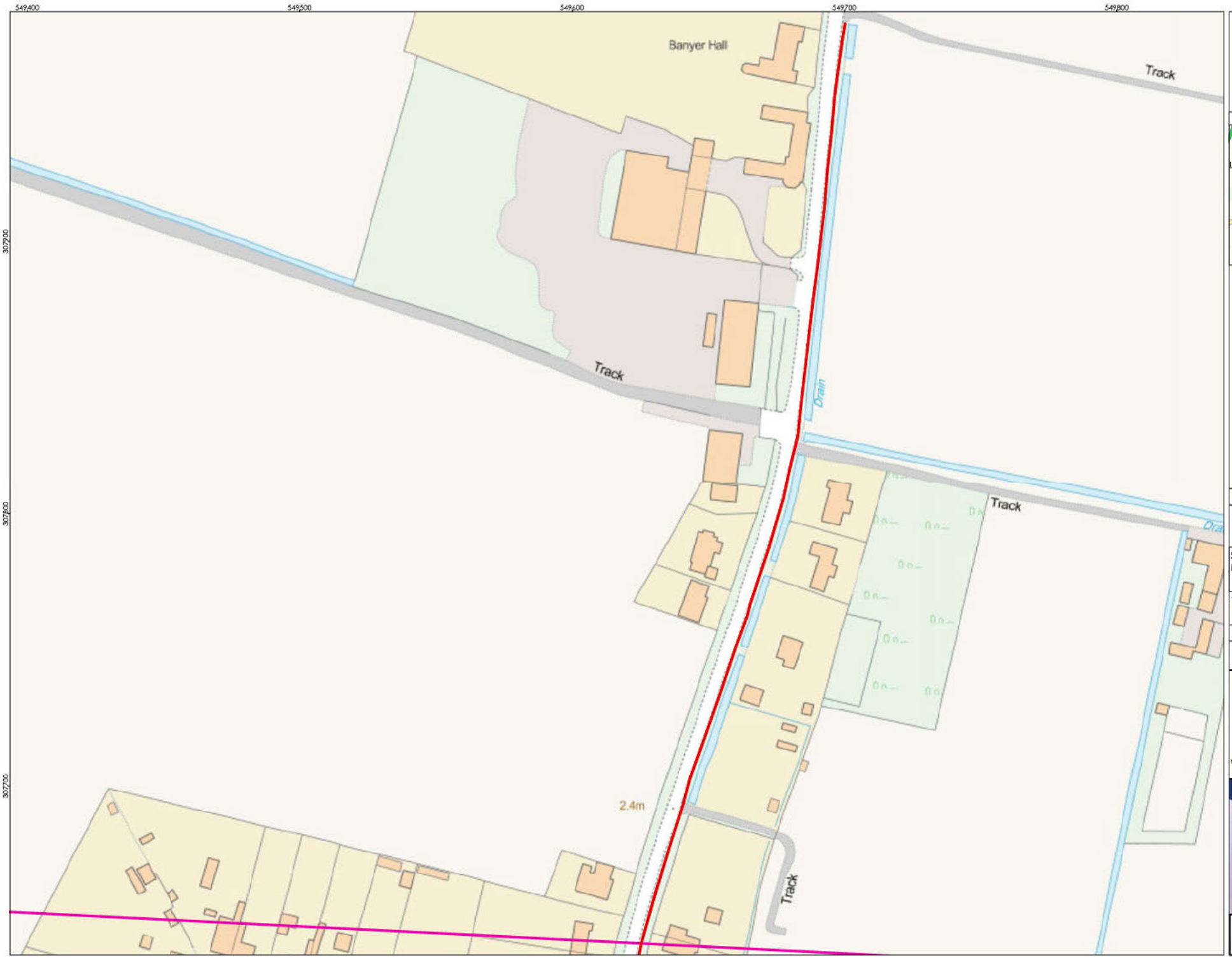

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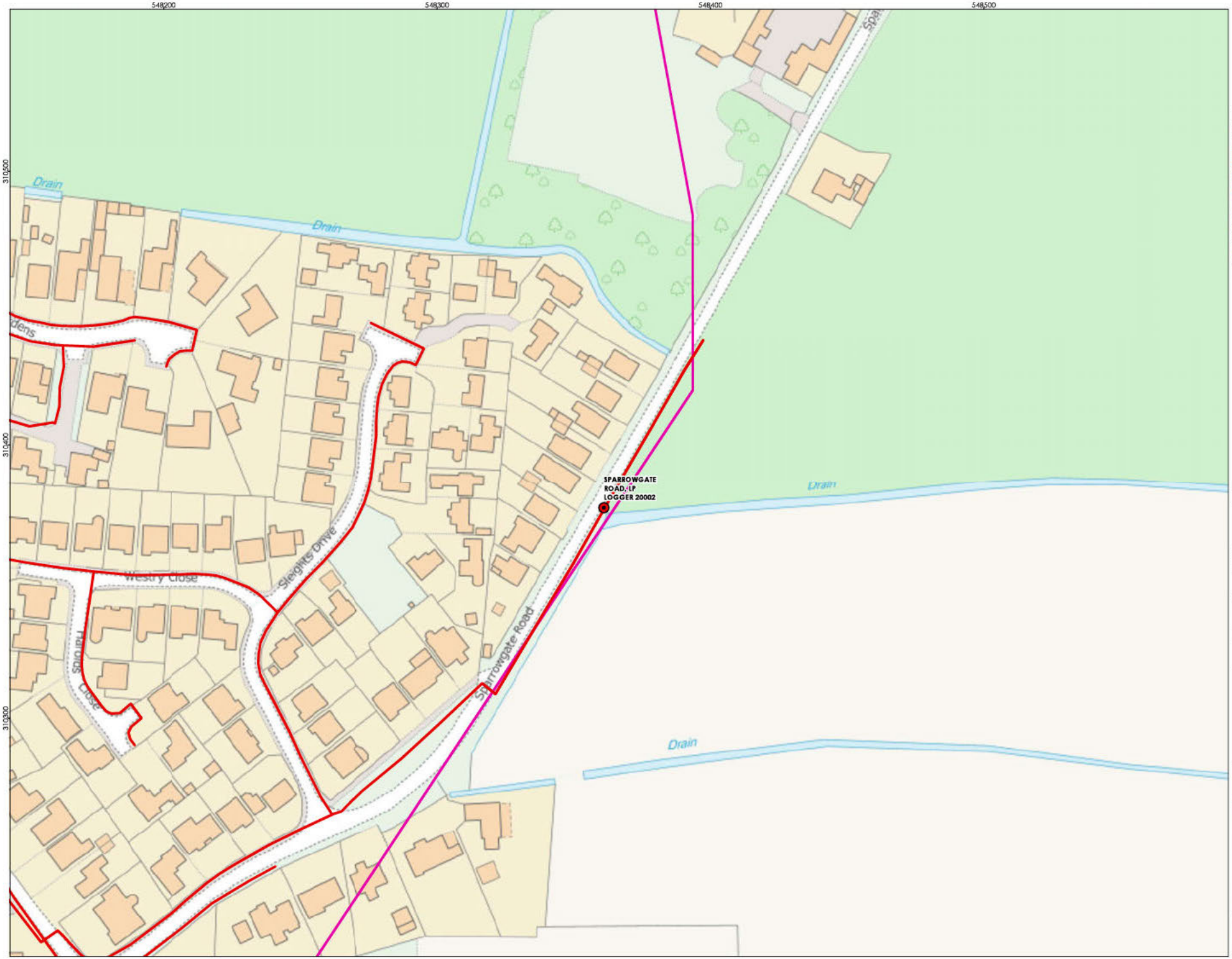

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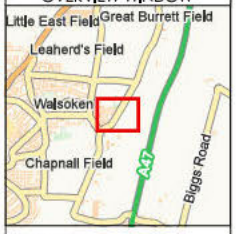

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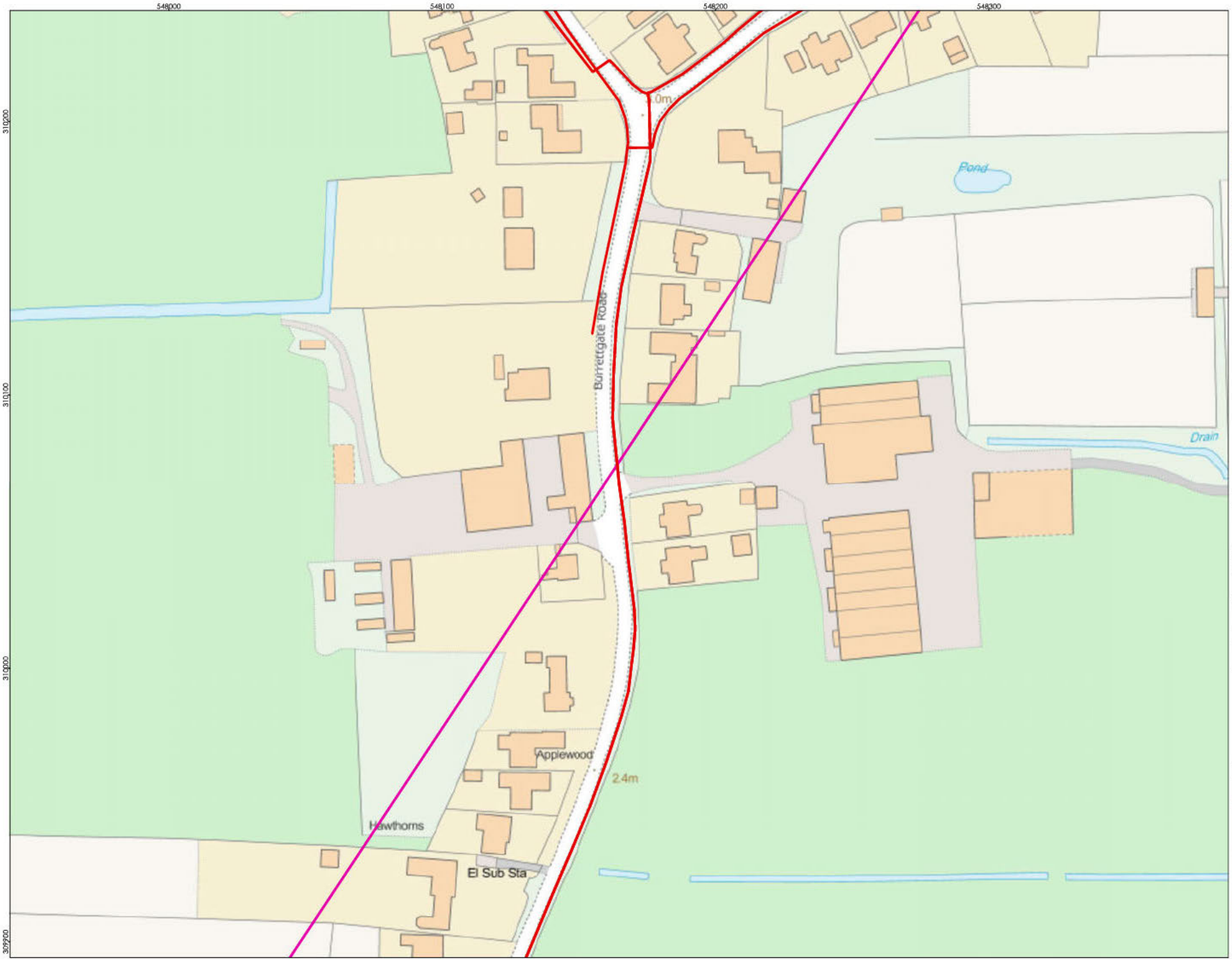

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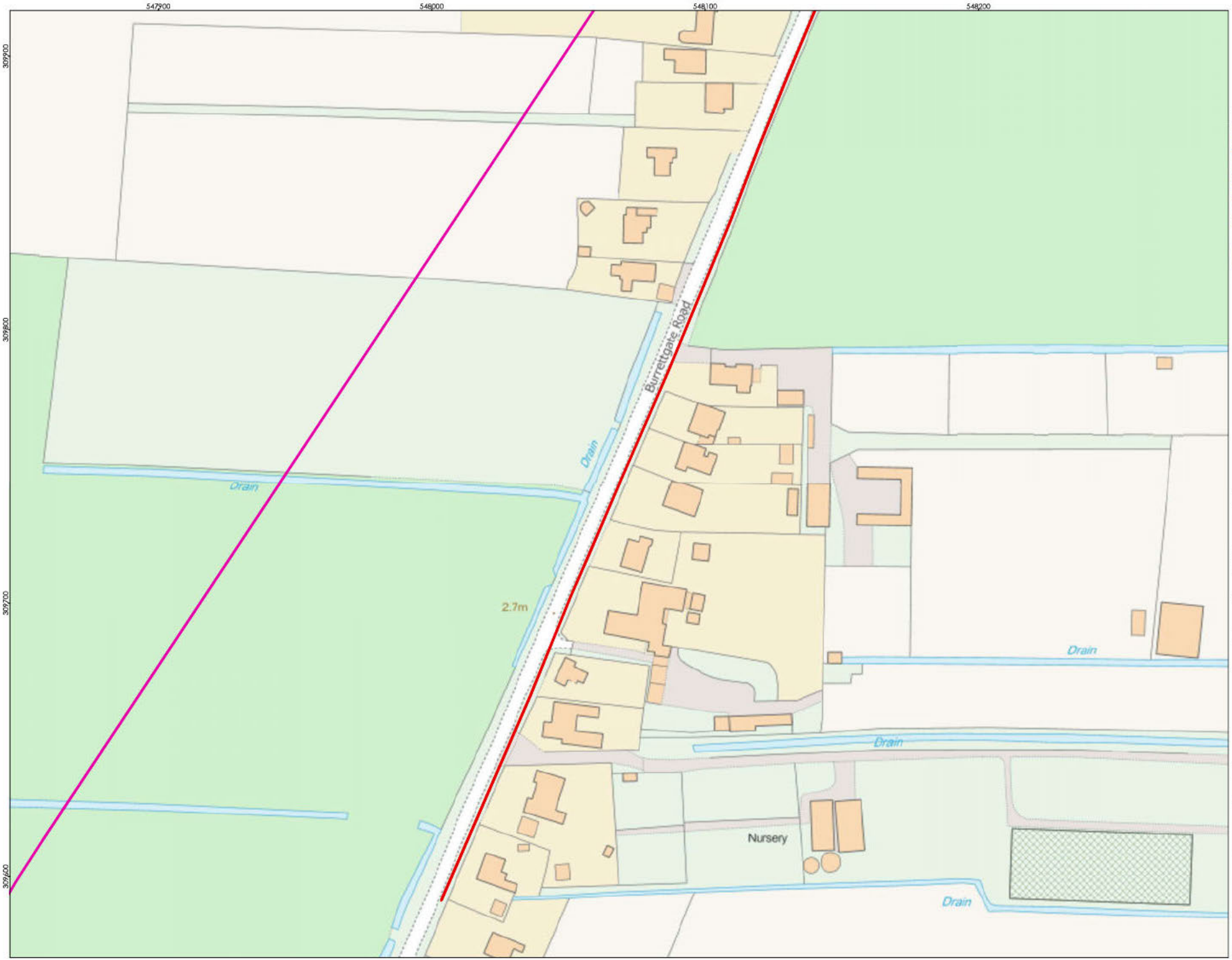

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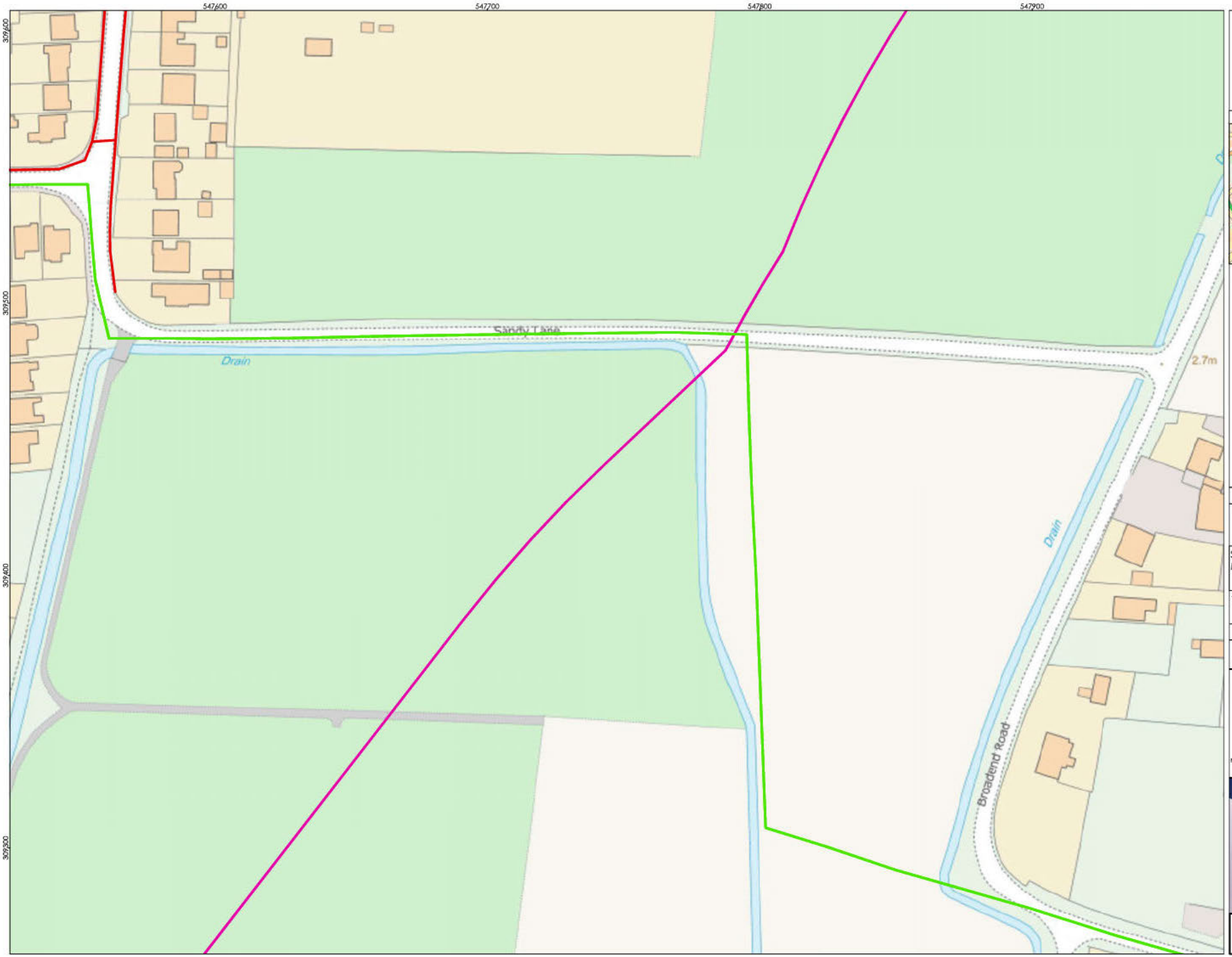

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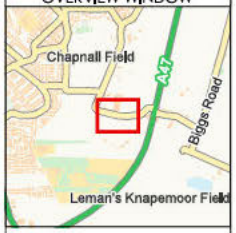

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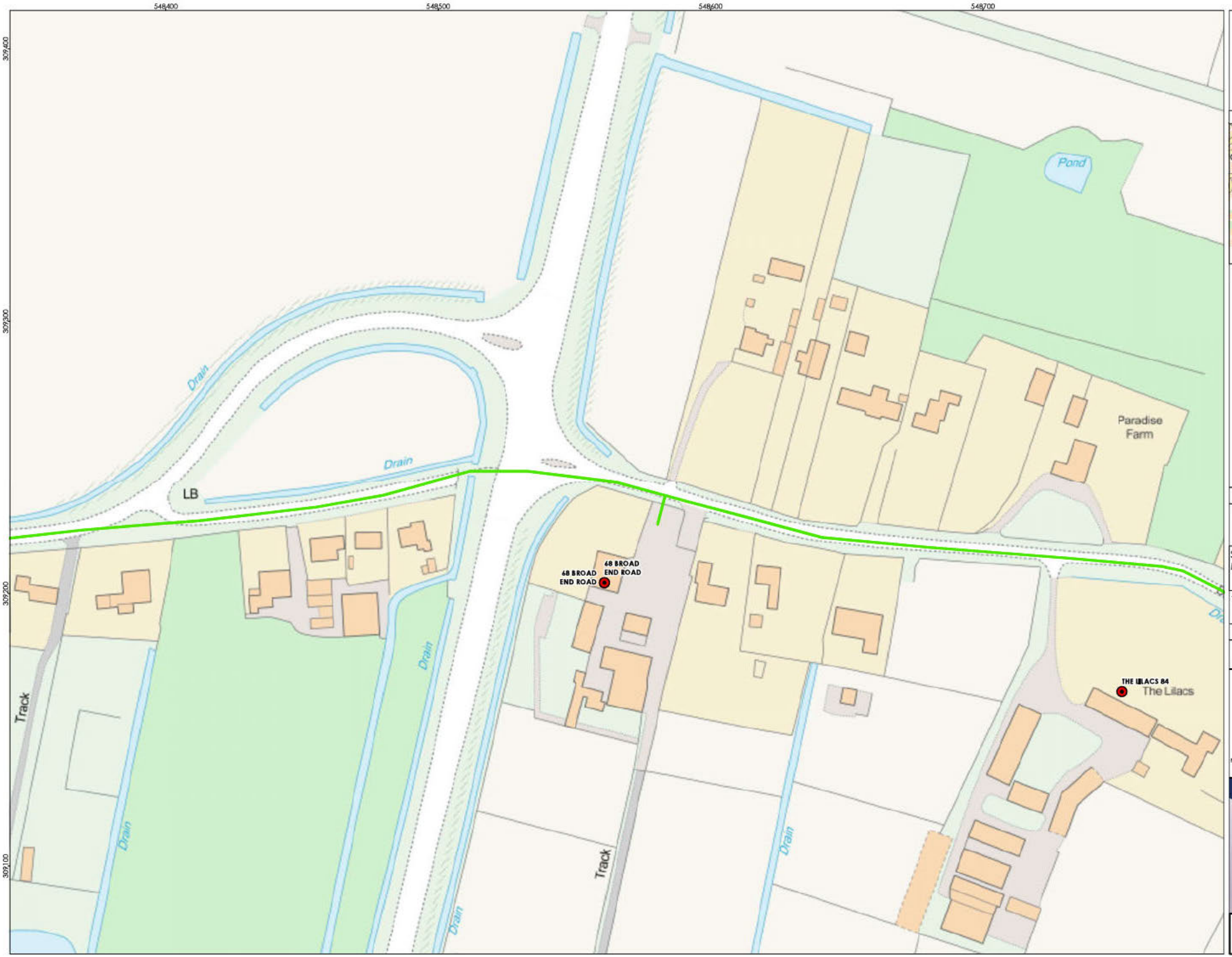

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DATE: 06/12/2019

FISHER GERMAN

The Estates Office, Norman Court
Ashby de la Zouch,
Leicestershire, LE65 2UZ

[redacted]

DRAWING REF:
Cadent-2019-12-RW-INT-Medworth Energy

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CLIENT: Cadent – Your Gas Network

SCHEME:
Medworth Energy

TITLE:
DCO Interaction Plan

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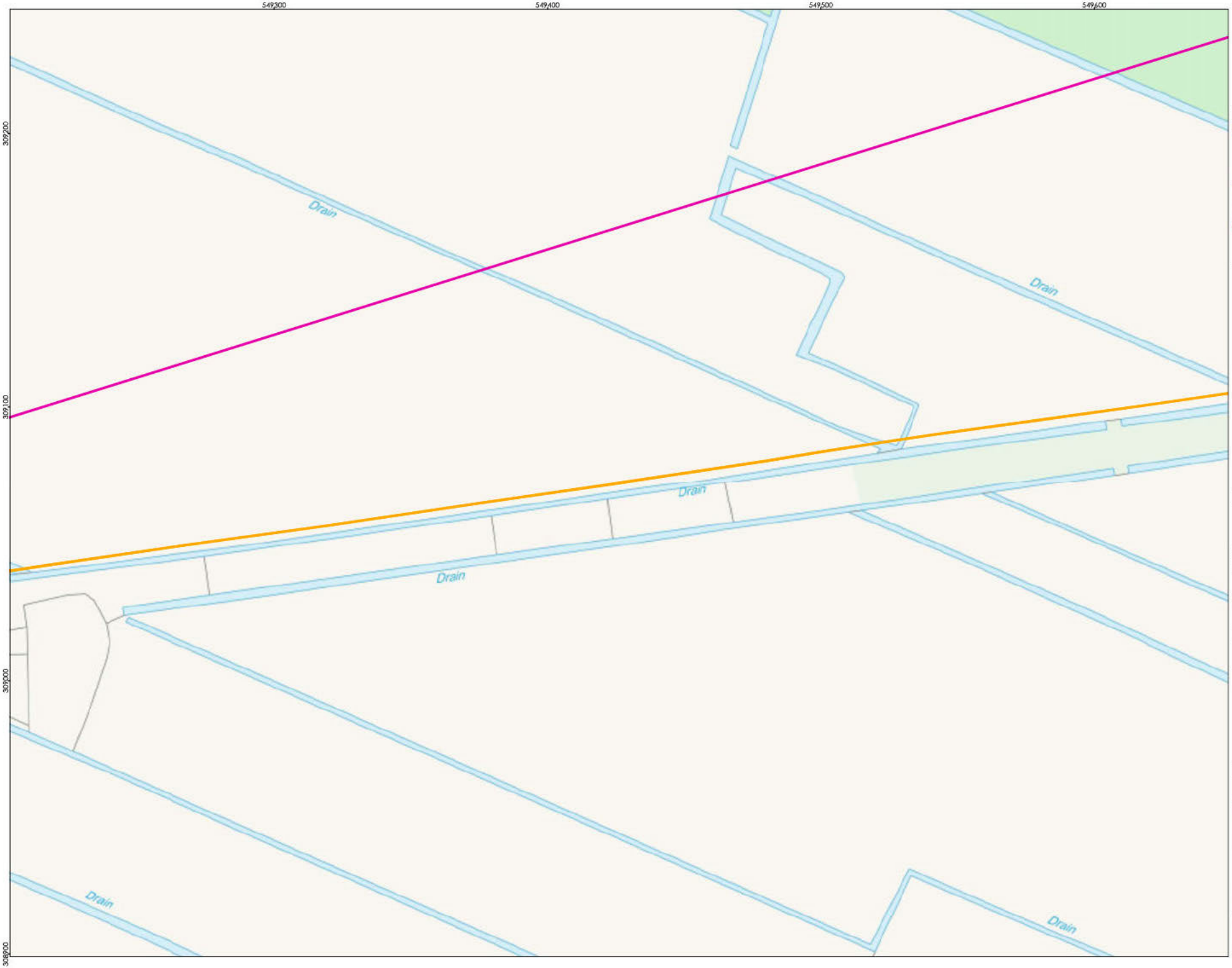

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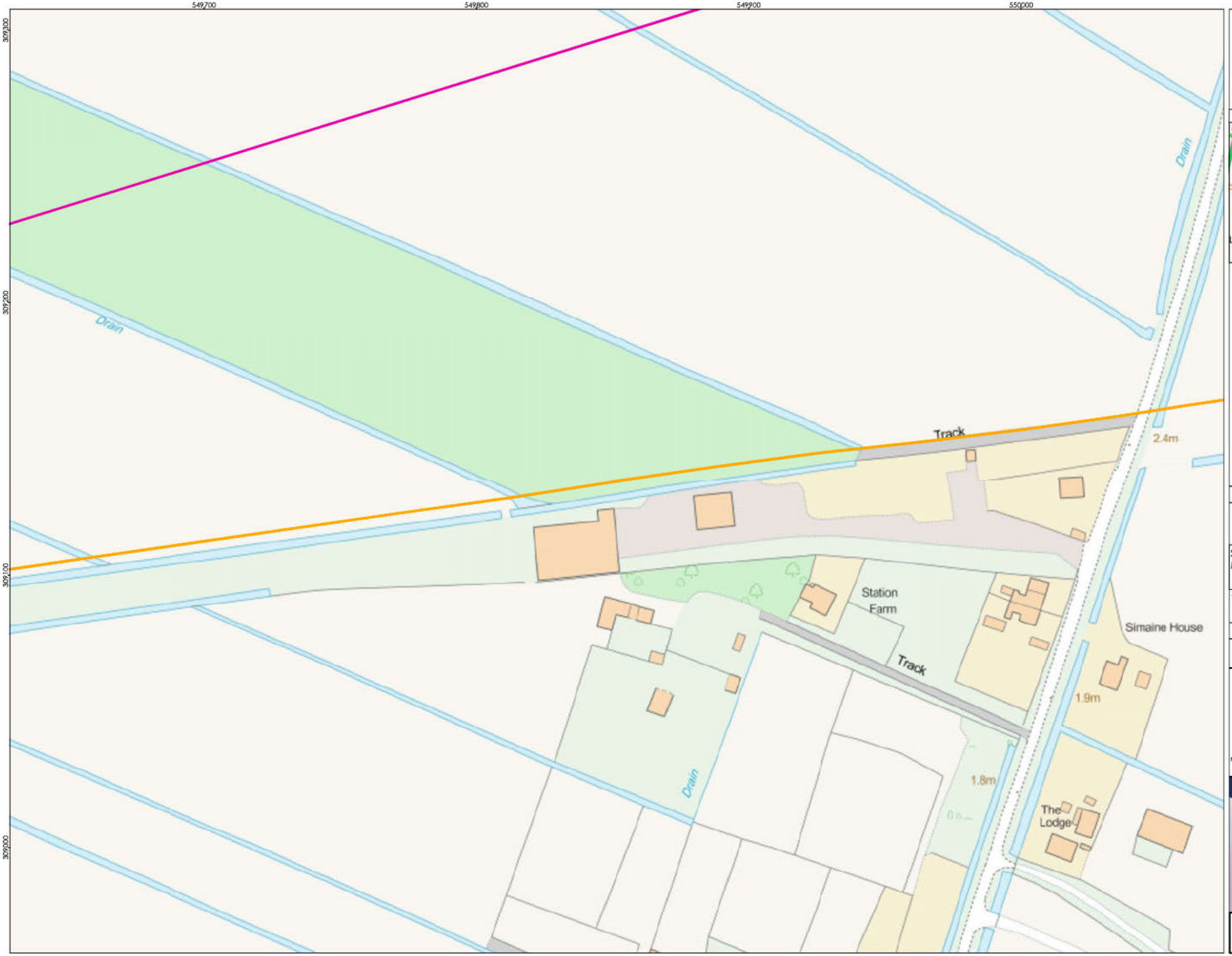

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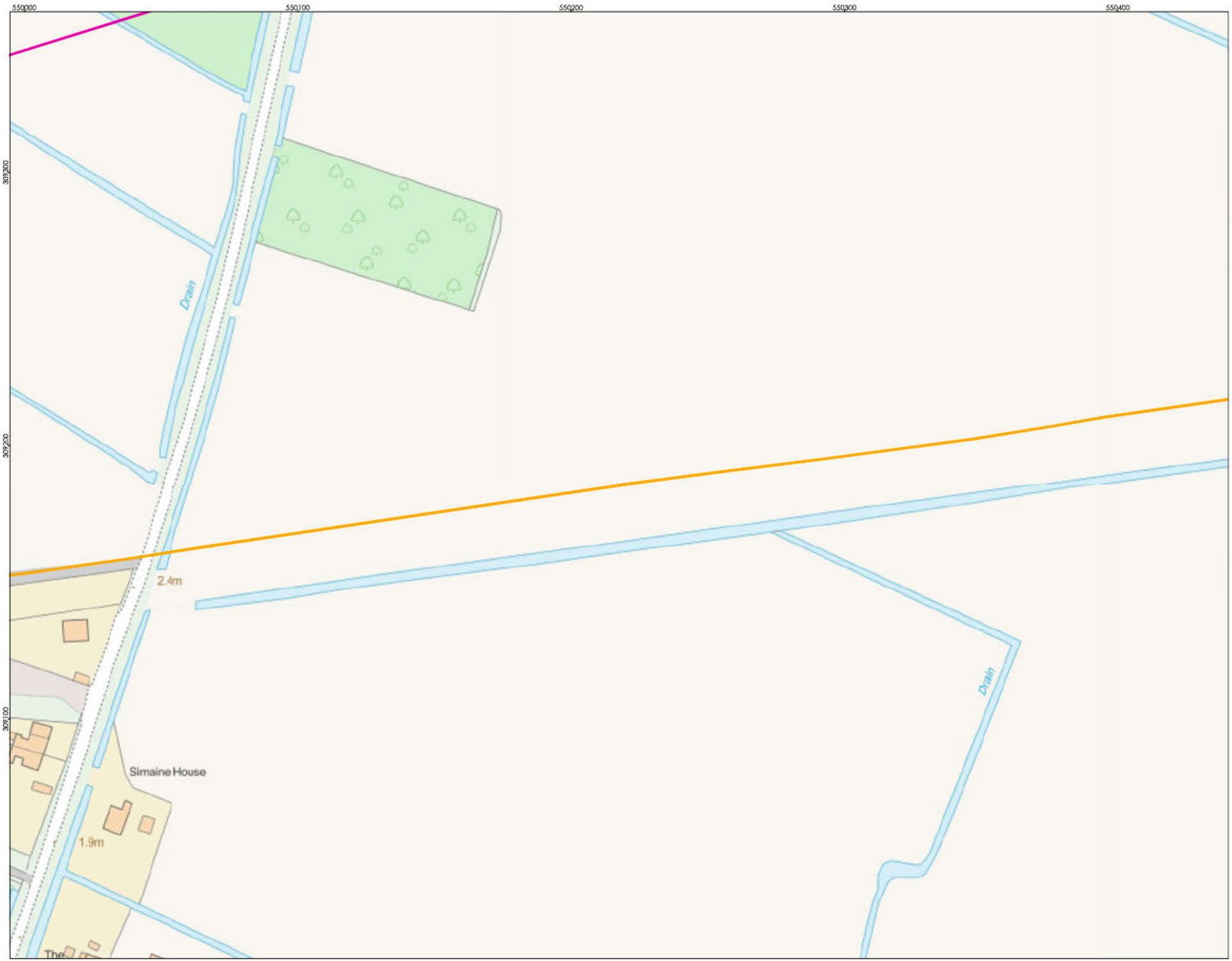

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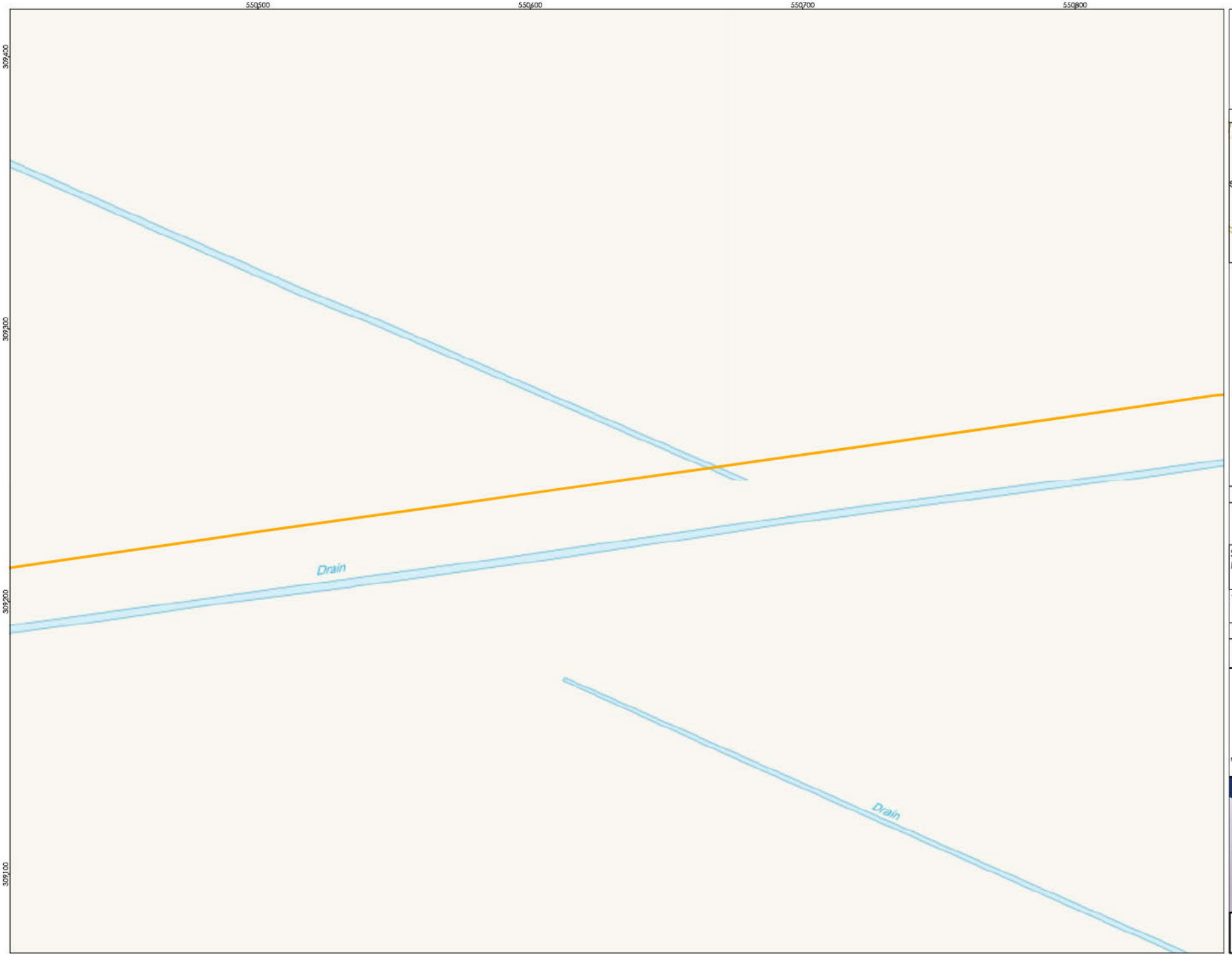

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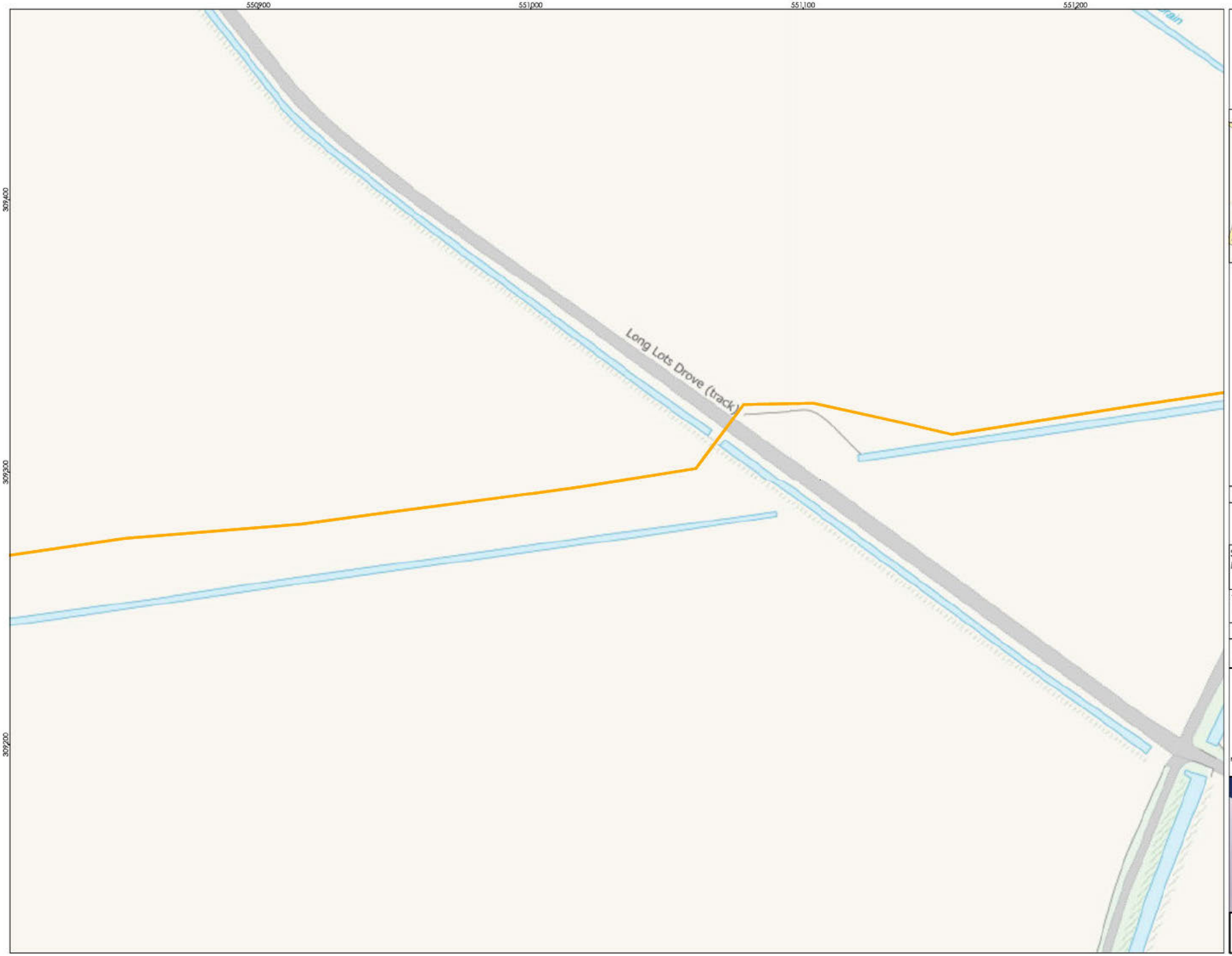

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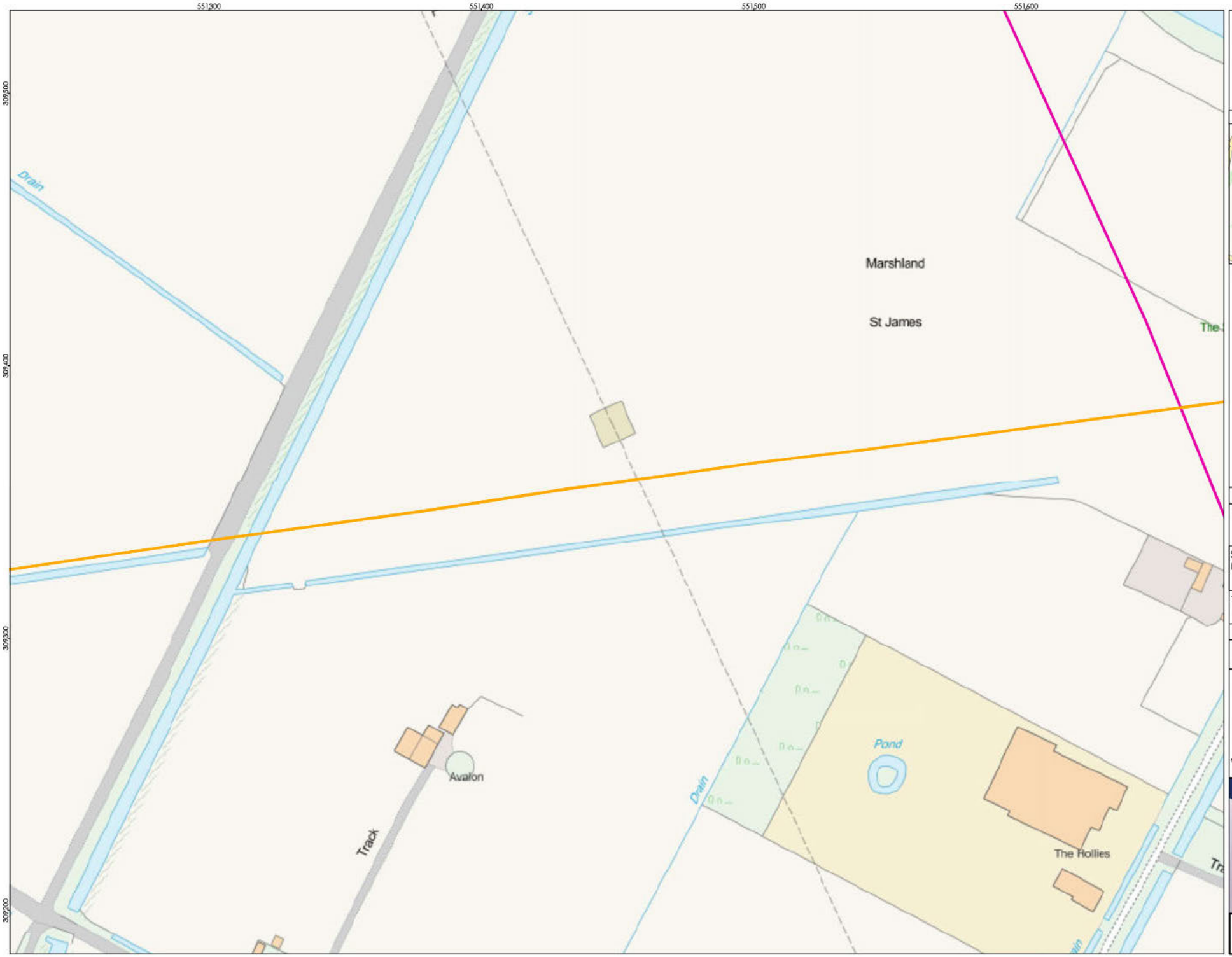

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[redacted]

DRAWING REF:
Cadent-2019-12-RW-INT-Medworth Energy

From: [redacted]
To: Medworth
Subject: RE: EN010110 Medworth Energy from Waste Combined Heat and Power Facility EIA Scoping Consultation
Date: 11 December 2019 10:32:03
Attachments: image001.png

Dear Karen.
Thank you for the notification. I confirm that I respond on behalf of the Chief Officer on the matter of consultations regarding proposals that affect the public highway.
Comment at this time is adjourned as there does not to be any actual proposals associated with the highway. Once received and supported by appropriate drawings etc, a response will be forthcoming.
Kind regards,

Derek Crosby 6760
Traffic Management Officer - Cambridgeshire
County Police Headquarters - Hinchinbrooke Park
Huntingdon
PE29 6NP
[redacted]

BEDFORDSHIRE POLICE
Protecting People and Fighting Crime Together
Creating a safer Cambridgeshire
HERTFORDSHIRE CONSTABULARY
Traffic Management Unit

From: Medworth [mailto:Medworth@planninginspectorate.gov.uk]
Sent: 05 December 2019 15:26
To: CROSBY, Derek 6760 [redacted]
Subject: EN010110 Medworth Energy from Waste Combined Heat and Power Facility EIA Scoping Consultation

Dear Mr Crosby

Please see attached correspondence on the proposed Medworth Energy from Waste Combined Heat and Power Facility.

Please note the deadline for consultation responses is Friday 3 January 2020 and is a statutory requirement that cannot be extended.

Regards

Karen

Karen Wilkinson
EIA and Land Rights Advisor
Major Casework Directorate
The Planning Inspectorate, Temple Quay House, Temple Quay, Bristol BS1

6PN

Twitter: @PINSgov
Helpline: 0303 444 5000
Email: Medworth@planninginspectorate.gov.uk

Web: https://infrastructure.planninginspectorate.gov.uk/ (National Infrastructure Planning)

This communication does not constitute legal advice.
Please view our Privacy Notice before sending information to the Planning Inspectorate.

Karen Wilkinson
EIA and Land Rights Advisor
Major Casework Directorate
The Planning Inspectorate, Temple Quay House, Temple Quay, Bristol BS1 6PN
[redacted]
Helpline: 0303 444 5000
[redacted]

Please note my working days are Monday, Thursday and Friday.

Web: https://infrastructure.planninginspectorate.gov.uk/ (National Infrastructure Planning)
Web: www.gov.uk/government/organisations/planning-inspectorate (The Planning Inspectorate)

Twitter: @PINSgov

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My ref: EIA/ES Scoping Response – Medworth
Your ref: EN010110 - 000004

Date: 3 January 2020

Contact: Emma Fitch
Telephone: [redacted]
E Mail: [redacted]

Cambridgeshire County Council

Steve Cox,
Executive Director
Place and Economy
Environment and Commercial

Box No SH1315
Shire Hall
Castle Hill
Cambridge
CB3 0AP

Karen Wilkinson
The Planning Inspectorate
Major Casework Directorate
Temple Quay House
2 The Square
Bristol
BS1 6PN

By e-mail to:
Medworth@planninginspectorate.gov.uk

Dear Ms Wilkinson,

MEDWORTH ENERGY FROM WASTE COMBINED HEAT AND POWER FACILITY, EIA/ES SCOPING REPORT, MVV ENVIRONMENT LTD.

Further to the submission by MVV Environment Ltd to the Secretary of State of the above scoping report, I set out below this Council's response.

The contents of the scoping report are acceptable in setting out the scope of the environmental impact assessment (EIA/ES), subject to being amended and amplified in accordance with the comments set out below. The following comments broadly reflect the structure of the EIA/ES scoping report.

The proposed facility would recover useful energy in the form of electricity and steam from over half a million tonnes of non-recyclable (residual), non-hazardous Municipal and Commercial and Industrial waste with an annual generating capacity of around 53 MW which will be exported to the grid. The facility will also have the capability to export steam and electricity to users on the surrounding industrial estates. It would require a new grid connection, to be installed by the relevant District Network Operator, in order to export electricity off site. The potential for heat off-take and the heat pipe connection will form part of the planning application. It is proposed the facility would process waste and generate electricity on a 24 hour basis. Waste would be brought on site between the hours of 06.00 and 19.00 seven days a week, except Christmas, Boxing and New Year's Days.

The combustion process would be one of a number of established technologies e.g. moving grate or fluidised bed. The facility would be required to meet the requirements of the EU Industrial Emissions Directive and would require an Environmental Permit from the Environment Agency.

The Site and Surroundings

The site is located within the Wisbech West ward of Cambridgeshire County Council and the Medworth ward of Fenland District Council. The site constitutes an operational waste recycling and transfer station and aggregates storage facility. The site is approximately 3.9ha in size and is located southwest of Wisbech centred at National Grid Reference TF 45881 08219. The site forms part of a wider industrial estate which is currently operated by Frimstone Limited. It is accessed off Algores Way and includes a material reception facility (MRF) including office and welfare facilities, a weighbridge and vehicle parking. Parts of the proposed Energy from Waste (EfW) Combined Heat and Power (CHP) Facility Site, outside of the MRF, are used for aggregate storage, and the use of a concrete crusher is permitted.

The site is bounded directly to the north by the BJ Brooks Ltd and Floorspan Contracts Warehouses and other industrial business units. A unit of Cambian Wisbech School is located approximately 200m to the northeast, TBAP Unity Academy is located approximately 500m to the northeast and the Thomas Clarkson Academy is located 750m to the north east of the proposed site. The residential areas of Wisbech lie beyond the industrial estate further to the north and east.

The southern end of the site is bounded by New Bridge Lane, connecting with Cromwell Road to the west which provides direct access to the A47 via a four-arm roundabout. To the east, New Bridge Lane terminates after the T-junction with New Drove Lane before reaching the A47.

A residential property (10 New Bridge Lane) is located approximately 70m to the south of the proposed site on land identified within the scoping report in figure 2.3 as a potential location for the Temporary Construction Compound. A residential property 'Potty Plants' with associated farmland is located 340m to the southwest of the proposed site along New Bridge Lane. In addition, Oakdale Place Travellers Site and Caravan Site are located 400m and 500m respectively to the south east of the intersection of New Bridge Lane and the A47.

To the west of the proposed site is an area of scrubland and a mature strip of vegetation within which lies the disused railway, known as the 'Bramley Line' which ran between Wisbech and March. West of the railway line, the industrial estate extends for a further 300m to Cromwell Road, after which there is a retail park. The retail park is constrained to the west by the River Nene.

General

Source of Waste

It is essential that the EIA/ES identify the broad sources, types, and proportion of wastes to be managed by the facility in order to aid assessment of the potential environmental impacts. These could be both negative and positive, and relate to a number of factors e.g. transport.

Non-Technical Summary

It is proposed that the main findings in the EIA/ES will be summarised in a non-technical summary, which is welcomed. This should be written in plain English.

Mitigation
It is noted that the EIA/ES will include any measures that have been embedded in the proposed development with a view to avoiding or minimising environmental effects, or delivering environmental benefits. Although construction phase impacts are transitional they, and any operational phase impacts, have the potential to cause unacceptable effects to the health and quality of life of those living and working near the site. It will need to be demonstrated that significant adverse impacts/effects or just adverse impacts have been minimised.

When considering mitigation measures the EIA/ES will also need to consider whether the envisaged measures make for an unsatisfactory development in other planning respects for example in terms of urban design, visual or amenity impact requirements. Such cross relationships will need to be identified and addressed.

Chapter 2: Description of the Proposed Development
In order for the EIA/ES to assess the impacts of the proposed development a fully detailed description of the proposal is required, and this must be set out clearly in the EIA/ES.

Requirements of all levels of relevant planning policy, including the supplementary planning documents produced by Cambridgeshire County Council and Fenland District Council, will need to be reflected in the proposed design and proposed implementation of the proposals, and thereby taken into account through the EIA/ES process.

Paragraph 2.3.14 of the scoping report is concerned with the proposed CHP connection and suggests that this will be located along the Bramley Line disused railway line. Further understanding of this is required including its impact relating to ongoing study work and local aspirations to bring the disused railway line back into use.

Paragraph 2.3.25 is noted for its statement that the proposed Energy from Waste Combined Heat and Power facility will be capable of handling over 500,000 tonnes of residual waste per annum. It is suggested that this level of capacity could generate significant transport journeys.

The location of the proposed facility is bounded by key transport routes that are already congested due to high volumes of traffic. The traffic impacts of the proposed development will therefore need to be fully assessed.

Paragraphs 2.3.44 – 2.3.47 of the scoping report considers the access improvements and suggests that such improvements would form part of the Development Consent Order (DCO). Based on the proposed tonnage of residual waste and the congestion of current strategic transport routes within Wisbech, it is suggested that improvements to the transport network are needed to support this proposed development. There is a need to fully understand all the transport and traffic impacts and ensure that such appropriate mitigation is determined.

Main Alternatives Considered
Whilst it is proposed to consider some alternatives e.g. site layout, design and access, identified in paragraph 2.2.4 of the scoping report, alternative locations are not to be

addressed. The proposal would be located on an allocation in the adopted Cambridgeshire and Peterborough Minerals and Waste Site Specific Proposals Plan (DPD) February 2012. However, this site was allocated for waste and recycling uses, not for Energy from Waste (See Policy SSP W1C). Accordingly the reasons why the site has been selected for this development, and whether or why other sites have not been considered, should be explained.

Chapter 3: Planning Policy

Although the scoping report indicates that it will identify relevant planning policy (in this Chapter and others), it is highlighted below that this has not been fully addressed. In the event that not all planning policy matters are fully addressed in the EIA/ES, then a separate Planning Statement should also be produced.

It is stated in the scoping report at paragraph 2.1.13 that a statement on the need for the proposed development will be provided as part of the DCO application. This should take account of the existing and emerging planning policy, and in the case of the emerging Minerals and Waste Local Plan the Council's Waste Needs Assessment November 2019.

Cambridgeshire and Peterborough Minerals and Waste Core Strategy (2011) and Site Specific Proposals Plan (2012)

The scoping report correctly identifies the above documents as being part of the adopted Development Plan for the site. However, in addition to the site being allocated under Policy SSP W1C for Waste Recycling and Recovery, it is also safeguarded through a Waste Consultation Area designated under Policy SSP W8D, and the overarching Core Strategy Policy CS30 Waste Consultation Areas. This is not mentioned in the scoping report.

Para 3.3.2 is incorrect, as the allocated site Algores Way, Wisbech is not allocated through the Core Strategy, but the Site Specific Proposals Plan, under Policy SSP W1C, not Policy WC1.

As the scoping report approaches planning policy on a subject basis it does not necessarily capture all the policies which are relevant to this proposal. One such policy is Core Strategy Policy CS29: The Need for Waste Management Development and the Movement of Waste. Another policy omitted is the overarching Policy CS2 Strategic Vision and Objectives for Sustainable Waste Management, which also needs to be taken into account in the EIA/ES or in a Planning Statement.

Cambridgeshire and Peterborough Minerals and Waste Local Plan (Proposed Submission, November 2019)

The Algores Way, Wisbech site is safeguarded through the above Plan as a Waste Management Area, under Policy 10: Waste Management Areas. Policy 16: Consultation Areas addresses the Consultation Area around the site, which is not mentioned in the scoping report. The Waste Management Area and the associated Consultation Area is shown on the Proposed Submission Policies Map.

The detailed timetable for the process of the EfW application, if accepted by the Planning Inspectorate on behalf of the Secretary of State, is not yet known. The

timetable for the emerging Local Plan is for the Examination to start in summer 2020, with the Inspector's Report anticipated in late summer or early autumn; and adoption in November 2020. It is therefore possible that the Local Plan will carry more weight by the time the Examination of the EfW proposal takes place, particularly if the Inspector's Report has been received and the Councils are moving towards adoption. Thus, it would be advisable for the Environmental Statement (ES) to fully consider how the proposal sits with the policy of both Plans, the currently adopted and emerging.

No reference is made in the scoping report to Policy 1: Sustainable Development and Climate Change, except for in the context of the Climate Change Chapter. However, this policy is wide ranging and full consideration of its requirements needs to take place. The other technical chapters should consider if this policy applies, as it also references air quality, transport, design etc.

As the scoping report approaches planning policy on a subject basis it does not necessarily capture all the policies which are relevant to this proposal. The EIA/ES (or a Planning Statement) should ensure that all relevant policies are taken into account, including Policy 3 Waste Management Needs and Policy 4: Providing for Waste Management. Consideration should be given as to how the proposal sits against these policies, and other relevant evidence documents supporting the Local Plan, including the Waste Needs Assessment, November 2019 and Developing a Spatial Strategy for Waste Management Provision, November 2019.

Chapter 4: Scope of the Assessment

It is considered that the scope of the assessment is appropriate for the development proposed subject to the incorporation of the additional requirements and comments detailed in this response.

Chapter 5: Traffic and Transport

A Transport Assessment (TA) will be required to outline the trips generated by the proposed development and how these are to be mitigated, this should include a worse-case scenario. However, for detailed advice the applicant is advised to discuss the specific requirements of a TA, prior to any application being made, with Cambridgeshire County Council's Transport Assessment Team. The TA could form part of the Environmental Statement.

The reference made in paragraph 2.3.54 to the development of a Construction Environmental Management Plan (CEMP) and Construction Traffic Management Plan (CTMP) by the applicant are welcomed as these will be relevant for the construction phase of development.

The Highway Authority has concerns regarding the impact of the proposed development on the condition of the existing highway network for which it is responsible. The network will be liable to damage from both construction traffic and vehicles accessing the plant once it becomes operational. The Authority notes the provisions in the Highways Act 1980 regarding extraordinary traffic and the associated provisions regarding the recovery of expenses arising from additional maintenance requirements.

The Highway Authority might seek the payment of commuted sums for any new highway infrastructure that it is requested to adopt associated with the proposed development. Similarly, the Authority might seek monies to improve infrastructure, if its mode of usage alters in perpetuity.

The Authority notes that both the grid and heat connection corridors might impact upon the network of highways (including rights of way) for which it is responsible.

The Authority would require the promoter to seek all relevant legal orders to divert, create or extinguish rights of way. Any such proposed orders would be subject to the relevant legal tests and the approval of the Authority, in accordance with its policies.

Cambridgeshire County Council Highway Asset Information Team can research and provide further information regarding the extent and status of highways affected by the proposed development, on a cost-recoverable basis. Please write to searches@cambridgeshire.gov.uk if you wish to request highway extent information.

The applicant should be aware that Highways England will need to be consulted in respect of any proposal which will have a material impact on the A47.

There is a possible impact on the proposed Southern Relief Road alignment and proposals set out in the Wisbech Access Study.

The Highway Authority advise that Algores Way is adopted up to Britannia Way, it is Cambridgeshire County Council policy that the Authority does not adopt industrial estate roads. Beyond this point Fenland District Council are the landowners and would therefore need to be consulted if access is proposed via Algores Way.

New Bridge Lane is a public highway up to New Drove, however it does require improvement (widening/possible reconstruction) and pedestrian and cyclist provision for employment use. Newbridge Lane is proposed as a possible access route, but the applicant should note that this route is currently stopped up at its intersection with the railway line. The amount of work required will be dictated by the type and volume of the multi model trips generated by the proposed development.

There is a significant omission within the scoping report with the more strategic projects that the Cambridgeshire and Peterborough Combined Authority (CPCA) are promoting and specifically the A47 upgrade and proposed Wisbech Rail work. These schemes are caught in adopted policy or emerging policy by the CPCA in the draft Local Transport Plan (LTP) (due to be presented to the board in January 2020), Climate Public Expenditure and Institutional Review (CPEIR), Local Industrial Strategy (LIS) etc. The applicant is therefore advised to contact the CPCA at the earliest opportunity.

The proposed re-use of the disused railway line could be problematic and the applicant is advised to contact the Bramley Line Heritage Railway Trust, the details of which can be found on their website at [redacted]

The applicant is also advised that preparatory work has commenced in respect of the Wisbech Access Strategy Phases 2 and 3 which may require medium to long term

accommodation of measures which would need to be addressed within an Environmental Impact Assessment.

Sections 5.1 – 5.6 set out the proposed initial approaches for the work. The Applicant is advised that all aspects of this approach require approval from Cambridgeshire County Council's Transport Assessment Team before work commences.

From section 5.3 and 5.4 there seems to be a suggestion that all traffic to and from the development will be solely in an east or westerly direction. No consideration appears to have been given concerning journeys to and from the north of Wisbech. It is essential that further work is undertaken once the origins of the waste are known as mentioned in paragraph 5.3.2 including a review of the baseline.

References to the Wisbech Access Strategy and its specific schemes are welcomed along with the opportunity for further engagement about this ongoing transport work.

Two other important transport work areas which must be addressed in an Environmental Impact Assessment are the Wisbech Railway project and the A47 duelling proposals, both of which are being funded by the CPCA and delivered by Cambridgeshire County Council. It is noted that neither project is mentioned within the traffic and transport section, but it is considered that regard must be had to them.

The methodology for assessing the environmental effects to air quality from traffic and transport has been referred to in paragraphs 7.5.8 and 7.5.27 of the EIA/ES scoping report.

The impacts from dust, odour and noise from vehicle movements on and off the site should be detailed when assessing the environmental effects from traffic and transport or when assessing air quality or noise.

The impact of vehicle movements on residents, businesses and educational facilities should be made clear. To divert 500,000 tonnes of waste to this facility, an estimated calculation has demonstrated this could result in an average of 110 to 150 vehicle movements a day. (Based on waste being transported in 25 tonne bulkers to the facility, with deliveries being accepted 5 to 7 days a week). Any transport links, within the district, in addition to road haulage should also be detailed in the EIA/ES.

Chapter 5 Traffic and Transport should also consider the data and findings contained in the Transport and Health Joint Strategic Needs Assessments [redacted], particularly links to air quality and use this as part of the baseline assessment.

Chapter 6: Noise and Vibration

Policy Considerations

Table 6.1: There is duplication as Policy 18 of the emerging Cambridgeshire and Peterborough Minerals and Waste Local Plan is referred to twice. The reference to the adopted Minerals and Waste Core Strategy (2011) is restricted to Policy CS24 Design of Sustainable Minerals and Waste Management Facilities. Policy CS34 Protecting Surrounding Uses should also be considered in the context of noise and vibration.

Reference should be made to Policy DM3 of Delivering and Protecting High Quality Environments in Fenland Supplementary Planning Document July 2014.

Noise and Vibration Considerations

The suggested content of this chapter appears generally acceptable. However, particular consideration must be given to the prevention of nuisance that may be caused by the proposed use (bearing in mind the potential for 24 hour working involving plant and equipment, HGV movements and working that will be audible outside).

In order that any baseline noise monitoring provides a robust and representative basis for prediction, fixed positions should be used and the monitoring period should be for an adequate period of time i.e. 3-4 days and include weekend data. The EIA/ES should identify appropriate sensitive receptors and propose monitoring locations that would be acceptable to present a representative picture. In cases where two or more receptors are in close proximity only one location must be used. If fixed positions cannot be agreed then the Environmental Health Officer should be contacted to agree the approach to any alternative monitoring methods.

On determining the baseline sound levels, local wind speed and direction data should also be provided within the weather reporting for the direction of monitoring periods. The impact of the wind direction on baseline sound levels by nearby dominant noise sources should be considered when demonstrating the typical background noise level.

The noise impact assessment made in line with BS 4142:2014+A1:2019 should include in the appendix; all raw data, identification of excluded data, calculations and assumptions. Where the impact assessment identifies mitigation measures, these should be provided with attenuation calculations, and any assumptions made.

A construction and operational management plan should demonstrate how impacts to receptors will be controlled if found to be necessary.

In addition to the potential impacts on existing residential premises, including those identified in the submitted scoping report, careful consideration must be given in respect of any other proposed development in the area.

The proposed allocated residential and industrial developments at Wisbech must be considered, particularly in relation to noise and odour from any activities proposed. In terms of noise, this may include the consideration of environmental noise barriers in the form of bunds or acoustic fence or a combination running continuously along some parts of the site boundary if appropriate. The final height and length of such environmental noise barriers could only be finalised by detailed noise modelling but to be effective it would have to be of such a height to block the direct line of sight to proposed residential property and habitable rooms. However in considering such a barrier constraints such as existing access roads and the presence of surface water attenuation ponds / drainage features will need to be taken into account.

In addition to the receptors outlined in table 6.3, The Anglia Community Eye Service Clinic (32 Cromwell Road, Wisbech, PE14 0SN) should be considered. The clinic is

approximately 350 metres from the proposed development. The clinic provides treatments, surgeries and uses sensitively calibrated equipment. In the submitted EIA/ES, the clinic should be considered as a nearby highly sensitive receptor and the impact of noise, vibration and dust should be identified.

In line with the traffic and transport environmental impact assessment the noise impact assessment should include vehicle movements as well as operational equipment.

Chapter 7: Air Quality

Policy Considerations

Table 7.1: The reference to Policy CS34 of the adopted Cambridgeshire and Peterborough Minerals and Waste Core Strategy is inadequate. This policy requires that waste management development will only be permitted where it can be demonstrated there would be no significant harm to the environment, human health or safety, existing or proposed neighbouring land uses, visual intrusion or loss to residential or other amenities.

Air Quality Considerations

Policy 18 of the emerging Cambridgeshire and Peterborough Mineral and Waste Local Plan (Proposed Submission) provides clarification that air quality encompasses factors including 'odour, fumes, dust, smoke or other sources'. All these aspects of air quality need to be considered in the ES.

Owing to the nature of the proposal an air quality assessment must be provided and include the following:

- Baseline characterisation of local air quality;
- Qualitative assessment of air quality impacts from construction activities;
- Qualitative assessment of air quality impacts during operational phase of the proposed development using relevant guidance including that published on development control by Environmental Protection UK; and
- Recommendation of mitigation measures, where appropriate, to ensure any adverse effects on air quality are acceptable.

The applicant is advised that there are three AQMA's within the Wisbech area and that traffic is a factor in Wisbech AQMA No.3 (NO2), this is a strategic road route into and out of Wisbech and links to the proposed study area. As stated in paragraph 7.4.7 of the scoping report, this AQMA has not been revoked. Data available does show that no exceedances of the annual mean have been identified. There is no continuous monitoring data available from this location to demonstrate that daily, eight hourly or hourly means have not been exceeded. In addition, transport plans in the region highlight increasing transport demands on the Wisbech main routes alongside current limited transport options.

The other two AQMA's relate to industrial emissions of PM10 and SO2. As outlined in Fenland District Council's Air Quality Plan1 evidence is being gathered to revoke these two Wisbech air quality management areas relating to a historic combustion process that has been removed. To revoke an AQMA a local authority must demonstrate that

the risk of elevated pollution levels will not return to a location once the AQMA has been revoked.

With regard to existing AQMA's, working with transport development plans, a holistic solution is being developed to respond to increasing transport demands which will in turn improve the local air quality. The outcome of the Transport Plan actions will demonstrate if on revocation future concerns of elevated NO2 levels can be addressed.

For both NO2 and PM10 (and potentially smaller particulates), the current traffic situation needs to be understood when considering how the proposals might affect the AQMA. This is cross-referenced in the scoping report.

It is noted that there are only limited mentions of traffic and transport within this chapter, whilst it is appreciated that transport is covered within a separate chapter, the transport effects on local air quality must be fully considered. Further consideration needs to be given to the air quality impacts from a transport perspective, particularly given the suggestion that the site will be capable of handling over 500,000 tonnes of residual waste per annum.

The adjacent industrial site has a number of different Environmental Permitted Sites (regulated by the Environment Agency and Local Authority). The EIA/ES should detail if the incineration process will result in a cumulative impact on air quality. If a cumulative impact is identified, the EIA/ES should detail how the existing permitted processes will be impacted on and any burdens it will place on them.

The EIA/ES should consider the impact of the number and type of vehicle movements that the proposed development will have as well as the incineration process. The impact to the existing NO2 AQMA should be considered.

The scoping report has identified a number of sources of data to establish estimated background pollutant concentrations. The EIA/ES should demonstrate the impact of pollution concentrations if the development was operational. Real time monitoring of background pollution concentrations will be required and can be agreed.

All stack height calculations should be provided with raw data, including an analysis of wind direction and weather conditions to demonstrate the likely environmental impacts of this proposal.

The approach proposed in Table 7.1 to comply with the National Planning Policy Framework (NPPF) paragraph 181 on air quality and air quality management areas is supported, namely "*There are four AQMAs in Fenland District Council's jurisdictional area, including three within Wisbech for nitrogen dioxide, particulate matter and sulphur dioxide. These pollutants will be emitted from the stack (all three pollutants) and from the exhausts of construction and operational traffic. As such, it is imperative that appropriate mitigation measures are embedded in the design to ensure the Proposed Development does not prevent the achievement of strategic objectives within Fenland District Council's air quality action plan.*"

It is recommended that Public Health England, the technical experts on Energy from Waste Facilities in respect of health impacts, should be included in all future informal and formal consultations and in respect of the Application when submitted.

Chapter 8: Landscape and Visual

Policy Considerations

The document refers to specific parts of the National Planning Statement for Renewable Energy Infrastructure, but does not refer to Fenland's Policy LP14, which highlights Renewable Energy and the need to assess individually and cumulatively "surrounding landscape, townscape and heritage assets" and "residential and visual amenity".

Fenland Local Plan identifies policy LP6 and highlights that proposals will be assessed against "Impact on natural and heritage assets" and "Impact in terms of urban/landscape character, and setting of settlements".

In referring to LP16 of the Fenland Local Plan, the bullets only refer to 2 of the rather more extensive list of applicable criteria.

Cambridgeshire and Peterborough Minerals and Waste Core Strategy 2011 - references are missing to policies CS24: Design of Sustainable Minerals and Waste Management Facilities (which links to the SPD (below); and CS34: Protecting Surrounding Uses which refers to visual intrusion and residential or other amenity.

Whilst it is acknowledged that this is an energy proposal, it is still considered that The Location and Design of Waste Management Facilities SPD for Cambridgeshire and Peterborough is relevant to the project and needs to be taken into account, for example in respect to location, design, character, distinctiveness, use of materials, lighting, boundaries and planting and the consequences for landscape and visual impact.

High quality and appropriate landscape design can help deliver the aims of Cambridgeshire and Peterborough Adopted Waste Core Strategy Policy CS35: Biodiversity and Geodiversity.

Landscape and Visual Considerations

The highest levels of design, layout and landscape will be required to reduce possible significant landscape and visual effects.

Mitigation measures must be part of the proposed scheme. The Landscape and Visual Impact Assessment (LVIA) must demonstrate how the mitigation proposals have reduced expected negative landscape and visual effects to an acceptable level.

The area to the south of the site is identified in the scoping report as predominantly for business purposes, however the Fenland Local Plan allocation also has potential for around 100 dwellings and this should be referenced.

The LVIA must also consider any likely future baselines different to the existing, and potential Cumulative Landscape and Visual Impacts with other developments in the area.

An assessment must show whether effects are positive or negative, and proposals to mitigate negative effects should be described.

The National Planning Policy Framework (NPPF) – with respect to paragraph 170 of the NPPF, it is important to recognise that all landscapes have a value, regardless of designation. Therefore, it is imperative that the assessment takes into account the value of the landscape and recognises the inherent intrinsic character and beauty of all landscapes, not just that which is designated, applying the principles of box 5.1 GLVIA3, page 84; as well as recognising the factors which contribute to value.

It is not clear whether the development will assess the effects on townscape, which form an important part of landscape, or an ES townscape chapter in their own right.

Lighting effects of the proposed facility needs to be carefully considered and assessed.

Study Area and Zones of Theoretical Visibility (ZTV)

The Study Area has been refined at 5km ahead of carrying out any assessment work. It is evident from the ZTV mapping produced already that the effects of the development are likely to extend far in excess of this distance, given the extensive coverage of colour wash across the drawings. Accordingly, the study area needs to be widened to an appropriate distance for a project of this scale – being 50m height building and 100m stack (noting that ZTVs for wind turbine guidance are often much greater) to enable an adequate range of receptors to be assessed and the effects identified.

The impact of longer range potential impact views outside the 5km study area should be considered and scoped into the EIA/ES to demonstrate whether there will be any significant visual impact from the height of the chimney stack and overall building height.

It is also considered imperative that in considering the landscape and visual impacts that additional significant views should be included from the west of Wisbech.

Photographs from key locations should include verified views to demonstrate the possible visual impacts of the scheme. These must show visual effects on completion of the project (0 years) and after the establishment of the landscaping scheme (15 years). The applicant should agree the precise methodology to produce montages, and the number required with the host authorities and this should be reflected in the EIA/ES.

Viewpoints - Additional viewpoints should be discussed where the site will be visible - long distance footpaths, marinas, nature reserves (where appropriate). The agreed outcome of these discussions should be reflected in the Environmental Impact Assessment and the consequential Environmental Statement.

Whilst the study area shows the main settlement of Wisbech being washed over by the ZTV, it is not made clear but, it is essential that the LVIA also takes into consideration the landscape/townscape impacts of the proposed development, and those of surrounding villages. Policy LP8 in the Fenland Local Plan (and supporting text 4.3.3) makes reference to some of the characteristics that make Wisbech and its context distinctive, whilst Fenland Local Plan Policy LP12 refers to the Rural Areas Development Policy.

Whilst it is noted that paragraph 8.4.1 of the scoping report suggests 'series' of ZTV's have been produced, the map layers are all overlaid, so it is not possible to clearly see the difference between building height and extent of theoretical visibility compared to the stack (they should be modelled and ZTV's generated separately), compared to the grid connection area. It is also apparent that the input data used is based on a series of points, and this should be updated in due course to accurately reflect the scale, depth and width and mass that would be apparent from a full 3D block model. Until the study area is increased to a suitable distance (see also wind turbine developments methodologies), then the scope and breadth of the study will inform a more comprehensive range of receptors for the landscape and visual impact assessment.

Landscape Baseline needs to consider aspects of ecological and cultural heritage value and other aspects (including designations) that may contribute to value and character in the landscape and or townscape, either in the wider or immediate context of the study area. This is clearly set out in GLVIA3. There are designations in the area, which should be taken into consideration.

Photomontages are certainly required and should be carried out to the latest technical standards following the latest guidance from the Landscape Institute and with regard to the types of presentations that form wind turbine studies, and from locations agreed with the local authority.

In terms of visual receptors there needs to be consideration relating to Chatteris Airfield (North London Skydiving Centre), Gildenburgh Water, Rings End Nature Reserve, WWT Welney. Churches with towers that are open to the public for viewing should be considered, this makes the local parish church at Wisbech of interest (St Peter and St Paul).

The number of visual receptors being considered for the LVIA is insufficient for a project of this scale, and a greater range and increased number of receptors should be identified and agreed with the host authorities.

The limited scope of the ZTV means that the interpretation of the effects that may or may not be significant have not been fully considered. The study and study area needs to be widened to capture a fuller and realistic range of receptors and correctly represent the extent of character effects and effects on visual amenity. The very narrow approach taken thus far, has the consequence of missing some key receptors and elements that are of relevance to the EIA and the landscape and visual effects.

<u>Landscape and Heritage</u>

The relationship between Landscape and Heritage needs to be carefully considered (there are separate policies relating to Heritage in various Local Plan documents); however, the effects of development relating to the historic environment of Wisbech and within local villages such as (but not limited to) Elm (with Conservation Area, Church, Listed Buildings etc.), and Parson Drove need to be carefully established. As such it is considered that the list of visual receptors for assessment in the LVIA are probably insufficient and should be expanded.

Landscape Impacts of the Construction Phase

Paragraph 8.5.5 of the scoping report suggests there are no significant landscape effects for the construction period – the construction period will involve direct change to the site itself and the surroundings, by use of large scale equipment (cranes, lighting and erection of supporting towers and structures), which are likely to cause a significant effect albeit for a temporary period of time.

It is not accepted that the effects of the Construction Phase (e.g. in Fenland) would not give rise to significant effect (8.5.9) – it is also not correct to measure an effect of scale on the whole of a character area. It is highly likely that the effects will be significant on part of the Local Character Area.

Cumulative Effects

Cumulative Effects need to be agreed and assessed accordingly, and possibly modelled with a ZTV (if helpful, depending on the element).

Chapter 9: Historic Environment

The inclusion of the Historic Environment chapter in the Environmental Impact Assessment is welcomed, however, the scope of the chapter proposed as presented is considered too limited a scope for dealing with fenland archaeology.

This proposal area occurs in a region of Flandrian deposits mostly comprising marine clays, silts and sands where most of the known Roman and Medieval settlement occurs on an upper silt deposit, as described by the Fenland Project survey of the 1980s and 1990s. (Hall, D. 1996. *The Fenland Project, Number 10: Cambridgeshire Survey, Isle of Ely and Wisbech*, East Anglian Archaeology Report No. 79).

Paragraph 9.3.1 of the scoping report identifies the size and centering of the study area for direct disturbance of archaeology as 1km from the Main Development Site boundary. Whilst this is sufficient for impacts on surface archaeology at the Main Facility Site it does not adequately consider the impacts of development at significant depth e.g. for deep excavations required for construction at the Main Development Site OR development in other areas within the proposed development area e.g. along the Grid Connection Corridor. The Historic Environment Team of Cambridgeshire County Council has the following recommendations to make:

Desk-based assessment areas

Within the larger Red Line Boundary there is no information given on the possible size, number, location or impact of substations, infrastructure or cable diggings along these two potential routes and some consideration should be given to centering a study area on these other sites of development along the Grid Connection Corridor, when identified, in order to adequately assess the impact on any potential heritage assets.

Fen development and tidal environment

The lack of a geoarchaeological approach in Chapter 9: Historic Environment is noted, this approach is considered essential for evaluating areas within the tidal flats around Wisbech and The Wash where deposits sequences extend to depths in excess of 20m (see paragraph 12.4.11). In these areas, such as those at the Main Development Site and along the Grid Connection Corridor, a geoarchaeological assessment is recommended for any locations in which work at significant depths will occur. Indicative

of periods of low marine activity, soil development and stability, land-surfaces may be present within deep silt sequences that could contain sensitive and significant heritage assets relating to archaeological activity from different periods throughout the Holocene. The identification of the location and depth of potential ancient land surfaces would be essential. A geoarchaeological strategy is required to augment understanding in this very challenging terrain.

An assessment of the impact of poles, pylons, other structures or cable diggings on any potential ancient land structures within the tidal silt sequence would then be necessary.

The scoping report does not identify any historic assets including listed buildings and scheduled monuments either on site or in close proximity to the site. Both proposed Heat and Power Connections have HER monument points within their boundaries. See Figure 9.1 (page 242) & Figure 9.3 (page 243).

The EIA/ES should include an assessment of the significance of any level of harm which would be caused to the relevant heritage asset and its setting by virtue of the scale and location of the development proposed.

Both Heat and Power Connections have HER monument points within their boundaries. Heat connection passes by listed building, Power has listed building within area Grid Connection Area. See Figure 9.1 (page 242) & Figure 9.3 (page 243).

It is considered that for the avoidance of doubt and for clarity as to the exact impact of the proposed facility it would be expected that any future EIA/ES would include reference to the Wisbech Conservation Area and listed buildings within the Wisbech Conservation Area and provide evidence of visual impact, or lack of, from these designated heritage assets.

The scoping report makes reference to Viewpoints (VPs) and Zones of Theoretical Visibility (ZTV) but does not include a visual evidence base to actually back this up and allow impact to be fully understood, as already noted in the landscape comments above. Wisbech Conservation Area is a conservation area that affords a very high heritage value and it is important the impact of this proposal on this conservation area is evidenced. In this respect the EIA/ES should include this information.

In two specific instances the grid connection corridor runs very close to listed buildings. Any future EIA/ES will need to give full and specific consideration to the impact of the proposals on the setting of Austin Farmhouse, 4 Burrett Road (grade II) List Entry No 1342384 and Greens Cottage, Folgate Lane (grade II) List Entry No 1264180 and fully identify what grid connection infrastructure will be utilised in these localities and how this will impact on the setting of these listed buildings.

Where other heritage assets, specifically listed buildings and conservation areas, occur within a 2Km radius the EIA/ES should make proportionate reference to potential impact on the setting of these designate heritage assets.

Identification of non-designated heritage assets (as defined by Annex 2 NPPF (Feb 2019)) will have to be taken into account, for example, where the grid connection

corridor is running through or close to built environments such as at Walpole Highway, eastern edge of Walsoken, northern end of Elm and Emneth.

Chapter 10: Biodiversity

Noting in paragraph 10.5.5 of the scoping report that no ecological surveys have yet been carried out, it is important that the proposed Phase 1 surveys, are followed by targeted ecological surveys, to be carried out at the earliest opportunity to inform the EIA/ES.

It is also noted that the extent of any such surveys will be discussed with relevant consultees, which is welcomed on the basis that Cambridgeshire County Council as one of the host authorities would be a statutory consultee.

Survey work should be undertaken in accordance with best practice standards. Any deviations should be robustly justified within the EIA/ES.

In addition to the scope of habitats and species listed in Box 10.1, consideration should also be given to Species of Local Importance, including Cambridgeshire & Peterborough Additional Species of Interest and species on the vice-county 29 Rare Plant & Species of Conservation Concern registers.

It is important that the proposed survey work includes not only the main development site and grid connection but also any additional impacts relating to the scheme such as the proposed construction compound sites and any proposed above-ground cabling.

Ecological impacts relating to both the construction and operational phases should be fully assessed.

The EIA/ES should demonstrate that the project has been developed using the Mitigation Hierarchy principles; any adverse impacts should be avoided in the first instance. If this is not possible, then adequately mitigation should be undertaken to lessen such impacts. Any residual impacts must be adequately compensated.

Design

The EIA/ES should demonstrate that the project has been developed using the Mitigation Hierarchy principles: any adverse impacts should be avoided in the first instance. If this is not possible, then adequate mitigation should be undertaken to lessen such impacts. Any residual impacts must be adequately compensated. Decommissioning of the site should be well thought-out and pragmatic to minimise any additional adverse impact on biodiversity and avoid any destruction of ecological mitigation works created through the lifetime of the operation (e.g. removal of any underground pipes/ cabling).

A well designed project should be able to meet the revised NPPF and emerging Cambridgeshire and Peterborough Minerals and Waste Local Plan requirements to secure a biodiversity net gain within the red-line boundary. This should focus on creating priority habitats and species / habitats of county importance and which are indicative of the local landscape.

The scheme provides an excellent opportunity to create landscape-scale ecological enhancements and to deliver against the Habitat Opportunities Maps for Cambridgeshire. It also provides opportunities for wider environmental benefits to meet the objectives of the Cambridgeshire Green Infrastructure Strategy (2011) and Cambridgeshire and Peterborough Local Nature Partnership's "doubling nature" vision to increase land coverage for nature and access for people.

Cambridgeshire is a partner of the National Heritage Lottery Fund/Ministry of Housing Communities and Local Government (MHCLG)/National Trust funded Future Parks project which is looking at the future provision and sustainable management of parks and green spaces in the County. Cambridgeshire County Council would be keen to work with the applicant and the District Council on any green space allocation as part of the development.

Datasets

Records of priority habitats / species and notable / rare or protected species and county wildlife sites, should be consulted (available from the Cambridgeshire and Peterborough Environmental Records Centre (CPERC)). The data search area should go beyond 2km if it is demonstrates this has the potential to be impacted by the proposal (e.g. sensitive receptor for air pollution).

Priority habitats in Cambridgeshire are not well mapped on Natural England / MAGIC's national dataset and therefore, local habitat data should be obtained from CPERC, including traditional orchard (a traditional habitat around Wisbech) and Phase 1 habitat for the red-line boundary and surrounding land.

Habitats Opportunities Maps, available from CPERC, should also be utilised as a basic guide to prioritise for habitat creation in the area. However, this dataset will need professional interpretation to ensure the habitats at the site-level / part of this development.

Surveys

All surveys should be undertaken in accordance with best practice standards, with all aspects of the development receiving sufficient survey effort (the EIA/ES scoping report omits construction sites and CHP connection corridor from the proposed surveys). Any deviations should be robustly justified within the Environmental Statement.

The EIA/ES scoping report fails to include botanical surveys. Botanical surveys should be undertaken for Priority habitats and habitats suspected of being of county important (in accordance with County Wildlife Site criteria, e.g. drainage ditches). Botanical surveys should also be undertaken where suitable conditions are present for potentially rare / notable plants or assemblages or priority species of plants (e.g. vice-county 29 rare plant & species of conservation concern registers).

It is important that the bird surveys will cover breeding, wintering and migratory birds – particularly given the proposal for above ground cabling, and the potential impact on Goose and Swan Functional Impact Risk Zone.

Survey consideration should be given to species of local importance and Cambridgeshire and Peterborough additional species of interest. For example, locally notable / rare species.

Assessment

Potential effects on statutory designated biodiversity sites should also consider the impact of the proposal on functional land located beyond the designation boundary, such as Goose and Swan Functional Land Impact Risk Zone. It should also include consideration of migratory routes for designatory bird population, particularly those on-route to nearby Special Areas of Conservation / Special Protection Areas.

Potential effects should also consider impact on locally important sites (County Wildlife Sites), habitat and species. This should include Cambridgeshire & Peterborough Additional Species of Importance and county rarities / notable species, as well as Local Biodiversity Action Plan habitats. Local reference documents (e.g. county atlases & CWS criteria) should be consulted to determine the level of impact on all taxa and habitats.

An assessment of the impact resulting from the decommissioning phase will need to be included. The decommissioning programme should be closely scrutinised to avoid unnecessary impacts, particularly within areas that have established for biodiversity through the operational phase. For example, is it necessary to remove underground services? Any ecological mitigation areas should be retained in perpetuity and not returned to their original state.

Cumulative impact should include Cambridgeshire and Peterborough's draft Local Transport Strategy (2019) which includes reopening of the disused Wisbech-March rail-line and improvements to the A47. It will also need to consider other Nationally Significant Infrastructure Projects and other developments within the local area, as well as those further afield (particularly affecting Natura 2000 sites).

It is recommended that the impact of the development is assessed without mitigation measures, and then again when mitigation / compensation measures have been implemented to show a clear demonstration of how the scheme will adequately address any impacts.

Habitats Regulation Assessment

Whilst Habitats Regulation Assessment (HRA) fails outside the EIA/ES scoping process, it is worthwhile highlighting that the applicant will need to discuss with Natural England whether an HRA is required and the scope of the HRA.

Designated Sites

Potential effects on statutory designated biodiversity sites should also consider the impact of the proposal on functional land located beyond the designation boundary, such as the Goose and Swan Functional Land Impact Risk Zone associated with the Nene and Ouse Washes International Sites.

It is noted that paragraph 10.5.4 of the scoping report states that Local Wildlife Site data will be requested from the CPERC; of particular note is the presence of the River

Nene County Wildlife Site which is located in close proximity to the application site. Therefore any potential impacts to this site should be fully scoped and assessed.

Opportunities for Ecological Enhancement/Habitat Creation

The scheme represents a good opportunity to create landscape-scale ecological enhancements and deliver against the Habitat Opportunities Map for Cambridgeshire and objectives of the Cambridgeshire Green Infrastructure Strategy, and should seek to deliver biodiversity net gain.

Habitat Opportunity Mapping data is available from CPERC and should therefore be sought to assist with prioritising opportunities for habitat creation in the local area.

Any forthcoming scheme must adequately demonstrate that the proposals will result in a net gain in biodiversity value, in accordance with local and national planning policy. This assessment should be based on Defra's Biodiversity Off-setting Metric / Cambridgeshire County Council's Biodiversity Checklist & Guidance (part of Cambridgeshire County Council's local validation checklist). The details of the proposed methodology of survey work have not been provided. All survey work and assessments should accord with best practice guidelines and should also consider local priority species and Cambridgeshire and Peterborough Additional Species of Interest (list available from [redacted]

Chapter 11: Hydrology

The scoping report submitted includes information on the water environment proposals. The principles of surface water drainage outlined within the scoping report are acceptable. However, Cambridgeshire County Council as the Lead Local Flood Authority (LLFA) expect a full flood risk assessment and surface water drainage strategy to be submitted to support any application which must include:

i. How the proposed surface water drainage scheme has been determined following the drainage hierarchy;
ii. Pre development run-off rates;
iii. Post development run-off rates with associated storm water calculations;
iv. Discharge location(s);
v. Drainage calculations to support the design of the system;
vi. Drawings of the proposed surface water drainage scheme including sub-catchment breakdowns where applicable; and
vii. Maintenance and management plan of the surface water drainage system (for the lifetime of the development) including details of future adoption.

The applicant should, as part of the surface water strategy, demonstrate that the requirements of any local surface water drainage planning policies have been met and the recommendations of the relevant Strategic Flood Risk Assessment and Surface Water Management Plan have been considered.

A phase one and two contaminated land investigation should be undertaken.

Plans for the site should demonstrate how leachate from the site and any flooding incidents will be managed and the local land quality protected.

Chapter 12: Geology, Hydrogeology and Contaminated Land

A phase one and two contaminated land investigation should be undertaken.

Plans for the site should demonstrate how leachate from the site and any flooding incidents will be managed and the local land quality protected.

Chapter 13: Climate Change

Policy Considerations

Table 13.1: The most relevant policy in the Cambridgeshire and Peterborough Minerals and Waste Core Strategy is Policy CS22 Climate Change. The requirements of the Policy are referred to, but the Policy number is not given.

Climate Change Considerations

The scoping report proposes that the design life of the plant is 40 years from opening in 2025. This implies a minimum of 15 years of operation past a Government 2050 target for reaching net-zero CO2e emissions.

In October 2019, Cambridgeshire County Council adopted an evidence base called Net-Zero Cambridgeshire by 2050. This report, developed by young researchers at Cambridge University Science and Policy Exchange (CUSPE) for the Council, has informed the development of our Draft Climate Change and Environment Strategy. This is currently out for consultation until 31st January 2020 and available to view on the embedded link. The CUSPE report identifies three key points relevant to your project:

- The carbon footprint for Cambridgeshire and Peterborough is 6.1million tonnes of CO2e per annum. These emissions must reduce overall to 0.6million tonnes by 2050 with the residual needing to be off-set.
- The carbon footprint of the waste management, commercial and industrial services are relevant to your project and must contribute to the net-zero CO2e target by 2050.
- Carbon capture and storage, increased capture of landfill and compost gas emissions and the requirement for waste transportation to be electrified (or hydrogen) to reduce emissions are interventions that could support emission reductions.

The scoping report focusses on the diversion of residual waste from landfill. This is important. However, a greater level of consideration should be afforded to increased rates of recycling, reusing and circular economy principles which will reduce the supply of materials for burning, rather than assuming that all of the residual waste that is currently sent to landfill will continue at the same rate over the next 40 years. This approach is supported by the recently released Resources and Waste Strategy which aims to reduce waste and increase recycling within the timescales proposed.

In the context of Climate Change and the wider environment, the carbon footprint of this project must be developed and be able to demonstrate net-zero CO2e by 2050 with credible plans to mitigate emissions and manage residual emissions through opportunities such as carbon capture and storage.

The EIA/ES should address whether there is a need for an Energy from Waste facility when other existing and developing technologies for reducing waste and generating energy more sustainably are accounted for and show that this demonstrated need outweighs any negative implications in terms of emissions (and the climate emergency) and identify how these implications will be addressed.

The EIA/ES should demonstrate the impact beyond the district boundaries.

On consideration of distance waste will travel, considerations should be made to where waste will be imported as this will increase the carbon footprint of the project. The project will then need to demonstrate how it will off-set these imported emissions from the additional waste, if this is required to maintain operation of the Energy from Waste plant. Furthermore, in future proofing the facility in instances where the waste is no longer available to fuel this energy project in the surrounding area, consideration of alternative fuel sources should also be explained, alongside any additional environmental implications that may come from such alternatives.

Chapter 14: Socio-Economics

Policy Considerations

Table 14.1: The broader socio-economic objectives of the adopted Cambridgeshire and Peterborough Minerals and Waste Core Strategy are addressed in Core Strategy Policy CS2 Strategic Vision and Objectives for Sustainable Waste Management Development, which are not reflected in this Chapter. Similar policies in the emerging Cambridgeshire and Peterborough Mineral and Waste Local Plan (Proposed Submission) include Policy 4: Providing for Waste Management, which is also omitted.

Socio Economic Considerations

Cambridgeshire County Council Public Health welcomes the approach to the inclusion of human health impacts in section 14 Socio Economics. The methodology proposed is supported, however under the local policy section Table 14.1 no mention is made of the Fenland Local Plan requirement to address health and wellbeing through a Health Impact Assessment. Policy LP2 "Policy LP2 – Facilitating Health and Wellbeing of Fenland Residents" of the adopted local plan requires "*For major developments, the Council will require a Health Impact Assessment (HIA) to be submitted with a planning application. Such an HIA will enable the applicant to demonstrate how this policy has been met. The HIA should be commensurate with the size of the scheme.*" Although not a statutory requirement to produce an HIA and not an application to be determined by either Cambridgeshire County Council or Fenland District Council, nonetheless it is good practice and an accepted approach to applications of this nature.

Similarly the Cambridgeshire and Peterborough Waste Local Plan proposed submission publication draft November 2019 Policy 1: Sustainable Development and Climate Change requires *"…..Proposals should, to a degree which is proportionate to the scale and nature of the scheme, set out how this will be achieved, such as:…… take into account any significant impacts on human health and wellbeing and on air quality;*". In addition Policy 18: Amenity Considerations requires: "*Proposals must ensure that the development proposed can be integrated effectively with existing or planned (i.e. Development Plan allocations or consented schemes) neighbouring development. New development must not result in unacceptable adverse impacts on the amenity of existing occupiers of any land or property, including: a. risk of harm to*

human health or safety;…. *Where there is the potential for any of the above impacts to occur, an assessment appropriate to the nature of that potential impact should be carried out, and submitted as part of the proposal, in order to establish, where appropriate, the need for, and deliverability of, any mitigation.*"

Some of the environmental impacts to human health will be addressed as part of the EIA/ES but many of the wellbeing and mental health aspects of human health may not, therefore Cambridgeshire County Council Public Health request the applicant to undertake and submit a Health Impact Assessment commensurate with the scale of the development as part of the application. There is a lot of overlap between EIA/ES and Health Impact Assessment (HIA); in fact the methodologies are very similar. The preferred option, is for the applicant to produce a combined HIA and EIA/ES (an Integrated Assessment (IA)), The scoping report does not mention Health Impact Assessment and therefore the implication is that the applicant does not intend to submit an HIA, if the applicant provides a separate HIA it will be acceptable as long as there is clear cross-referencing between the two documents. The applicant should be encouraged to discuss the HIA scoping with the Public Health teams at Cambridgeshire County Council and Norfolk County Council prior to submission.

The Technical Guidance quoted in paragraph 14.2.4 of the scoping report could also mention the "Health in Environmental Impact Assessment - A Primer for a Proportionate Approach (IEMA 2017)"
[redacted] which outlines five key principles that should underpin the coverage of population and human health within EIA.

The Summary of the Data Sources in paragraph 14.3.4 of the scoping report should include reference to local Joint Strategic Needs Assessments (JSNA)
[redacted], in particular the JSNA core data set and the Transport and Health JSNA. The data contained in these JSNA should form part of the baseline evidence base on human health to supplement health data already proposed as part of the EIA/ES.

The data used and quoted for the scoping report and hence the EIA/ES needs to be checked for accuracy e.g. the child health data quoted in paragraph 14.4.3 of the scoping report has quoted the wrong year for the data. The data of 20.9% of year 6 pupils in Fenland being obese is the 2018-19 figures not the 2019 figures as quoted.

The data on economy and employment in paragraph 14.4.5 of the scoping report needs to be taken in context, although Fenlands economic growth may have outstripped other regions in the UK it is still a deprived area using the IMDB profiles therefore economic growth alone gives an incomplete picture of the local economy.

The scope of the assessment in section 14.5 is supported, however the assessment should also include an assessment of the impact on mental health as well as physical health both during construction and operation.

Paragraph 14.5.9 of the scoping report proposes to scope out direct effects on tourism and recreation, although not a formal Right of Way the disused railway line maybe being used by local residents as an amenity, this needs to be ascertained and clarified before it is scoped out of the assessment.

The assessment methodology under paragraph 14.6.10 of the scoping report – Health needs to take a wider view of health rather than just Health Facilities. Energy from Waste plants often raise local concerns regarding health, as such the EIA/ES and/or the Health Impact assessment should consider the possible impacts on mental health of local residents and any additional pressure this may place on local primary and community health care services.

In summary the proposed scope and methodology is supported, however the EIA/ES should incorporate or be accompanied by a Health Impact Assessment (HIA) commensurate with the scale of the development and the scope of the HIA should be agreed with the Public Health Teams at Cambridgeshire and Norfolk County Councils. In addition the assessment of impacts on human health should include mental health.

Chapter 15: Major Accidents and Disasters

Policy Considerations

Table 15.1: Policy CS34 Protecting surrounding Uses of the adopted Cambridgeshire and Peterborough Minerals and Waste Core Strategy should be taken into account, as this requires that here would significant harm to the environment, human health or safety, land uses, and amenity.

Major Accidents and Disaster Considerations

The Health and Safety Executive will regulate safe operation from the site. On receipt of the EIA/ES, consultation with the HSE will be required.

Other Matters

The scoping survey for the EIA/ES has not addressed light pollution or pests (flies or vermin).

The EIA/ES will need to include a full light assessment to demonstrate the impact on receptors.

The EIA/ES should include design techniques that will manage pests.

Pollution Control and Dewatering during Construction

The applicant will need to set out in the ES how pollution will be avoided during the construction phase, this should include details of oil and chemical storage, and how run off of suspended solids will be prevented. If there is any dewatering during construction then the applicant may require a permit from the Environment Agency.

Lighting

When comparing the existing site and its lighting environment against the proposed development associated lighting requirements, by virtue of the nature, size and location of the proposals there will be an increase in the lighting levels on site, resulting in a change in the existing lighting environment witnessed off site. Detailed predictions of lighting levels will need to be made identifying potential impact on existing and future properties, including residential.

Cumulative Impact

The EIA/ES must consider the cumulative impact of development and this will need to be fully addressed, and more comprehensively than is proposed in the scoping report. There is a need to consider the cumulative impact and the potential effects of wider planned and planned for growth. This is particularly, but not exclusively, in the context of transport and the proposed A47 corridor improvements. Consideration should therefore be given to the movements associated with the transport of all waste (from local and more distant locations), and the potential cumulative impacts on the A47, and the A47/A1101 roundabout at West Meadowgate. Also, the cumulative impact of wider development e.g. proposed industrial and residential development at Wisbech which will also have an effect on the A47. The scope of cumulative assessment therefore needs to be widened to take account of wider planned and planned for growth.

Yours sincerely,

[redacted]

Emma Fitch (Miss)
Joint Interim Assistant Director,
Environment and Commercial.

EAST CAMBRIDGESHIRE DISTRICT COUNCIL
THE GRANGE, NUTHOLT LANE,
ELY, CAMBRIDGESHIRE CB7 4EE
Telephone: Ely (01353) 665555
DX41001 ELY
www.eastcambs.gov.uk

The Planning Inspectorate
FAO: Karen Wilkinson
EIA and Land Rights Advisor
Major Case Directorate
Temple Quay House
2 The Square
Bristol
BS1 6PN

This matter is being dealt with by:

Angela Briggs

Telephone: [redacted]
E-mail: [redacted]
My Ref: EXT/00008/19
Your ref EN010110-000004

Sent by Email

Date: 17th December 2019

Dear Ms Wilkinson

Re: Application by MVV Environment Ltd (the applicant) for an Order granting Development Consent for the Medworth Energy from Waste Combine Heat and Power Facility (the Proposed Development). Scoping Consultation.

Thank you for consulting East Cambridgeshire District Council regarding the information to be provided in an Environmental Statement for the above proposal in Wisbech. Given the significant distance from the East Cambridgeshire District Council area the Council does not have any comments or issues to be included in the Environmental Statement.

Yours sincerely

Angela Briggs
Planning Team Leader

Ms Karen Wilkinson
The Planning Inspectorate
Major Casework Directorate
Temple Quay House (2 The Square)
Temple Quay
Bristol
Avon
BS1 6PN

Our ref: AC/2019/129016/01-L01
Your ref: EN010110-000004

Date: 03 January 2020

Dear Ms Wilkinson

DEVELOPMENT CONSENT ORDER FOR THE MEDWORTH ENERGY FROM WASTE COMBINED HEAT AND POWER FACILITY – ENVIRONMENTAL IMPACT ASSESSMENT (EIA) SCOPING OPINION MVV ENVIRONMENT LTD ALGORES WAY WISBECH CAMBRIDGESHIRE

Thank you for your Environmental Impact Assessment (EIA) Scoping consultation letter of 5 December 2019.

Environment Agency position
We have reviewed the scoping report submitted and generally, we agree with the proposed scope of work and methods to be applied when carrying out the EIA.

We have provided advisory comments below regarding Flood Risk and Environmental Permitting to ensure that the Environmental Statement will appropriately address the environmental issues we consider are of most importance for this proposal.

Flood Risk
We are satisfied that the Scoping Report has identified the need for a detailed Flood Risk Assessment (FRA) to be submitted, and with the methods suggested.

As noted in the report, the area is located within flood zone 3 (high risk). The Environment Agency has modelled the watercourse in the vicinity of the proposed site. Please request Product 8 (Hazard Mapping) Flood Risk Assessment Data Information, by writing to Customers and Engagement, Ceres House, Searby Road, Lincoln, LN2 4DW or by email at LNenquiries@environment-agency.gov.uk .

Details of what the Flood Risk Assessment Data information products contain is available at https://www.gov.uk/guidance/flood-risk-assessment-for-planning-applications "Get information to complete an assessment".

Cont/d..

At this stage the Environment Agency has no further comments relating to flood risk, until such time as a detailed FRA is submitted (on the basis that this would fall into the category of Essential Infrastructure.

Environmental Permitting
We welcome paragraph 4.8.4 which identifies the requirement for an environmental permit and early engagement with the Environment Agency. It would be illegal to operate this facility without a permit being authorised. The Environment Agency has a pre-application service and we recommend that the applicant uses this service.

The link for that service is here
https://www.gov.uk/government/publications/environmental-permit-pre-application-advice-form

We hope that this information is of assistance to you. If you have any further queries please do not hesitate to contact us.

Yours sincerely

Elizabeth Mugova
Sustainable Places Planning Advisor
East Anglia Area

[redacted]

From:	ESP Utilities Group Ltd
To:	Medworth
Subject:	Your Reference: Medworth Our Reference: PE140219. Plant Not Affected Notice from ES Pipelines
Date:	05 December 2019 14:51:36

Medworth
The Planning Inspectorate

5 December 2019

Reference: Medworth

Dear Sir/Madam,

Thank you for your recent plant enquiry at: Medworth.

I can confirm that ESP Utilities Group Ltd has no gas or electricity apparatus in the vicinity of this site address and will not be affected by your proposed works.

ESP Utilities Group Ltd are continually laying new gas and electricity networks and this notification is valid for 90 days from the date of this letter. If your proposed works start after this period of time, please re-submit your enquiry.

Important Notice

Please be advised that any enquiries for ESP Connections Ltd, formerly known as British Gas Connections Ltd, should be sent directly to us at the address shown above or alternatively you can email us at: PlantResponses@espug.com

Yours faithfully,

Plant Protection Team
ESP Utilities Group Ltd

Bluebird House
Mole Business Park
Leatherhead
KT22 7BA
☎ 01372 587500 01372 377996

[redacted]

Fenland
CAMBRIDGESHIRE
Fenland District Council

100% people driven

Contact: Sheila Black
Development Services
[redacted]

The Planning Inspectorate
Major Casework Directorate
Temple Quay House
2 The Square
Bristol
BS1 6PN

Our ref: F/YR19/4024/LACON
Your ref: EN010110-000004

23 December 2019

Dear Sir or Madam

Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) – Regulations 10 and 11

Application by MVV Environment Ltd (the Applicant) for an Order granting Development Consent for the Medworth Energy from Waste Combined Heat and Power Facility – Scoping Consultation

I refer to your recent consultation regarding a scoping opinion and the information to be provided in an Environmental Statement relating to the above development. The table below lists the further information that Fenland District Council considers should be provided in the ES:

Chapter 1 – Introduction	• No comment.
Chapter 2 – Description of the proposed development	• Section 2.3.24 is concerned with the CHP connection and suggests that this will be located along the Bramley Line disused railway line. Further understanding of this is required including its impact relating to ongoing study work and local aspirations to bring the disused railway line back into use. • Paragraph 2.3.25 is noted for its statement that the proposed energy from waste combined heat and power facility will be capable of handling over 500,000 tonnes of residual waste per annum. It is suggested that this level of capacity could generate significant transport journeys. • The location of the proposed facility is bounded by key transport routes that are already congested due to high volumes of traffic. The traffic impacts of the proposed development will therefore need to be fully assessed. • Sections 2.3.44 – 2.3.47 considers the access improvements and suggests that such

	improvements would form part of the Development Consent Order (DCO). This comment is noted. Based on the proposed tonnage of residual waste and the congestion of current strategic transport routes within Wisbech, it is suggested that improvements to the transport network are needed to support this proposed development. There is a need to fully understand all the transport and traffic impacts and ensure that such appropriate mitigation is determined.
Chapter 3 – Planning Policy	• No comment.
Chapter 4 – Scope of the Assessment	• No comment.
Chapter 5 – Traffic and Transport	• The relevant national and local transport policies appear to have been listed • The relevant technical guidance has been listed • Sections 5.1 – 5.6 set out the proposed initial approaches for the work. All aspects of this approach require approval from Cambridgeshire County Council Transport Assessment Team before work commences • From the section 5.3 and 5.4 there seems to be a suggestion that all traffic to and from the development will be solely in an east or westerly direction. No consideration appears to have been given concerning journeys to and from the north of Wisbech. It is essential that further work is undertaken once the origins of the waste are known as mentioned in section 5.3.2. including a review of the baseline • References to the Wisbech Access Strategy and its specific schemes are welcomed along with the opportunity for further engagement about this ongoing transport work • Two other important transport work areas are the Wisbech Railway project and the A47 duelling proposals, both of which are being funded by the Combined Authority and delivered by Cambridgeshire County Council. It is noted that neither project is mentioned within the traffic and transport section, but it is considered that regard must be had to them. • The methodology for assessing the environmental effects to air quality from traffic and transport has been referred to in Chapter 7.5.8 and Chapter 7.5.27 of the EIA scoping survey. • The impacts from dust, odour and noise from vehicle movements on and off the site should be detailed when assessing the environmental effects from traffic and transport or when assessing air quality or noise. • The impact of vehicle movements on residents, businesses and educational facilities should be made clear. To divert 500,000 tonnes of waste to this facility, an

	estimated calculation has demonstrated this could result in an average of 110 to 150 vehicle movements a day. (Based on waste being transported in 25 tonne bulkers to the facility, with deliveries being accepted 5 to 7 days a week). • Any transport links, within the district, in addition to road haulage should also be detail in the report.
Chapter 6 – Noise and Vibration Policy Considerations – para. 6.2.2	• In addition to the receptors outlined in table 6.3, The Anglia Community Eye Service Clinic (32 Cromwell Road, Wisbech, PE14 0SN) should be considered. The clinic is approximately 350 metres from the proposed development. The clinic provides treatments, surgeries and uses sensitively calibrated equipment. In the submitted EIA, the clinic should be considered as a nearby highly sensitive receptor and the impact of noise, vibration and dust should be identified. • A construction and operational management plan should demonstrate how impacts to receptors will be controlled if found to be necessary. • On determining the baseline sound levels, local wind speed and direction data should also be provided within the weather reporting for the direction of monitoring periods. The impact of the wind direction on baseline sound levels by nearby dominant noise sources should be considered when demonstrating the typical background noise level. • The noise impact assessment made in line with BS 4142:2014 should include in the appendix; all raw date, identification of excluded data, calculations and assumptions. • Where the impact assessment identifies mitigation measures, these should be provided with attenuation calculations, and any assumptions made. • In line with the traffic and transport environmental impact assessment the noise impact assessment should include vehicle movements as well as operational equipment. • To include reference to Policy DM3 of Delivering and Protecting High Quality Environments in Fenland Supplementary Planning Document July 2014.
Chapter 7 – Air Quality	• It is noted that there are only limited mentions of traffic and transport within this chapter, whilst it is appreciated that transport is covered within a separate chapter, the transport effects on local air quality must be fully considered. • One of the Air Quality Management Areas (AQMA) along Churchill Road is associated to traffic congestion. This is a strategic road route into and out of Wisbech and links to the proposed study area. Further consideration needs to be given to the air quality impacts from a transport perspective, particularly given the suggestion that the site will be capable of handling over 500,000 tonnes of residual waste per annum. • The site will require an environmental permit regulated by the Environment Agency. The application process for the environmental permit may or may not be initiated

	until the planning processes has been finalised. The background air quality levels, operational monitoring requirements and target emission limits will be established within the Environmental Permit. • The adjacent industrial site has a number of different Environmental Permitted Sites (regulated by the EA and LA). The EIA should detail if the incinerator process will result in a cumulative impact on air quality. If a cumulative impact is identified, the EIA should detail how the existing permitted processes will be impacted on and any burdens it will place on them. • Wisbech has three Air Quality Management Areas (AQMA). As outlined in Fenland District Council's Air Quality Plan[1] evidence is being gathered to revoke two Wisbech air quality management areas relating to a historic combustion process that has been removed. The third Wisbech AQMA, is for NO_2 associated to traffic congestion on Churchill Road. As stated in section 7.4.7 of the scoping report, this AQMA has not been revoked. Data available does show that no exceedances of the annual mean have been identified. There is no continuous monitoring data available from this location to demonstrate that daily, eight hourly or hourly means have not been exceeded. In addition, transport plans in the region highlight increasing transport demands on the Wisbech main routes alongside current limited transport options. To revoke an AQMA a local authority must demonstrate that the risk of elevated pollution levels will not return to a location once the AQMA has been revoked. Working with transport development plans, a holistic solution is being developed to respond to increasing transport demands which will in turn improve the local air quality. The outcome of the Transport Plan actions will demonstrate if on revocation future concerns of elevated NO_2 levels can be addressed. • The EIA should consider the impact of the number and type of vehicle movements that the proposed development will have as well as the incineration process. The impact to the existing NO_2 AQMA should be considered. • The scoping report has identified a number of sources of data to establish estimated background pollutant concentrations. An EIA should demonstrate the impact of pollution concentrations if the development was operational. Real time monitoring of background pollution concentrations will be required and can be agreed. • All stack height calculations should be provided with raw data.
Chapter 8 – Landscape and Visual Para 8.3.1 Para 8.4.42	• Consideration of longer range potential impact views outside the 5km study area should be considered and scoped into the EIA to demonstrate whether there will be an significant visual impact from the height of the chimney stack and overall building height. • More views should be included from the west of Wisbech. • The area to the south of the site is identified in the scoping report as predominantly for business purposes, however the Local Plan allocation also has potential for around 100 dwellings and this should be referenced.
Chapter 9 – Historic Environment	• It is considered that the two bullet points should be scoped into the EIA and not out for the following reason:

Para. 9.5.5	For the avoidance of doubt and for clarity as to the exact impact of the proposed facility it would be expected that any future EIA does include reference to the Wisbech Conservation Area and listed buildings within the Wisbech Conservation Area and provides evidence of visual impact, or lack of, from these designated heritage assets. The scoping document makes reference to Viewpoints (VPs) and Zones of Theoretical Visibility (ZTV) but does not include a visual evidence base to actually back this up and allow impact to be fully understood. Wisbech Conservation Area is a conservation area that affords a very high heritage value and it is important the impact of this proposal on this conservation area is evidenced. In this respect the EIA should include this information. In two specific instances the grid connection corridor runs very close to listed buildings. Any future EIA will need to give full and specific consideration to the impact of the proposals on the setting of Austin Farmhouse, 4 Burrett Road (grade ii) List Entry No 1342384 and Greens Cottage, Folgate Lane (grade ii) List Entry No 1264180 and fully identify what grid connection infrastructure will be utilised in these localities and how this will impact on the setting of these listed buildings. Where other heritage assets, specifically listed buildings and conservation areas, occur within a 2Km radius the EIA should make proportionate reference to potential impact on the setting of these designate heritage assets. Identification of non-designated heritage assets (as defined by Annex 2 NPPF (Feb 2019)) will have to be account for where the grid connection corridor is running through or close to built environments such as at Walpole Highway, eastern edge of Walsoken, northern end of Elm and Emneth.
Chapter 10 – Biodiversity	<u>Ecological surveys</u> • Noting in section 10.5.5 that no ecological surveys have yet been carried out, it is important that the proposed Phase 1 surveys, to be followed by targeted ecological surveys, are carried out at the earliest opportunity to inform the EIA. • It is also noted that the extent of any such surveys will be discussed with relevant consultees, which is welcomed on the basis that Fenland District Council would be involved with such discussions. • Survey work should be undertaken in accordance with best practice standards. Any deviations should be robustly justified within the EIA. • In addition to the scope of habitats and species listed in Box 10.1, consideration should also be given to Species of Local Importance, including Cambridgeshire & Peterborough Additional Species of Interest and species on the vice-county 29 Rare Plant & Species of Conservation Concern registers. • It is important that the proposed survey work includes not only the main development site and grid connection but also any additional impacts relating to the scheme such as the proposed construction compound sites and any proposed above-ground cabling. • Ecological impacts relating to both the construction and operational phases should

	be fully assessed. • The EIA should demonstrate that the project has been developed using the Mitigation Hierarchy principles; any adverse impacts should be avoided in the first instance. If this is not possible, then adequately mitigation should be undertaken to lessen such impacts. Any residual impacts must be adequately compensated. <u>Designated Sites</u> • Potential effects on statutory designated biodiversity sites should also consider the impact of the proposal on functional land located beyond the designation boundary, such as the Goose and Swan Functional Land Impact Risk Zone associated with the Nene and Ouse Washes International Sites. • It is noted that section 10.5.4 states that Local Wildlife Site data will be requested from the Cambridgeshire & Peterborough Environmental Records Centre (CPERC); of particular note is the presence of the River Nene County Wildlife Site which is located in close proximity to the application site. Therefore any potential impacts to this site should be fully scoped and assessed. <u>Opportunities for Ecological Enhancement/Habitat Creation</u> • The scheme represents a good opportunity to create landscape-scale ecological enhancements and deliver against the Habitat Opportunities Map for Cambridgeshire and objectives of the Cambridgeshire Green Infrastructure Strategy, and should seek to deliver biodiversity net gain. • Habitat Opportunity Mapping data is available from CPERC and should therefore be sought to assist with prioritising opportunities for habitat creation in the local area.
Chapters 11 and 12 – Geology, Hydrogeology and Contaminated land	• A phase one and two contaminated land investigation should be undertaken. • Plans for the site should demonstrate how leachate from the site and any flooding incidents will be managed and the local land quality protected.
Chapter 13 – Climate Change	• The EIA should demonstrate the impact beyond the district boundaries. • On consideration of distance waste will travel, considerations should be made to where waste will be imported from if additional waste is required to maintain operation of the incinerator.
Chapter 14 – Socio-Economics	• No comment.
Chapter 15 – Major Accidents and Disasters	• The Health and Safety Executive will regulate safe operation from the site. On receipt of the EIA, consultation with the HSE will be required.
Additional	• The scoping survey for the EIA has not addressed light pollution or pests (flies or

Environmental Impacts to be considered	vermin). • The EIA will need to include a full light assessment to demonstrate the impact on receptors. • The EIA should include design techniques that will manage pests.

[1] Fenland District Council Air Quality Action Plan can be found at; https://www.fenland.gov.uk/airpollution

Yours faithfully

Nick Harding
Head of Planning Services

Data protection Act 1998
To provide you with our services we need to record personal information, such as your name and address. This information will be kept securely and only accessed by approved staff.

From:	Meakins, Corinne
To:	Medworth
Subject:	Forestry Commission response to EN010110-000004
Date:	09 December 2019 15:43:55
Attachments:	image002.png

Scoping consultation - Application by MVV Environment Ltd (the Applicant) for an Order granting Development Consent for the Medworth Energy from Waste Combined Heat and Power Facility (the Proposed Development)

To whom it may concern

I confirm that the Forestry Commission does not have any comments to make on this application.

Yours sincerely

[redacted]

Corinne Meakins
Local Partnership Advisor
Forestry Commission East and East Midlands Area
Santon Downham, Brandon
Suffolk. IP27 0TJ
[redacted]

[redacted]
www.gov.uk/forestrycommission
Please note my new shorter week working pattern is 8-4.30 pm Monday, Tuesday and Thursday.

From: FPL - Conx Request
To: Medworth
Subject: RE: EN011100 Medworth Energy from Waste Combined Heat and Power Facility EIA Scoping Notification and Consultation.
Date: 11 December 2019 08:31:32
Attachments: 9005066-proposal01-ngg-rev01.png

Good Morning Karen,

We have a gas network in the area of the proposed development (plan attached). Whilst we do not necessarily object to the development, please could you keep us updated with all updates on the project for instance when more detailed plans are released.

Many thanks,

SIMON WATTON | Gas Design Engineer
[redacted]
FULCRUM
Address: Fulcrum Pipelines, 2 Europa View, Sheffield Business Park, Sheffield, S9 1XH Tel: 03330 146 455

Fulcrum News:
Fulcrum strengthens its Electric Vehicle (EV) charging infrastructure operations with the appointment of industry specialist Alex Hinchcliffe. Read more
Fulcrum announce recentlys secured diverse mix of significant utility infrastructure contracts across the UK. Read more
Fulcrum hits major gas and electricity asset adoption milestone. Read more

From: Medworth <Medworth@planninginspectorate.gov.uk>
Sent: 05 December 2019 11:48
[redacted]
Subject: EN011100 Medworth Energy from Waste Combined Heat and Power Facility EIA Scoping Notification and Consultation.

Dear Sir/Madam

Please see attached correspondence on the proposed Medworth Energy from Waste Combined Heat and Power Facility.

Please note the deadline for consultation responses is Friday 3 January 2019 and is a statutory requirement that cannot be extended.

Regards

Karen

Karen Wilkinson
EIA and Land Rights Advisor
Major Casework Directorate
The Planning Inspectorate, Temple Quay House, Temple Quay, Bristol BS1 6PN

Twitter: @PINSgov
Helpline: 0303 444 5000
Email: Medworth@planninginspectorate.gov.uk

Web: https://infrastructure.planninginspectorate.gov.uk/ (National Infrastructure Planning)

VERY IMPORTANT - INFORMATION FOR CUSTOMER

TRENCH DEPTH GUIDELINES

All trenches to be in accordance with N.J.U.G. guidelines
MINIMUM DEPTHS OF COVER:-
MAINS: (a) Carriageway - 750mm (b) Other ground - 600mm
SERVICES: (a) >63mm - As above (b) <=63mm - 450mm
*All pipes laid in agricultural land - 1.1m

All ducts (if used) must conform to BS4962, Yellow in colour, convoluted and perforated.

VERY IMPORTANT - INFORMATION FOR CUSTOMER

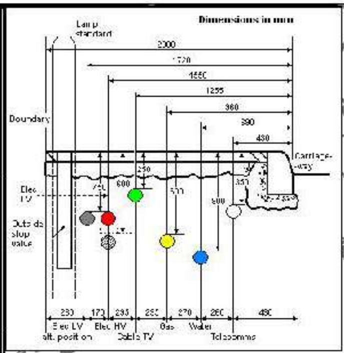
MINIMUM PROXIMITY DISTANCES

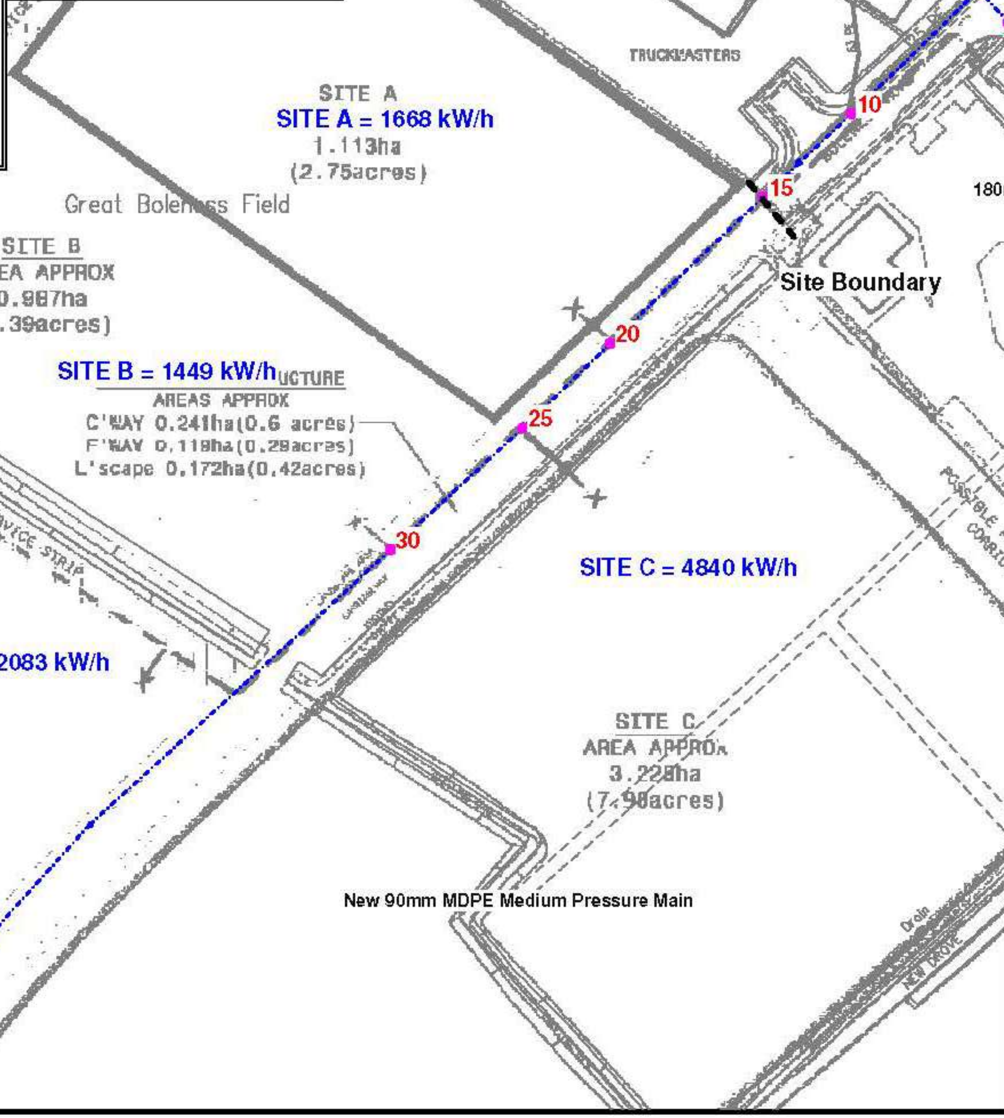
The permissible proximities to normally occupied buildings vary depending upon construction material and operating pressure shown in the tables below

STEEL MAINS

Operating Pressure	Minimum Proximity to Premises (m)
LP	0.25
MP	1
IP	3

PE MAINS	Material	Maximum Operating Pressure	
O.D (mm)	PE Grade	<=75mbar (LP)	>75mbar <=2bar (MP)
		Minimum Proximity to Premises (m)	
<=140	PE80 SDR17.6	0.25	3
	PE80 SDR11	0.25	3
	PE100 SDR11	0.25	3
160 to 250	PE80 SDR17.6	1	3
	PE80 SDR11	1	3
	PE100 SDR11	1	3
315	PE80 SDR17.6	1	3
	PE80 SDR11	1	3
	PE100 SDR11	1	3





GIRS ACCREDITED DESIGNER

DATE ______________________

SIGNATURE ______________________

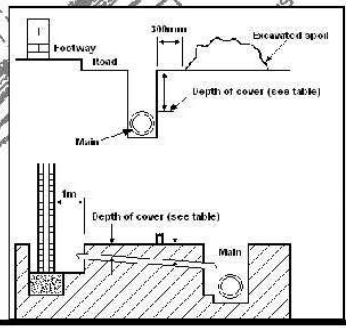
Fulcrum Pipelines
Greasbrough Road
Rotherham
S61 4QQ

QUOTE REF: 9005066

SITE ADDRESS:
Dev @
Bolness Road
Wisbech
Cambridgeshire

PE13 2RB

DESCRIPTION OF WORKS:
Lay approx 370 metres of suitable sized MDPE Medium Pressure Main. The main has been designed to provide the following loads :- Site A = 1668 kW/h, Site B = 1449 kW/h, Site C = 4840 kW/h, Site D = 2083 kW/h. Developer to provide all on-site excavations along the route specified by Fulcrum.



DESIGNED BY: Richard Collinson	
SCALE: 1:1250 @ A3	**DATE:** 23/09/08
DRAWING: E 545834 N 307840	

DRAWING KEY:
LP Main
MP Main
IP Main
Proposed Service
Proposed Meter Position
Pipes To Be Abandoned

Change Of Diameter	Governor
Change Of Material	Valve

From:	Karen Thorpe
To:	Medworth
Subject:	Medworth Energy from Waste Combined Heat & Power Facility
Date:	23 December 2019 11:52:39
Attachments:	image002.png

Good afternoon,

Planning Inspectorate Ref No.: EN010110-000004

Thank you for sending the relevant information and material regarding the Medworth Energy from Waste Combined Heat & Power Facility.

Harlaxton Energy Networks Ltd. at this time has no assets in the area, and will not be implementing any in the near future, therefore Harlaxton has no comment to make on this scheme.

Kind Regards

Karen Thorpe

0844 800 1813
Toll Bar Road, Marston, Grantham, Lincs, NG32 2HT

The office will be closing for the Christmas period on Monday 23rd December 2019 and re-opening on Thursday 2nd January 2020. During this period our emergency cover provisions will remain as usual.

For any electricity power issues please call our Emergency Line 0800 055 6288.
For any gas issues please call the National Gas Emergency Line 0800 111 999.

Harlaxton

Visit our website [redacted] and explore at your leisure

From:	Karen Thorpe
To:	Medworth
Subject:	Medworth Energy from Waste Combined Heat & Power Facility
Date:	23 December 2019 11:53:17
Attachments:	image002.png

Good afternoon,

Planning Inspectorate Ref No.: EN010110-000004

Thank you for sending the relevant information and material regarding the Medworth Energy from Waste Combined Heat & Power Facility.

Harlaxton Gas Networks Ltd. at this time has no assets in the area, and will not be implementing any in the near future, therefore Harlaxton has no comment to make on this scheme.

Kind Regards

Karen Thorpe

The office will be closing for the Christmas period on Monday 23rd December 2019 and re-opening on Thursday 2nd January 2020. During this period our emergency cover provisions will remain as usual.

For any electricity power issues please call Harlaxton Energy Networks 0800 055 6288.

For any gas issues please call the National Gas Emergency Line 0800 111 999.

0844 800 1813
Toll Bar Road, Marston, Grantham, Lincs, NG32 2HT

Harlaxton

Visit our website [redacted] and explore at your leisure

HSE

Health and Safety Executive

CEMHD Policy - Land Use Planning
NSIP Consultations
Building 1.2, Redgrave Court
Merton Road, Bootle
Merseyside L20 7HS

Your ref: EN010110
Our ref: 4.2.1.6672

HSE email: NSIP.applications@hse.gov.uk

FAO Karen Wilkinson
The Planning Inspectorate
Temple Quay House
Temple Quay,
Bristol
BS1 6PN

20 December 2019

Dear Karen

PROPOSED MEDWORTH ENERGY FROM WASTE COMBINED HEAT AND POWER FACILITY (the project)
PROPOSAL BY MVV Environment (the applicant)
INFRASTRUCTURE PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2017 (as amended) – Regulations 10 and 11

Thank you for your letter of 5 December 2019 regarding the information to be provided in an environmental statement relating to the above project. HSE does not comment on EIA Scoping Reports but the following information is likely to be useful to the applicant.

HSE's land use planning advice

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

According to HSE's records there is one major accident site and two major accident hazard pipelines within the indicated red line boundary for this nationally significant infrastructure project; as illustrated in, figure 1.1 'Red Line Boundary' as part of the document 'MVV Environment Ltd Medworth Energy from Waste Combined Heat and Power Facility EIA Scoping Report EIA Scoping report December 2019'

Major accident hazard site

1) HSE ref H4444; operated by H L HUTCHINSON LTD

Major accident hazard pipelines:

1) HSE ref 7463, operated by National Grid PLC; 4 Lings Lynn Comp / Wisbech Nene West
2) HSE ref 7458, operated by National Grid PLC; 2 Lings Lynn Comp / Wisbech Nene West

HSE's Land Use Planning advice would be dependent on the location of areas where people may be present. When we are consulted by the Applicant with further information under Section 42 of the Planning Act 2008, we can provide full advice

Hazardous Substance Consent

The presence of hazardous substances on, over or under land at or above set threshold quantities (Controlled Quantities) will probably require Hazardous Substances Consent (HSC) under the Planning (Hazardous Substances) Act 1990 as amended. The substances, alone or when aggregated with others for which HSC is required, and the associated Controlled Quantities, are set out in The Planning (Hazardous Substances) Regulations 2015 as amended.

HSC would be required to store or use any of the Named Hazardous Substances or Categories of Substances at or above the controlled quantities set out in Schedule 1 of these Regulations.

Further information on HSC should be sought from the relevant Hazardous Substances Authority.

Consideration of risk assessments

Regulation 5(4) of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 requires the assessment of significant effects to include, where relevant, the expected significant effects arising from the proposed development's vulnerability to major accidents. HSE's role on NSIPs is summarised in the following Advice Note 11 An Annex on the Planning Inspectorate's website - Annex G – The Health and Safety Executive. This document includes consideration of risk assessments on page 3.

Explosives sites

HSE has no comment to make in this regard, as there are no licensed explosive sites in the vicinity.

Electrical Safety

No comment, from a planning perspective.

Please send any further electronic communication on this project directly to the HSE's designated e-mail account for NSIP applications. Alternatively, any hard copy correspondence should be sent to:

Mr Dave Adams (MHPD)
NSIP Consultations
1.2 Redgrave Court
Merton Road
Bootle, Merseyside
L20 7HS

Yours sincerely

[redacted]

Dave Adams
CEMHD4 Policy

Our ref: F455079
Your ref: EN010110-000004

Mark Norman
Operations - East
Woodlands
Manton Lane
Bedford MK41 7LW

Direct Line: [redacted]

Major Casework Directorate,
Temple Quay House,
2 The Square,
Bristol,
BS1 6PN

16 December 2019

Dear Sir/Madam

TOWN AND COUNTRY PLANNING (DEVELOPMENT MANAGEMENT PROCEDURE) ORDER 2010
PLANNING APPLICATION: EN010110-000004
PROPOSAL: Scoping consultation and notification of the Applicant's contact details and duty to make available information to the Applicant if requested.
LOCATION: Fountain Frozen, Salters Way, Wisbech, Fenland, Cambridgeshire, PE14 0SH

Thank you for your correspondence, received on 5 December 2019, notifying Highways England of the above application.

We would expect a Transport Assessment carried out in accordance with current best practice and guidance. The scope of the Transport Assessment, should be agreed with both highway authorities (Cambridgeshire County Council and Highways England) before work is undertaken.

We look forward to working with the developer in due course.

Yours sincerely

Mark Norman
Spatial Planning Manager
Operations (East)
[redacted]

Marine Management Organisation

Marine Licensing
Lancaster House
Hampshire Court
Newcastle upon Tyne
NE4 7YH

T +44 (0)300 123 1032
F +44 (0)191 376 2681
www.gov.uk/mmo

Karen Wilkinson
The Planning Inspectorate
Temple Quay House
2 The Square
Bristol
BS1 6PN

Your reference: **EN010110-000004**
Our reference: **DCO/2019/00009**

By email only

19 December 2019

Dear Ms Wilkinson,

PLANNING ACT 2008 (AS AMENDED) AND THE INFRASTRUCTURE PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2017 (THE EIA REGULATIONS) – REGULATIONS 10 AND 11

Thank you for your letter dated 5 December 2019, notifying the Marine Management Organisation (the "MMO") of the proposed application by MVV Environment Ltd for an Order granting Development Consent for the proposed Medworth Energy from Waste Combined Heat and Power Facility.

The MMO's role in Nationally Significant Infrastructure Projects

The MMO was established by the Marine and Coastal Access Act 2009 (the "2009 Act") to make a contribution to sustainable development in the marine area and to promote clean, healthy, safe, productive and biologically diverse oceans and seas.

The responsibilities of the MMO include the licensing of construction works, deposits and removals in English inshore and offshore waters and Northern Irish offshore waters by way of a marine licence[1]. Inshore waters include any area which is submerged at mean high water spring ("MHWS") tide. They also include the waters of every estuary, river or channel where the tide flows at MHWS tide. Waters in areas which are closed permanently or intermittently by a lock or other artificial means against the regular action of the tide are included, where seawater flows into or out from the area.

[1] Under Part 4 of the 2009 Act

In the case of Nationally Significant Infrastructure Projects ("NSIPs"), the Planning Act (the "2008 Act") enables Development Consent Order's ("DCO") for projects which affect the marine environment to include provisions which deem marine licences[2].

As a prescribed consultee under the 2008 Act, the MMO advises developers during pre-application on those aspects of a project that may have an impact on the marine area or those who use it. In addition to considering the impacts of any construction, deposit or removal within the marine area, this also includes assessing any risks to human health, other legitimate uses of the sea and any potential impacts on the marine environment from terrestrial works.

Where a marine licence is deemed within a DCO, the MMO is the delivery body responsible for post-consent monitoring, variation, enforcement and revocation of provisions relating to the marine environment. As such, the MMO has a keen interest in ensuring that provisions drafted in a deemed marine licence ("DML") enable the MMO to fulfil these obligations.

Further information on licensable activities can be found on the MMO's website[3]. Further information on the interaction between the Planning Inspectorate and the MMO can be found in our joint advice note[4].

Medworth Energy from Waste Combined Heat and Power Facility

MVV Environment Ltd propose the development of an Energy from Waste Combined Heat and Power ("CHP") Facility, to recover useful energy in the form of electricity and steam from over half a million tonnes of non-recyclable (residual), non-hazardous Municipal and Commercial and Industrial waste each year, generating over 50 megawatts to be exported to the grid, and potentially up to 250 per hour of steam (heat) energy, located on land at Algores Way industrial estate, Wisbech, Cambridgeshire (the "Project").

The Project is located within the catchment of the River Nene, which is tidal at this location and flows in a north easterly direction, approximately 500m to the northwest of the Energy from Waste CHP Facility site.

The Environmental Impact Assessment ("EIA") Scoping Report prepared by Wood Environment and Infrastructure Solutions UK Limited dated December 2019, the Project includes a number of principle elements within the red line boundary:

- Energy from waste facility – Scoping Report figures 1.1 and 2.1 and 2.2 show this area to be entirely above MHWS.
- CHP connection – Scoping Report figures 1.1 and 2.4 show this area to be entirely above MHWS.
- Grid connection – Scoping Report figures 1.1 and 2.5 show this area to be entirely above MHWS.
- Access improvements – Scoping Report figures 1.1 and 2.4 show this area to be entirely above MHWS.

[2] Section 149A of the 2008 Act

[3] https://www.gov.uk/planning-development/marine-licences

[4] http://infrastructure.planningportal.gov.uk/wp-content/uploads/2013/04/Advice-note-11-v2.pdf

- Temporary construction compound (including potential additional land for a substation) – Scoping Report figures 1.1 and 2.3 show this area to be entirely above MHWS.

MMO Scoping Opinion

The MMO notes that the proposed development area for the Project is located approximately 500 meters from the River Nene, with no development proposed below MHWS. As such, a deemed marine licence will not be required. Should the requirement for works below MHWS change the MMO should be notified.

At this stage, a number of potential pathways appear to have been scoped in for further assessment through which the terrestrial works may indirectly affect the marine environment. As such, the MMO will continue to monitor the Project and should be consulted further.

Your feedback

We are committed to providing excellent customer service and continually improving our standards and we would be delighted to know what you thought of the service you have received from us. Please help us by taking a few minutes to complete the following short survey [redacted]

If you require any further information please do not hesitate to contact me using the details provided below.

Yours Sincerely,

[redacted]

Laura Calvert
Marine Licensing Case Officer
[redacted]

From:	Thomas Bulpit
To:	Medworth
Cc:	Helen Croxson; navigation safety
Subject:	MCA Response to Medworth Energy Facility Scoping Report
Date:	02 January 2020 15:05:07

FAO: Karen Wilkinson (Your ref: EN010110-000004)

Dear Ms Wilkinson,

Thank you for your letter dated 5th December 2019 and for the opportunity to comment on the Scoping Report prepared by MVV Environment Ltd, in respect of the proposed development to the Medworth Energy from Waste Combined Head and Power Facility.

The Maritime & Coastguard Agency's Navigation Safety Branch has an interest in the safety of navigation and maritime users, and to consider the potential risks posed by development work below the Mean High Water Springs, and potential impacts on the Search & Rescue operations of Her Majesty's Coastguard and MCA infrastructure.

We note that this proposed development takes place far inland but is near the River Nene, and therefore our scope is limited to whether there would be any potential impacts to this waterway. If any construction operations or movement of materials were to take place on the River we would expect the applicant to detail this within the Environmental Statement, including information on whether the responsible Navigation authority for the River had been consulted and what mitigation measures would be put in place to address potential impacts to navigation safety.

I hope that this is clear and I am more than happy to discuss this further if needed.

Best Regards,

Tom

Thomas Bulpit, Marine Licencing Lead
Navigation Safety Branch, DMSS
Maritime & Coastguard Agency
Spring Place, 105 Commercial Road, Southampton, SO15 1EG
[redacted]

Maritime & Coastguard Agency | HM Coastguard

Safer Lives, Safer Ships, Cleaner Seas

From: [redacted]
To: Medworth
Subject: Re: EN010110 Medworth Energy from Waste Combined Heat and Power Facility EIA Scoping Notification and Consultation
Date: 03 January 2020 10:17:16

Marshland St James Parish Council

[redacted]

Karen Wilkinson
Medworth@planning inspectorate

3 January 2020

Dear Karen

RE: SCOPING CONSULTATION REGARDING APPLICATION BY MVV ENVIRONMENTAL LTD FOR AN ORDER GRANTING DEVELOPMENT CONSENT FOR THE MEDWORTH ENERGY FROM WASTE COMBINED HEAT AND POWER FACILITY

Thank you for your letter of 5 December 2019.

The Parish Council has considered the matter and does not have any comments to make at this stage.

We look forward to receiving the consultation when the application for planning is made and at that stage we will submit our comments.

Regards

Miss Sarah Thorpe MAAT PSLCC
Clerk for Marshland St James Parish Council

Telephone: 01945 430930

You may request access to the information we hold on you by contacting us on clerkmarshlandstjames@aol.co.uk

You may request to be removed as a contact at any time by contacting us on clerkmarshlandstjames@aol.co.uk

To view Marshland St James Parish Council Privacy Notice please click on the link below
http://marshlandstjamespc.norfolkparishes.gov.uk/files/2018/05/Privacy-Notice.pdf

-----Original Message-----
[redacted]
Sent: Thu, 5 Dec 2019 15:15
Subject: EN010110 Medworth Energy from Waste Combined Heat and Power Facility EIA Scoping Notification and Consultation

Dear Sir/Madam

Please see attached correspondence on the proposed Medworth Energy from Waste Combined Heat and Power Facility.

Please note the deadline for consultation responses is Friday 3 January 2020 and is a statutory requirement that cannot be extended.

Please note that this email replaces that which was previously sent at 11.48am today.

Regards

Karen

Karen Wilkinson
EIA and Land Rights Advisor
Major Casework Directorate
The Planning Inspectorate, Temple Quay House, Temple Quay, Bristol BS1 6PN

Twitter: @PINSgov
Helpline: 0303 444 5000
Email: Medworth@planninginspectorate.gov.uk

Web: https://infrastructure.planninginspectorate.gov.uk/ (National Infrastructure Planning)

MIDDLE LEVEL COMMISSIONERS

Telephone: (01354) 653232
Fax. (01354) 659619
Email: engineers@middlelevel.gov.uk
enquiries@middlelevel.gov.uk
planningmatters@middlelevel.gov.uk

Website: www.middlelevel.gov.uk

MIDDLE LEVEL OFFICES
85 WHITTLESEY ROAD
MARCH, CAMBS. PE15 0AH

Clerk, Chief Engineer & Chief Executive
David C Thomas B.Eng, M.C.M.I.

Your Ref :

Our Ref : GM/332/PL/116 & 346/PL/1542
(Please quote this reference on any correspondence)

VIA EMAIL

20 December 2019

Dear Ms Wilkinson

Waldersey Internal Drainage Board + Hundred of Wisbech Internal Drainage Board

Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017(the EIA Regulations) – Regulations 10 and 11

Application by MVV Environment Ltd (the Applicant) for an Order granting Development Consent for the Medworth Energy from Waste Combined Heat and Power Facility (the Proposed Development)

Scoping consultation and notification of the Applicant's contact details and duty to make available information to the Applicant if requested

Thank you for your e-mail dated 5th December attaching a document associated with the above.

The Boards welcome the opportunity to be involved in the consultation at this early stage.

The contents of the EIA Scoping document have been considered and the Boards' comments are detailed below. Where the item being discussed in the report is not specifically relevant to the Boards but may be related to issues upon which it would like to make a remark the text is prefixed with the word "Comment".

(A) General

(i) *Risk Management Authorities*

The Middle Level Commissioners (the Commissioners) are a statutory water level and flood risk management and navigation authority responsible for the maintenance of major watercourses and associated structures within their catchment.

In addition to their statutory role, the Commissioners provide a planning consultancy service to the Internal Drainage Boards (the Boards) within and adjacent to their area. The Boards are autonomous water level and flood risk management authorities that obtain support from the Commissioners' staff and supervise drainage at a more local level.

The Commissioners and associated Boards are Risk Management Authorities (RMA), as identified by Defra.

The area covered by the "Red line" Plan includes the Hundred of Wisbech I.D.B. to whom we provide a planning service.

Together with various County/District/Borough Councils, Unitary Authorities and other stakeholders, the Commissioners are members of various Flood Risk Management Partnerships.

As members of such partnerships we would generally promote issues that improve water level management and reduce flood risk on our systems, in accordance with our respective policy statements.

(ii) *What is an Internal Drainage Board?*

Internal Drainage Boards (IDBs) are local public authorities that form an integral part of managing flood risk and water level management within areas of special drainage need. IDBs have permissive powers to undertake work to provide water level management within their District, sometimes also called the "rateable area", and undertake works to reduce flood risk to people and property and manage water levels for local needs.

To provide this service they maintain and improve watercourses; operate other assets, such as pumping stations and sluices; and facilitate new developments.

The more important ordinary watercourses within an IDB district are designated "Board's Drains" and are protected by the IDBs Byelaws.

IDBs also have statutory duties with regard to the environment and recreation when exercising their permissive powers.

(iii) *The Hundred of Wisbech IDB & Waldersey IDB*

The Hundred of Wisbech IDB has some 30km of Board's Drains and 3 water control structures. The Board's area extends to some 1,419 hectares and includes part of Wisbech, the villages of Elm and Friday Bridge and the hamlet of Begdale. It discharges by gravity into the adjoining Waldersey IDB.

The Waldersey IDB has some 27km of Board's Drains, 2 pumping stations and 2 other water control structures. The Board's area extends to some 2,137 hectares to the south of Wisbech, and provides the outfall from the adjacent Hundred of Wisbech IDB. Both pumping stations discharge into the tidal section of the River Nene.

Copies of the relevant Boards' District Plans are attached for your information/use.

(iv) *Other infrastructure developments in the Boards' areas*

Whilst not of direct consequence to the issue concerned, the Hundred of Wisbech IDB is also involved in the provision of other infrastructure projects that are aligned with the Wisbech 2020 and Wisbech Garden Town proposals some of which are being funded by the Cambridgeshire and Peterborough Combined Authority. These include the Wisbech Access Study and the March to Wisbech Transport Study which includes the Wisbech Rail Project.

The Board has expressed concern at the method in which these projects are currently being dealt with and requires that the parties involved are communicating efficiently with each other and acting together purposefully and effectively for the benefit of all "end users" including the ratepayer.

It is hoped that if this proposal proceeds it will follow such an approach.

(B) The Submission Document - Wood Environment & Infrastructure Solutions UK Limited
Doc Ref. 413-WOOD-ZZ-XX-RP-J-0001_S4_1 B198 December 2019

(i) The Hundred of Wisbech IDB

Based on the evidence that has been submitted, it is understood that the "power generation site" is that currently operated by Frimstone Ltd.

As can be seen from the attached copy of the Board's District Plan this site is surrounded and bisected by Board's Drains, shown dark blue, which are protected by its byelaws made under the Land Drainage Act (LDA).

It should be noted that the combined heat and power connection corridor along the route of the currently "mothballed" railway line to the north and the grid connection corridor to the east up to the A1101 are also within the Board's District.

Consent for works within, under or over the protected watercourses and the associated 9.0m wide maintenance access strip(s) require the Board's prior written consent.

The piping and filling of any watercourses within the Board's rateable area requires its prior written consent.

Contravention of both the Board's Byelaws and the Land Drainage Act 1991 (LDA) is a criminal offence which could lead to enforcement action being taken against the perpetrator.

(ii) Internal Consultation

The submission document has been the subject of an internal consultation with the relevant parties including the Hundred of Wisbech IDB. Not fully understanding the purpose of, and protocols associated with, a Scoping Opinion it was concerned about the lack of detail contained within aspects of the submission which prevented a detailed response being made.

(iii) Methodology

The methodology used appears to be quite detailed and appropriate to the type of development proposed. However, some minor discrepancies were noted in the text.

(iv) Chapter 5 Traffic and Transport (pages 39-50)

Comment – Reference is made within the text to the Southern Access Road that is included in the Wisbech Access Study proposals. Dependent upon the location of the proposed new railway station, proposed within the Wisbech Rail Project, a new junction, close to the location of New Bridge Lane, is currently being considered.

(v) Chapter 7 Air Quality (pages 67-88)

Comment – A problem experienced in other waste facilities adjacent to open watercourses has led to blockages as a result of wind-borne debris i.e. dust, plastic bags, paper products etc.

(vi) Chapter 10 Biodiversity (pages 121-134)

The Boards have nature conservation duties under the Land Drainage Act 1991, the Wildlife and Countryside Act 1981, the Protection of Badgers Act 1992, the Countryside and Rights of Way Act 2000, the Water Environment (Water Framework Directive) (England and Wales) Regulations 2003, the Eels (England and Wales) Regulations 2009, the Conservation of Habitats and Species Regulations 2010, the Flood and Water Management Act 2010, the Natural Environment and Rural Communities Act 2006, and as a competent authority under the Conservation (Natural Habitats etc) Regulations 1994.

Any works affecting a protected species and/or habitats should be undertaken at an appropriate time of year and under the supervision of suitably trained person(s) in accordance with appropriate guidance such as the Boards' BAPs and the Middle Level IDB Biodiversity Manual, the Association of Drainage Authorities (ADA)/Natural England Drainage Channel Biodiversity Manual and A Guide to Management Strategies and Mitigation Measures for Achieving Good Ecological Potential (GEP) in Fenland Waterbodies. These documents can be viewed or downloaded at the following respective web pages:

www.middlelevel.gov.uk/IDB-Biodiversity-Manual

[redacted]

[redacted]

According to the Boards' BAPs, which can be viewed on our website, there are no watercourses of biodiversity interest within the immediate area of the "energy generation site", primarily due to its urban location but protected species such as water voles and otters and their associated habitats are known to be located in the Board's system downstream of the site. It also advises that the section into which water is pumped into the River Nene, and downstream towards Wisbech, is a County Wildlife Site (CWS).

Any works affecting the Boards' systems, requiring their consent, or any works that affect any on-site open watercourses will, in general, require an Habitats and Species Risk Assessment & Action Plan (Environmental Assessment) and a Risk Impact Assessment identifying any adverse impacts on the existing habitats and species together with any proposed mitigation and opportunities to enhance habitats.

Our "Explanatory notes to be read in conjunction with application for consent for works in and around watercourses and consent validation form" (Explanatory Notes) document advises that any application for consent that does not properly consider this obligation will be **refused**.

Consultation during the planning process

It is considered that the applicant should make significant efforts to go beyond the requirement to consult with Natural England. There are many sites within the Fens which are not SSSI,

Ramsar, SPA or SACs but, nonetheless, are of local importance. Development has been delayed because of the relevant parties' failure to consult with all the relevant bodies.

(vii) Chapter 11 Hydrology (page 150)

The contents of this chapter appear to be comprehensive and cover most aspects. However, problems have been encountered in the past relating to works requiring the provision/amendment of road layouts and alignments, to accommodate the specialist haulage vehicles, and export cable routes, or similar, whether they are under or over ground. Whilst the point of connection has yet to be determined at least potential connection and the potential corridors have been included.

General guidance on the provision of a FRA/Drainage Strategy are detailed in section C below.

The proposals should also set out how they will be resilient to the changing climate, and must therefore include measures to:

- Minimise the risk of flood impacts
- Enhance water efficiency
- Adapt to the potential impacts of drought

Comment – Given the nature of the processes involved it is considered that there are potential opportunities in respect of rainwater capture and re-cycling which could benefit flood risk and water level management.

(viii) Chapter 12 Major Accidents and Disasters (pages 193-205)

Comment – There are several issues which give the Boards concern these primarily relate to adverse impacts on their systems including pollution and contamination during and following an "incident". However, these concerns relate to any urban development regardless of its use.

It is considered that issues relating to surface water disposal and flood risk can be mitigated against during the design process and will, presumably, be detailed within any FRA/Drainage Strategy submitted in support of an application.

(ix) Early Engagement and Better Design of Infrastructure

In accordance with best practice the Boards promote early consultation on Masterplans/Development Briefs/planning application etc that meet any of the following criteria:

- Being either within or adjacent to a Board's watercourse or asset, and/or any other flood defence structure.
- Being within the channel of any other Ordinary Watercourse.
- Where a direct discharge of surface water or treated effluent is proposed.
- For any development affecting more than one watercourse and having possible strategy implications in an area of known actual flood risk.
- Being within the maintenance access strips provided under the Byelaws.

- Any other application that, in the opinion of the Middle Level Commissioners' Chief Engineer, has material drainage implications.

Several pre-application consultation procedures are available and these are detailed on our "Pre- & Post-application consultation procedures" document. However, in view of the location of the site and the sensitive nature of the local water level and flood risk management systems the use of the detailed discussion procedure is considered essential.

This procedure is intended to guide all parties from the initial concept stage to the approval of flood risk and water level management and relevant environmental issues **prior** to applications being submitted. Therefore, increasing the likelihood of meeting the Boards' requirements, alleviating the need to oppose applications and discharge conditions and, ultimately, speeding up the associated processes and reducing costs.

In certain situations, as listed above, the Boards will require that a Flood Risk Assessment/Drainage Strategy has been supplied as part of an application. The Assessment must meet the minimum requirements of the NPPF, The District Council's SFRA, relevant aspects of the Pitt Report, which requires all sources of flooding to be considered, and the Board. It must advise whether there is any material prejudice to the Boards' systems, local flood risk and water level management systems, waterborne, natural or built environment. The Assessment **must** be supported by suitable adequate technical data and designs. Failure to do so could lead to the Boards opposing the applications concerned.

Ideally, the Flood Risk Assessment/Drainage Strategy should be submitted and checked by the Boards prior to any application being made.

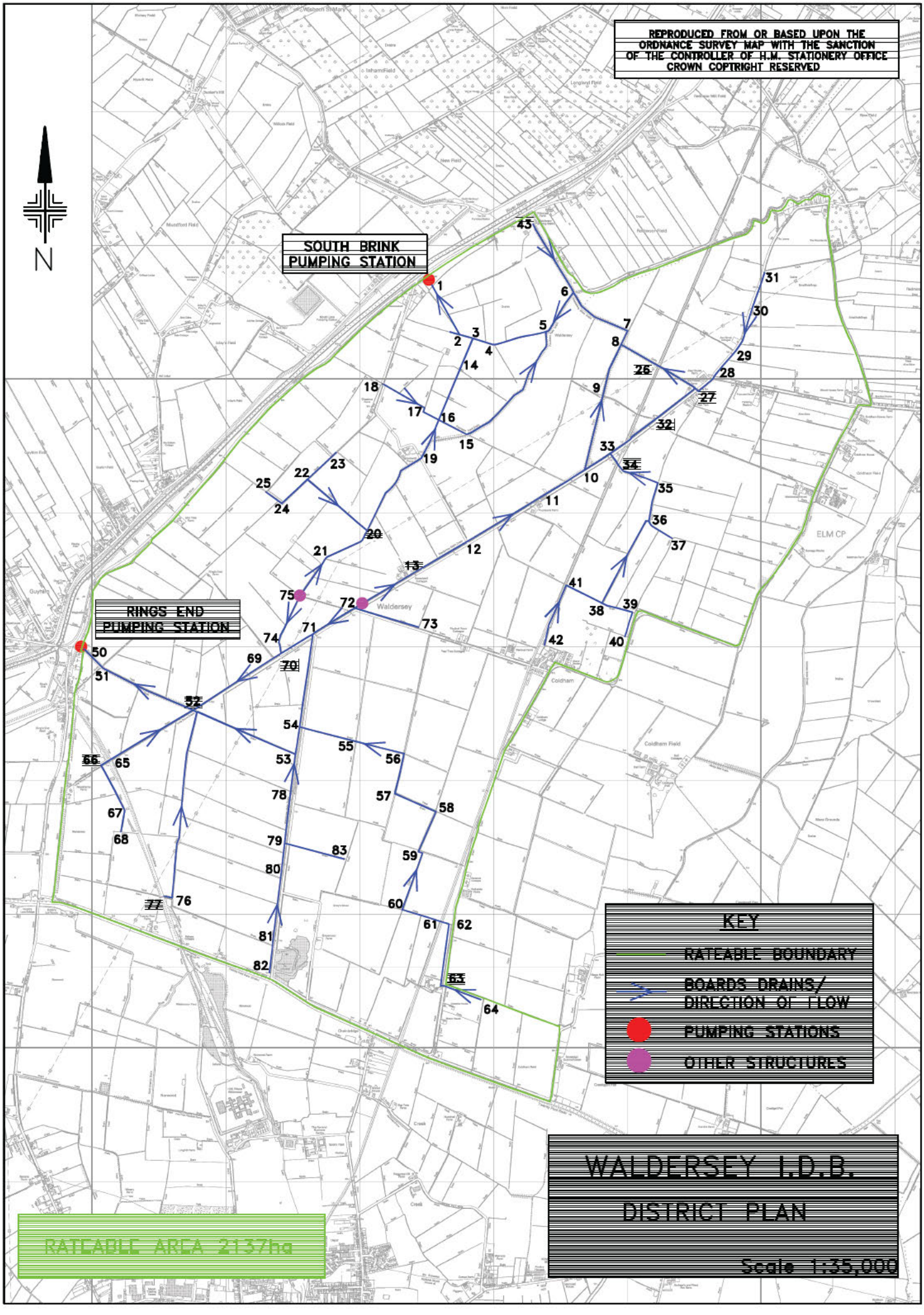
Any adverse impacts must be considered at the earliest possible stage.

Further details concerning development and any other related issues can initially be gained by referring to our 'Standard Advice relating to Development Management and Flood Risk Issues (January 2017)' and associated documents that can be viewed on our website at https://middlelevel.gov.uk/consents/

Yours sincerely

[redacted]

GRAHAM MOORE
Planning Engineer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OTHER STRUCTURES
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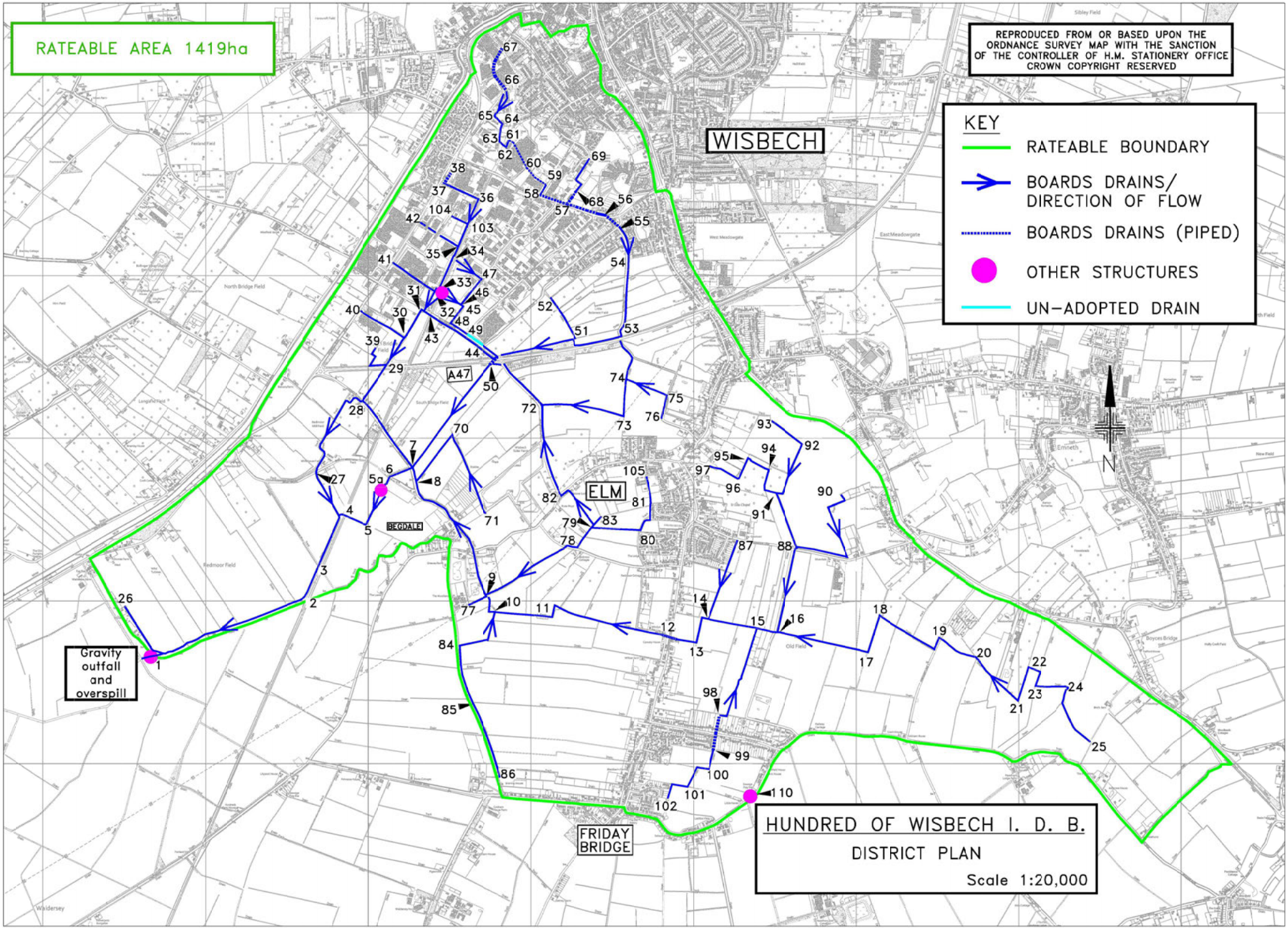
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OTHER STRUCTURES
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FRIDAY BRIDGE
BEGDALE
A47
Gravity outfall and overspill
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HUNDRED OF WISBECH I. D. B.
DISTRICT PLAN
Scale 1:20,000

Ministry of Defence

Defence Infrastructure Organisation

Safeguarding Department
Statutory & Offshore

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

[redacted]

[redacted]

Karen Wilkinson
The Planning Inspectorate
3/18 Eagle Wing
Temple Quay House
Temple Quay
Bristol
BS1 6PN

03 January 2020

Your reference: EN010110-000004
Our reference: DIO10047037

Dear Karen

MOD Safeguarding – SOSA (Site outside of statutory safeguarding areas)

Proposal:	Application by MVV Environment Ltd (the Applicant) for an Order granting Development Consent for the Medworth Energy from Waste Combined Heat and Power Facility (the Proposed Development) - 95m Flue Stack
Location:	Algores Way, Wisbech, Cambridgeshire.
Grid Ref:	545531, 307906

Thank you for consulting Defence Infrastructure Organisation (DIO) on the above proposed development. This application relates to a site outside of Ministry of Defence (MOD) statutory safeguarding areas (SOSA). We can therefore confirm that the MOD has no safeguarding objections to this proposal.

However, in the interests of air safety, the MOD requests that the structure is fitted with aviation warning lighting. The mast should be fitted with a minimum intensity 25 candela omni directional red flashing light or equivalent infra-red light fitted at the highest practicable point of the structure.

Whilst we have no safeguarding objections to this application, the height of the development will necessitate that aeronautical charts and mapping records are amended. DIO Safeguarding therefore requests that, as a condition of any planning permission granted, the developer must notify UK DVOF & Powerlines at the Defence Geographic Centre with the following information prior to development commencing:

a. Precise location of development.
b. Date of commencement of construction.
c. Date of completion of construction.

d. The height above ground level of the tallest structure.
e. The maximum extension height of any construction equipment.
f. Details of aviation warning lighting fitted to the structure(s)

You may e-mail this information to UK DVOF & Powerlines at: dvof@mod.gov.uk or post it to:

D-UKDVOF & Power Lines
Air Information Centre
Defence Geographic Centre
DGIA
Elmwood Avenue
Feltham
Middlesex
TW13 7AH

I trust this adequately explains our position on this matter, however should you have any questions regarding this matter please do not hesitate to contact me.

Yours sincerely

[redacted]

Teena Oulaghan
Safeguarding Manager
DIO Safeguarding Team

Na ional Grid house
Warwick Technology Park
Gallows Hill, Warwick
CV34 6DA

Land and Acquisitions
Anne Holdsworth
DCO Liaison Officer
Land and Property
[redacted]

SUBMITTED ELECTRONICALLY:
Medworth@planninginspectorate.gov.uk

16 December 2019

Dear Sir/Madam

APPLICATION BY MVV ENVIRONMENT LTD (THE APPLICANT) FOR AN ORDER GRANTING DEVELOPMENT CONSENT FOR THE MEDWORTH ENERGY FROM WASTE COMBINED HEAT AND POWER FACILITY (THE PROPOSED DEVELOPMENT)
SCOPING CONSULTATION

This is a response on behalf of National Grid Electricity Transmission PLC (NGET) and National Grid Gas PLC (NGG).

I refer to your letter dated 5th December 2019 in relation to the above proposed application. Having reviewed the scoping report, I would like to make the following comments:

National Grid infrastructure within / in close proximity to the order boundary

Electricity Transmission

National Grid Electricity Transmission has high voltage electricity overhead transmission lines and high voltage substations within the scoping area. The overhead lines and substations form an essential part of the electricity transmission network in England and Wales.

Substations

- Walpole 400kV Sub Station
- Walpole 132kV Sub Station
- Walpole 132kV GIS Sub station
- Associated overhead and underground apparatus including cables

Overhead Lines

- 4ZM 400kV Over Head Line
- 4VV 400kV Over Head Line
- Above and below ground associated apparatus

National Grid house
Warwick Technology Park
Gallows Hill, Warwick
CV34 6DA

Gas Transmission Infrastructure:

National Grid Gas has high pressure gas transmission pipelines located within or in close proximity to the proposed order limits. The transmission pipelines form an essential part of the gas transmission network in England, Wales and Scotland:

- Feeder Main 4 – Tilney High End to Wisbech Nene East
- Feeder Main 2 – Wisbech Winch to Wisbech Nene East
- Above and below ground associated apparatus

I enclose plans showing the route of National Grid's overhead lines, the Walpole substations, the gas transmission pipelines and associated gas apparatus.

Specific Comments – Electricity Infrastructure:

- National Grid's Overhead Line/s is protected by a Deed of Easement/Wayleave Agreement which provides full right of access to retain, maintain, repair and inspect our asset

- Statutory electrical safety clearances must be maintained at all times. Any proposed buildings must not be closer than 5.3m to the lowest conductor. National Grid recommends that no permanent structures are built directly beneath overhead lines. These distances are set out in EN 43 – 8 Technical Specification for "overhead line clearances Issue 3 (2004)

- If any changes in ground levels are proposed either beneath or in close proximity to our existing overhead lines then this would serve to reduce the safety clearances for such overhead lines. Safe clearances for existing overhead lines must be maintained in all circumstances.

- The relevant guidance in relation to working safely near to existing overhead lines is contained within the Health and Safety Executive's (www.hse.gov.uk) Guidance Note GS 6 "Avoidance of Danger from Overhead Electric Lines" and all relevant site staff should make sure that they are both aware of and understand this guidance.

- Plant, machinery, equipment, buildings or scaffolding should not encroach within 5.3 metres of any of our high voltage conductors when those conductors are under their worse conditions of maximum "sag" and "swing" and overhead line profile (maximum "sag" and "swing") drawings should be obtained using the contact details above.

- If a landscaping scheme is proposed as part of the proposal, we request that only slow and low growing species of trees and shrubs are planted beneath and adjacent to the existing overhead line to reduce the risk of growth to a height which compromises statutory safety clearances.

- Drilling or excavation works should not be undertaken if they have the potential to disturb or adversely affect the foundations or "pillars of support" of any existing tower. These foundations always extend beyond the base area of the existing tower and foundation ("pillar of support") drawings can be obtained using the contact details above.

National Grid house
Warwick Technology Park
Gallows Hill, Warwick
CV34 6DA

- National Grid Electricity Transmission high voltage underground cables are protected by a Deed of Grant; Easement; Wayleave Agreement or the provisions of the New Roads and Street Works Act. These provisions provide National Grid full right of access to retain, maintain, repair and inspect our assets. Hence we require that no permanent / temporary structures are to be built over our cables or within the easement strip. Any such proposals should be discussed and agreed with National Grid prior to any works taking place.

- Ground levels above our cables must not be altered in any way. Any alterations to the depth of our cables will subsequently alter the rating of the circuit and can compromise the reliability, efficiency and safety of our electricity network and requires consultation with National Grid prior to any such changes in both level and construction being implemented.

Gas Infrastructure

The following points should be taken into consideration:

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

Pipeline Crossings:

- Where existing roads cannot be used, construction traffic should ONLY cross the pipeline at previously agreed locations.

- The pipeline shall be protected, at the crossing points, by temporary rafts constructed at ground level. The third party shall review ground conditions, vehicle types and crossing frequencies to determine the type and construction of the raft required.

- The type of raft shall be agreed with National Grid prior to installation.

- No protective measures including the installation of concrete slab protection shall be installed over or near to the National Grid pipeline without the prior permission of National Grid.

- National Grid will need to agree the material, the dimensions and method of installation of the proposed protective measure.

- The method of installation shall be confirmed through the submission of a formal written method statement from the contractor to National Grid.

- Please be aware that written permission is required before any works commence within the National Grid easement strip.

- A National Grid representative shall monitor any works within close proximity to the pipeline to comply with National Grid specification T/SP/SSW22.

- A Deed of Consent is required for any crossing of the easement

National Grid house
Warwick Technology Park
Gallows Hill, Warwick
CV34 6DA

Cable Crossings:

- Cables may cross the pipeline at perpendicular angle to the pipeline i.e. 90 degrees.
- A National Grid representative shall supervise any cable crossing of a pipeline.
- Clearance must be at least 600mm above or below the pipeline.
- Impact protection slab should be laid between the cable and pipeline if cable crossing is above the pipeline.
- A Deed of Consent is required for any cable crossing the easement.
- Where a new service is to cross over the pipeline a clearance distance of 0.6 metres between the crown of the pipeline and underside of the service should be maintained. If this cannot be achieved the service shall cross below the pipeline with a clearance distance of 0.6 metres.

General Notes on Pipeline Safety:

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

Na ional Grid house
Warwick Technology Park
Gallows Hill, Warwick
CV34 6DA

To view the SSW22 Document, please use the link below:
[redacted].

To download a copy of the HSE Guidance HS(G)47, please use the following link:
http://www.hse.gov.uk/pubns/books/hsg47.htm

Further Advice

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

Where any diversion of apparatus may be required to facilitate a scheme, National Grid is unable to give any certainty with the regard to diversions until such time as adequate conceptual design studies have been undertaken by National Grid. Further information relating to this can be obtained by contacting the email address below.

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

National Grid requests to be consulted at the earliest stages to ensure that the most appropriate protective provisions are included within the DCO application to safeguard the integrity of our apparatus and to remove the requirement for objection. All consultations should be sent to the following email address: **box.landandacquisitions@nationalgrid.com**

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

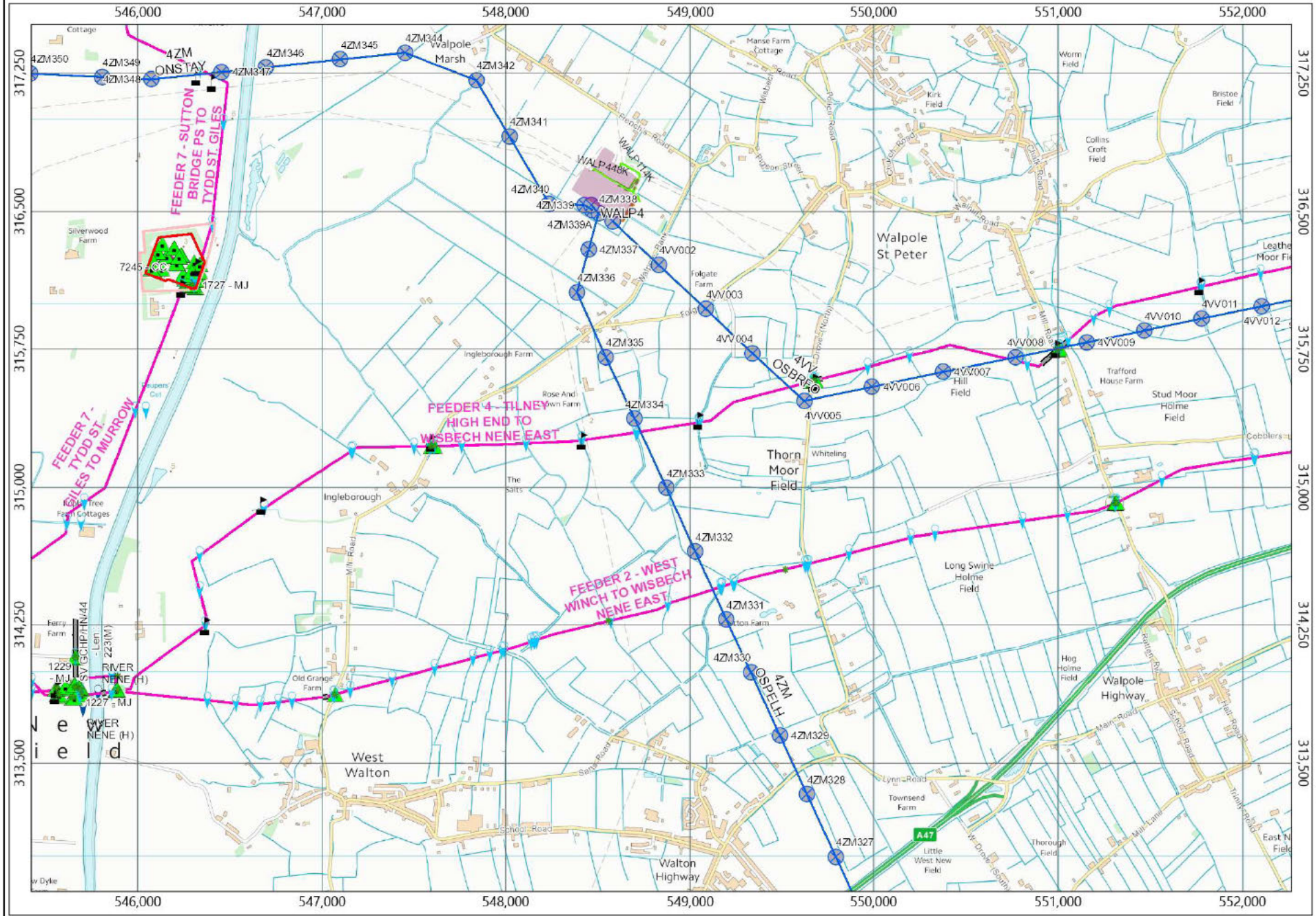
The information in this letter is provided not withstanding any discussions taking place in relation to connections with electricity or gas customer services.

Yours faithfully

[redacted]

Anne Holdsworth
DCO Liaison Officer, Land and Acquisitions

nationalgrid | Medworth NG Asset Plan 1



Legend:

- Substations Commissioned
- Circuits
  - Commissioned
  - Decommissioned Group
  - Planned and Spares
- OHL 400Kv Commissioned
- OHL 275Kv Commissioned
- OHL 132Kv & Below Commissioned
- Towers Commissioned
- Buried Cable Commissioned
- Fibre Cable Commissioned
- Pilot Cable
- Oil Pipe
- Cooling Pipe
- Cooling Station
- RAMM
- Cable Tunnel
- Gas Operational Boundary
- Gas Site Boundary
- Trial Hole
- Vantage Point
- Aerial Marker Post
- Pipe Crossing Point
- CP Test Post
- Transformer Rectifier
- Pipeline Crossing Sleeve
  - Nitrogen Sleeve
  - Other Sleeves
- Pipe Line Control Point
- Named Pipeline Section
- River Crossings

Notes:

Medworth NG Asset Plan 1

0 0.51 1.0 Kilometers

Date: 06/12/2019
Time: 16:15:05

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Print by: **Holdsworth, Anne**

nationalgrid | Medworth NG Asset Plan 2

Legend:

- Substations Commissioned
- Circuits
  - Commissioned
  - Decommissioned Group
  - Planned and Spares
- OHL 400Kv Commissioned
- OHL 275Kv Commissioned
- OHL 132Kv & Below Commissioned
- Towers Commissioned
- Buried Cable Commissioned
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- Vantage Point
- Aerial Marker Post
- Pipe Crossing Point
- CP Test Post
- Transformer Rectifier
- Pipeline Crossing
- Sleeve
  - Nitrogen Sleeve
  - Other Sleeves
- Pipe Line Control Point
- Named Pipeline Section
- River Crossings

Notes:

Medworth NG Asset Plan 2

0 0.51 1.0 Kilometers

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Time: 16:17:29

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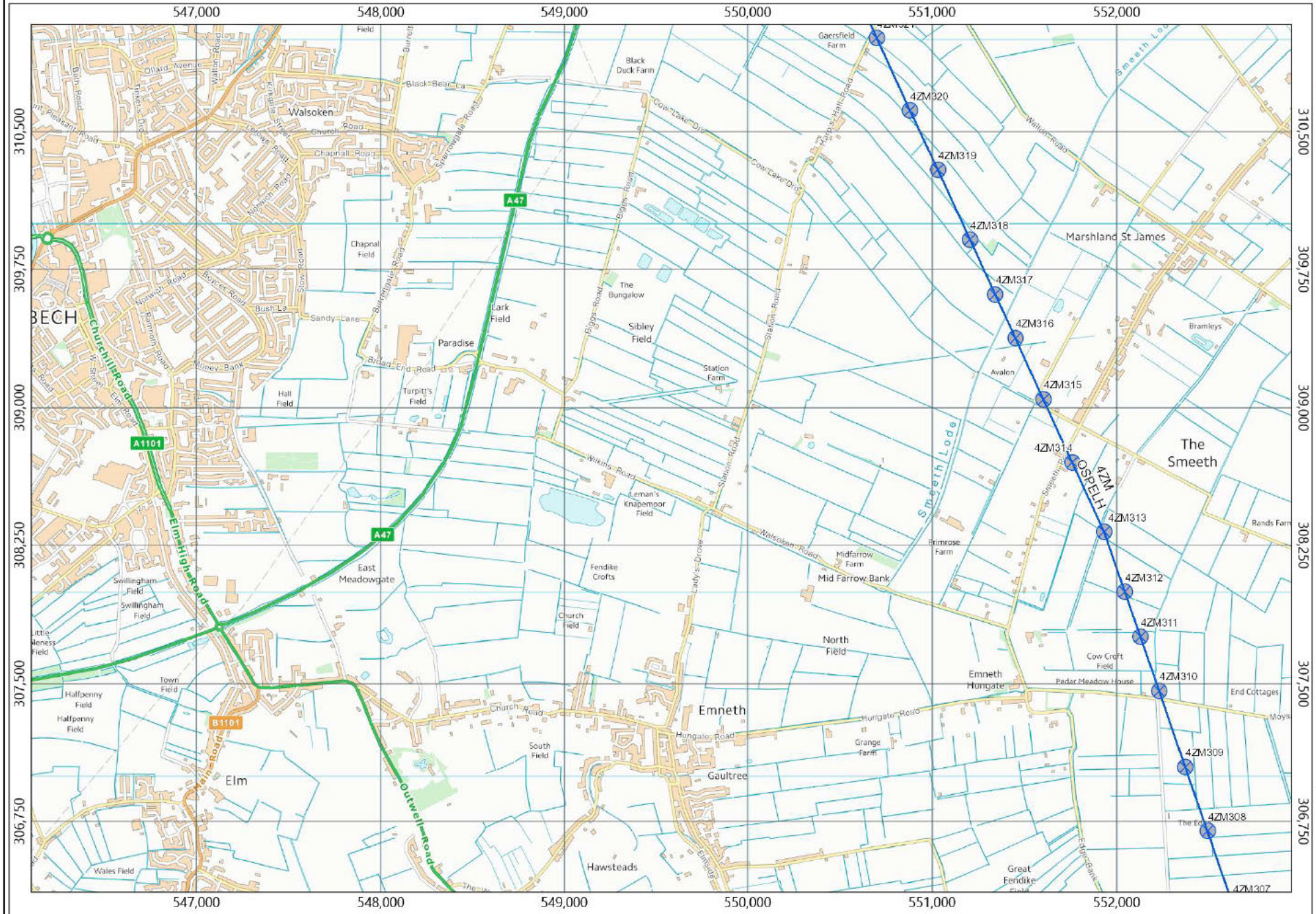
Print by: **Holdsworth, Anne**

nationalgrid | Medworth NG Asset Plan 3



Legend:

- Substations Commissioned
- Circuits
  - Commissioned
  - Decommissioned Group
  - Planned and Spares
- OHL 400Kv Commissioned
- OHL 275Kv Commissioned
- OHL 132Kv & Below Commissioned
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  - Other Sleeves
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- River Crossings

Notes:

Medworth NG Asset Plan 3

0 0.51 1.0 Kilometers

Date: 06/12/2019
Time: 16:32:27

Page size: A3 Landscape Scale: 1: 20,000
Print by: **Holdsworth, Anne**

From:	NATS Safeguarding
To:	Medworth
Cc:	NATS Safeguarding
Subject:	RE: EN011100 Medworth Energy from Waste Combined Heat and Power Facility EIA Scoping Notification and Consultation. (SG29105)
Date:	11 December 2019 11:22:45
Attachments:	image005.png image012.png image013.png image014.png image015.png image016.png

Dear Sir/Madam

The proposed development has been examined from a technical safeguarding aspect and does not conflict with our safeguarding criteria. Accordingly, NATS (En Route) Public Limited Company ("NERL") has no safeguarding objection to the proposal.

However, please be aware that this response applies specifically to the above consultation and only reflects the position of NATS (that is responsible for the management of en route air traffic) based on the information supplied at the time of this application. This letter does not provide any indication of the position of any other party, whether they be an airport, airspace user or otherwise. It remains your responsibility to ensure that all the appropriate consultees are properly consulted.

If any changes are proposed to the information supplied to NATS in regard to this application which become the basis of a revised, amended or further application for approval, then as a statutory consultee NERL requires that it be further consulted on any such changes prior to any planning permission or any consent being granted.

Yours faithfully

NATS Safeguarding

E: natssafeguarding@nats.co.uk

4000 Parkway, Whiteley,
Fareham, Hants PO15 7FL
[redacted]

From: Medworth <Medworth@planninginspectorate.gov.uk>
Sent: 05 December 2019 11:52

[redacted]

[redacted]

Subject: EN011100 Medworth Energy from Waste Combined Heat and Power Facility EIA Scoping Notification and Consultation.

Dear Sir/Madam

Please see attached correspondence on the proposed Medworth Energy from Waste Combined Heat and Power Facility.

Please note the deadline for consultation responses is Friday 3 January 2020 and is a statutory requirement that cannot be extended.

Regards

Karen

Karen Wilkinson
EIA and Land Rights Advisor
Major Casework Directorate
The Planning Inspectorate, Temple Quay House, Temple Quay, Bristol BS1 6PN

Twitter: @PINSgov
Helpline: 0303 444 5000
Email: Medworth@planninginspectorate.gov.uk

Web: https://infrastructure.planninginspectorate.gov.uk/ (National Infrastructure Planning)

Date: 20 December 2019
Our ref: 302648
Your ref: EN010110-000004

Karen Wilkinson
Medworth@planninginspectorate.gov.uk

BY EMAIL ONLY

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

T 0300 060 3900

Dear Ms Wilkinson

Environmental Impact Assessment Scoping consultation (Regulation 15 (4) of the EIA Regulations 2017): Application by MVV Environment Ltd (the Applicant) for an Order granting Development Consent for the Medworth Energy from Waste Combined Heat and Power Facility (the Proposed Development)
Location: Algores Way, Wisbech, Cambridgeshire

Thank you for seeking our advice on the scope of the Environmental Statement (ES) in your consultation dated and received on 05 December 2019.

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

Case law[1] and guidance[2] has stressed the need for a full set of environmental information to be available for consideration prior to a decision being taken on whether or not to grant planning permission. Annex A to this letter provides Natural England's advice on the scope of the Environmental Impact Assessment (EIA) for this development.

Should the proposal be amended in a way which significantly affects its impact on the natural environment then, in accordance with Section 4 of the Natural Environment and Rural Communities Act 2006, Natural England should be consulted again.

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us. For any queries relating to the specific advice in this letter only please contact Kayleigh Cheese on [redacted]. For any new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.

Yours sincerely

Kayleigh Cheese
Local Delivery Team

[1] Harrison, J in *R. v. Cornwall County Council ex parte Hardy* (2001)
[2] *Note on Environmental Impact Assessment Directive for Local Planning* Authorities Office of the Deputy Prime Minister (April 2004) available from http://webarchive.nationalarchives.gov.uk/+/http://www.communities.gov.uk/planningandbuilding/planning/sustainabilityenvironmental/environmentalimpactassessment/noteenvironmental/

Annex A – Advice related to EIA Scoping Requirements

1. General Principles

Schedule 4 of the Town & Country Planning (Environmental Impact Assessment) Regulations 2017, sets out the necessary information to assess impacts on the natural environment to be included in an ES, specifically:

- A description of the development – including physical characteristics and the full land use requirements of the site during construction and operational phases.
- Expected residues and emissions (water, air and soil pollution, noise, vibration, light, heat, radiation, etc.) resulting from the operation of the proposed development.
- An assessment of alternatives and clear reasoning as to why the preferred option has been chosen.
- A description of the aspects of the environment likely to be significantly affected by the development, including, in particular, population, fauna, flora, soil, water, air, climatic factors, material assets, including the architectural and archaeological heritage, landscape and the interrelationship between the above factors.
- A description of the likely significant effects of the development on the environment – this should cover direct effects but also any indirect, secondary, cumulative, short, medium and long term, permanent and temporary, positive and negative effects. Effects should relate to the existence of the development, the use of natural resources and the emissions from pollutants. This should also include a description of the forecasting methods to predict the likely effects on the environment.
- A description of the measures envisaged to prevent, reduce and where possible offset any significant adverse effects on the environment.
- A non-technical summary of the information.
- An indication of any difficulties (technical deficiencies or lack of know-how) encountered by the applicant in compiling the required information.

It will be important for any assessment to consider the potential cumulative effects of this proposal, including all supporting infrastructure, with other similar proposals and a thorough assessment of the 'in combination' effects of the proposed development with any existing developments and current applications. A full consideration of the implications of the whole scheme should be included in the ES. All supporting infrastructure should be included within the assessment.

2. Biodiversity and Geology

2.1 Ecological Aspects of an Environmental Statement

Natural England advises that the potential impact of the proposal upon features of nature conservation interest and opportunities for habitat creation/enhancement should be included within this assessment in accordance with appropriate guidance on such matters. Guidelines for Ecological Impact Assessment (EcIA) have been developed by the Chartered Institute of Ecology and Environmental Management (CIEEM) and are available on their website.

EcIA is the process of identifying, quantifying and evaluating the potential impacts of defined actions on ecosystems or their components. EcIA may be carried out as part of the EIA process or to support other forms of environmental assessment or appraisal.

The National Planning Policy Framework sets out guidance in S.174-177 on how to take account of biodiversity interests in planning decisions and the framework that local authorities should provide to assist developers.

2.2 Internationally and Nationally Designated Sites

The ES should thoroughly assess the potential for the proposal to affect designated sites. European sites (e.g. designated Special Areas of Conservation and Special Protection Areas) fall within the scope of the Conservation of Habitats and Species Regulations 2017 (as amended). In addition paragraph 176 of the National Planning Policy Framework requires that potential Special Protection Areas, possible Special Areas of Conservation, listed or proposed Ramsar sites, and any site identified as being necessary to compensate for adverse impacts on classified, potential or

possible SPAs, SACs and Ramsar sites be treated in the same way as classified sites.
Under Regulation 63 of the Conservation of Habitats and Species Regulations 2017 (as amended) an appropriate assessment needs to be undertaken in respect of any plan or project which is (a) likely to have a significant effect on a European site (either alone or in combination with other plans or projects) and (b) not directly connected with or necessary to the management of the site.

Should a Likely Significant Effect on a European/Internationally designated site be identified or be uncertain, the competent authority (in this case the Local Planning Authority) may need to prepare an Appropriate Assessment, in addition to consideration of impacts through the EIA process.

Sites of Special Scientific Interest (SSSIs) and sites of European or international importance (Special Areas of Conservation, Special Protection Areas and Ramsar sites)
The development site triggers the impact risk zone for combustion for the following designated nature conservation site:

- Nene Washes SAC, SPA, RAMSAR & SSSI

- Further information on the SSSI and its special interest features can be found at www.magic.gov . The Environmental Statement should include a full assessment of the direct and indirect effects of the development on the features of special interest within this and should identify such mitigation measures as may be required in order to avoid, minimise or reduce any adverse significant effects.

- - European site conservation objectives are available on our internet site [redacted]

2.3 Regionally and Locally Important Sites
The EIA will need to consider any impacts upon local wildlife and geological sites. Local Sites are identified by the local wildlife trust, geoconservation group or a local forum established for the purposes of identifying and selecting local sites. They are of county importance for wildlife or geodiversity. The Environmental Statement should therefore include an assessment of the likely impacts on the wildlife and geodiversity interests of such sites. The assessment should include proposals for mitigation of any impacts and if appropriate, compensation measures. Contact the local wildlife trust, geoconservation group or local sites body in this area for further information.

2.4 Protected Species - Species protected by the Wildlife and Countryside Act 1981 (as amended) and by the Conservation of Habitats and Species Regulations 2017 (as amended)
The ES should assess the impact of all phases of the proposal on protected species (including, for example, great crested newts, reptiles, birds, water voles, badgers and bats). Natural England does not hold comprehensive information regarding the locations of species protected by law, but advises on the procedures and legislation relevant to such species. Records of protected species should be sought from appropriate local biological record centres, nature conservation organisations, groups and individuals; and consideration should be given to the wider context of the site for example in terms of habitat linkages and protected species populations in the wider area, to assist in the impact assessment.

The conservation of species protected by law is explained in Part IV and Annex A of Government Circular 06/2005 *Biodiversity and Geological Conservation: Statutory Obligations and their Impact within the Planning System*. The area likely to be affected by the proposal should be thoroughly surveyed by competent ecologists at appropriate times of year for relevant species and the survey results, impact assessments and appropriate accompanying mitigation strategies included as part of the ES.

In order to provide this information there may be a requirement for a survey at a particular time of year. Surveys should always be carried out in optimal survey time periods and to current guidance by suitably qualified and where necessary, licensed, consultants. Natural England has adopted standing advice for protected species which includes links to guidance on survey and mitigation.

2.5 Habitats and Species of Principal Importance

The ES should thoroughly assess the impact of the proposals on habitats and/or species listed as 'Habitats and Species of Principal Importance' within the England Biodiversity List, published under the requirements of S41 of the Natural Environment and Rural Communities (NERC) Act 2006. Section 40 of the NERC Act 2006 places a general duty on all public authorities, including local planning authorities, to conserve and enhance biodiversity. Further information on this duty is available here https://www.gov.uk/guidance/biodiversity-duty-public-authority-duty-to-have-regard-to-conserving-biodiversity.

Government Circular 06/2005 states that Biodiversity Action Plan (BAP) species and habitats, 'are capable of being a material consideration…in the making of planning decisions'. Natural England therefore advises that survey, impact assessment and mitigation proposals for Habitats and Species of Principal Importance should be included in the ES. Consideration should also be given to those species and habitats included in the relevant Local BAP.

Natural England advises that a habitat survey (equivalent to Phase 2) is carried out on the site, in order to identify any important habitats present. In addition, ornithological, botanical and invertebrate surveys should be carried out at appropriate times in the year, to establish whether any scarce or priority species are present. The Environmental Statement should include details of:

- Any historical data for the site affected by the proposal (e.g. from previous surveys);
- Additional surveys carried out as part of this proposal;
- The habitats and species present;
- The status of these habitats and species (e.g. whether priority species or habitat);
- The direct and indirect effects of the development upon those habitats and species;
- Full details of any mitigation or compensation that might be required.

The development should seek if possible to avoid adverse impact on sensitive areas for wildlife within the site, and if possible provide opportunities for overall wildlife gain.

The record centre for the relevant Local Authorities should be able to provide the relevant information on the location and type of priority habitat for the area under consideration.

2.6 Contacts for Local Records

Natural England does not hold local information on local sites, local landscape character and local or national biodiversity priority habitats and species. We recommend that you seek further information from the appropriate bodies (which may include the local records centre, the local wildlife trust, local geoconservation group or other recording society and a local landscape characterisation document).

3. Landscape Character

Landscape and visual impacts

Natural England would wish to see details of local landscape character areas mapped at a scale appropriate to the development site as well as any relevant management plans or strategies pertaining to the area. The EIA should include assessments of visual effects on the surrounding area and landscape together with any physical effects of the development, such as changes in topography.

The EIA should include a full assessment of the potential impacts of the development on local landscape character using landscape assessment methodologies. We encourage the use of Landscape Character Assessment (LCA), based on the good practice guidelines produced jointly by the Landscape Institute and Institute of Environmental Assessment in 2013. LCA provides a sound basis for guiding, informing and understanding the ability of any location to accommodate change and to make positive proposals for conserving, enhancing or regenerating character, as detailed proposals are developed.

Natural England supports the publication *Guidelines for Landscape and Visual Impact Assessment*, produced by the Landscape Institute and the Institute of Environmental Assessment and

Management in 2013 (3rd edition). The methodology set out is almost universally used for landscape and visual impact assessment.

In order to foster high quality development that respects, maintains, or enhances, local landscape character and distinctiveness, Natural England encourages all new development to consider the character and distinctiveness of the area, with the siting and design of the proposed development reflecting local design characteristics and, wherever possible, using local materials. The Environmental Impact Assessment process should detail the measures to be taken to ensure the building design will be of a high standard, as well as detail of layout alternatives together with justification of the selected option in terms of landscape impact and benefit.

The assessment should also include the cumulative effect of the development with other relevant existing or proposed developments in the area. In this context Natural England advises that the cumulative impact assessment should include other proposals currently at Scoping stage. Due to the overlapping timescale of their progress through the planning system, cumulative impact of the proposed development with those proposals currently at Scoping stage would be likely to be a material consideration at the time of determination of the planning application.

The assessment should refer to the relevant National Character Areas which can be found on our website. Links for Landscape Character Assessment at a local level are also available on the same page.

Heritage Landscapes
You should consider whether there is land in the area affected by the development which qualifies for conditional exemption from capital taxes on the grounds of outstanding scenic, scientific or historic interest. An up-to-date list may be obtained at www.hmrc.gov.uk/heritage/lbsearch.htm.

4. Access and Recreation
Natural England encourages any proposal to incorporate measures to help encourage people to access the countryside for quiet enjoyment. Measures such as reinstating existing footpaths together with the creation of new footpaths and bridleways are to be encouraged. Links to other green networks and, where appropriate, urban fringe areas should also be explored to help promote the creation of wider green infrastructure. Relevant aspects of local authority green infrastructure strategies should be incorporated where appropriate.

Rights of Way, Access land, Coastal access and National Trails
The EIA should consider potential impacts on access land, public open land, rights of way and coastal access routes in the vicinity of the development. We also recommend reference to the relevant Right of Way Improvement Plans (ROWIP) to identify public rights of way within or adjacent to the proposed site that should be maintained or enhanced.

5. Soil and Agricultural Land Quality
Impacts from the development should be considered in light of the Government's policy for the protection of the best and most versatile (BMV) agricultural land as set out in paragraph 170 of the NPPF. We also recommend that soils should be considered in the context of the sustainable use of land and the ecosystem services they provide as a natural resource, as also highlighted in paragraph 170 of the NPPF.

6. Air Quality
Air quality in the UK has improved over recent decades but air pollution remains a significant issue; for example over 97% of sensitive habitat area in England is predicted to exceed the critical loads for ecosystem protection from atmospheric nitrogen deposition (England Biodiversity Strategy, Defra 2011). A priority action in the England Biodiversity Strategy is to reduce air pollution impacts on biodiversity. The planning system plays a key role in determining the location of developments which may give rise to pollution, either directly or from traffic generation, and hence planning decisions can have a significant impact on the quality of air, water and land. The assessment should take account of the risks of air pollution and how these can be managed or reduced. Further information on air pollution impacts and the sensitivity of different habitats/designated sites can be

found on the Air Pollution Information System [redacted]). Further information on air pollution modelling and assessment can be found on the Environment Agency website.

7. Climate Change Adaptation

The England Biodiversity Strategy published by Defra establishes principles for the consideration of biodiversity and the effects of climate change. The ES should reflect these principles and identify how the development's effects on the natural environment will be influenced by climate change, and how ecological networks will be maintained. The NPPF requires that the planning system should contribute to the enhancement of the natural environment 'by establishing coherent ecological networks that are more resilient to current and future pressures' (NPPF Para 174), which should be demonstrated through the ES.

8. Cumulative and in-combination effects

A full consideration of the implications of the whole scheme should be included in the ES. All supporting infrastructure should be included within the assessment.

The ES should include an impact assessment to identify, describe and evaluate the effects that are likely to result from the project in combination with other projects and activities that are being, have been or will be carried out. The following types of projects should be included in such an assessment, (subject to available information):

a. existing completed projects;
b. approved but uncompleted projects;
c. ongoing activities;
d. plans or projects for which an application has been made and which are under consideration by the consenting authorities; and
e. plans and projects which are reasonably foreseeable, i.e. projects for which an application has not yet been submitted, but which are likely to progress before completion of the development and for which sufficient information is available to assess the likelihood of cumulative and in-combination effects.

Norfolk County Council

Community and Environmental
Services Department
Planning Services Floor 6
County Hall
Martineau Lane
Norwich
NR1 2SG

NCC general enquiries: 0344 800 8020
Text relay no: 18001 0344 800 8020

Ms Karen Wilkinson
The Planning Inspectorate
Major Casework Directorate
Temple Quay House
2 The Square
Bristol
BS1 6PN

Your Ref: EN010110-000004
Date: 23 December 2019

My Ref: CP/2019/0008

[redacted]

Dear Ms Wilkinson

Medworth Energy from Waste Combined Heat and Power Facility

Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) – Regulations 10 and 11: Consultation on Scoping Report

I refer to your letter of 5 December 2019 relating to the proposed development of the Medworth Energy from Waste (EfW) Combined Heat and Power Facility.

Having reviewed the Scoping Report for this project and consulted with my colleagues here at Norfolk County Council, I can have set out below the information we believe should be provided in the scope of the Environmental Statement. Although only the proposed grid connection corridors fall within Norfolk, given both the proximity of the proposed EfW facility to the County, and therefore its likelihood to have significant impacts beyond the Cambridgeshire boundary, we have looked at the project as a whole and not solely those elements that sit within Norfolk's geographical boundary.

Biodiversity

Chapter 10 of the Scoping Report sets out the scope of the assessment for biodiversity. All surveys should be undertaken by an appropriately qualified and experienced Ecologist, that meets the relevant British Standard (BS42020:2013 Biodiversity – Code of practice for planning and development) and complies with industry best practice (e.g. CIEEM technical standards).

We would like to point out that Footnote 110: CIEEM's guidelines for Ecological Impact Assessment (EcIA) was updated in 2019 and the most recent version of the guidelines should be used. We would also like to draw to the attention of the applicant that the Borough Council has a Monitoring and Mitigation Strategy in place for Natura 2000 sites.

Landscape

We note both that within the Landscape and Visual Impact Assessment (LVIA) a large proportion of the proposed study area is in Norfolk, and that the developer's Zone of Theoretical Visibility (Figures 8.2-8.4) underlines that the applicant is considering the potential views from within Norfolk as well as Cambridgeshire. Furthermore, the applicant has highlighted Landscape Character Areas in Norfolk as well as Cambridgeshire.

We recommend that any view points proposed for the Landscape and Visual Impact Assessment LVIA suitably covers Norfolk and we would welcome being involved in any relevant stakeholder discussions regarding viewpoints and or landscape mitigation proposed. For further information / discussion, please contact the County Council's Green Infrastructure and Landscape Officer, Emily Smith [redacted]

Flood and Water Management

We recommend that any EIA includes, or any planning application for development is accompanied by a Flood Risk Assessment (FRA) / surface water drainage strategy to address:

- all sources of flood risk, including those from ordinary watercourses, surface water and groundwater to the development;
- how surface water drainage from the development would be managed on-site and show compliance with the written Ministerial Statement HCWS 161 by ensuring that Sustainable Drainage Systems (SuDS) are put in place;
- how any phasing (if proposed) of the development would affect the overall drainage strategy and what arrangements, temporary or otherwise, would need to be in place at each stage of the development in order to ensure the satisfactory performance of the overall surface water drainage system for the entirety of the development.

This supporting information would assess the potential for the development to increase the risk of flooding from the proposal or how surface water runoff through the addition of hard surfaces would be managed. It will show how this would be managed to ensure that the development does not increase flood risk on the site or elsewhere, in line with National Planning Policy Framework (paragraph 103).
In this particular case this would include appropriate information on;

- Appropriate assessment and mitigation of sources of sources of surface water flood risk shown on the EA Risk of Surface Water Flooding mapping.
- Sustainable Drainage Systems (SuDS) proposals in accordance with appropriate guidance including "Non-statutory technical standards for sustainable drainage systems" March 2015 by Department for Environment, Food and Rural Affairs.
- At least one feasible proposal for the disposal of surface water drainage should be demonstrated and in many cases, supported by the inclusion of appropriate information. It is important that the SuDS principles and hierarchies have been followed in terms of: o surface water disposal location, prioritised in the following order: disposal of water to shallow infiltration, to a watercourse, to a surface water sewer, combined sewer / deep infiltration (generally greater than 2m below ground level),
    - the SuDS components used within the management train (source, site and regional control) in relation to water quality and quantity;
    - identifying multifunctional benefits including amenity and biodiversity.

- The drainage strategy should also contain a maintenance and management plan detailing the activities required and details of who would adopt and maintain all the surface water drainage features for the lifetime of the development.

Please note, if there are any works proposed as part of this application that are likely to affect flows in an ordinary watercourse, then the applicant is likely to need the approval of the relevant IDBs. It is important to note that works carried out on the floodplain of a main river, less than 8 metres from the river bank, culvert or flood defence structure and/or 16 metres if it is a tidal main river must be consented by the EA.

Further guidance for developers can be found on our website at:
https://www.norfolk.gov.uk/rubbish-recycling-and-planning/flood-and-water-management/information-for-developers

Cultural Heritage (Archaeology)
We are content that with the desk-based assessment that is proposed to be carried out for the parts of the development that are proposed in Norfolk, as detailed in the Scoping Report.

Human Health
The applicant is recommended to complete a full Health Impact Assessment (HIA) as part of the ES. Any potential impact on physical or mental health should be assessed for its impact on health inequalities including during both the facility's construction and operational phases.

It is suggested the population estimate for the King's Lynn Borough is reviewed because this is considered to be too low.

Traffic/Transport
The applicant will need to assess the following potential impacts as part of the ES.

Roads that would be crossed and impacted upon by the Grid Connection Corridor need to be assessed. The scope of the assessment relative to the connection needs to be agreed with the appropriate Highway Authority. In highway and transport terms, the following factors need to be considered:

- Identify the underground cable route (width and length to be determined) including the requirement for any trenchless crossings to the highway. The crossing method must be agreed in advance with the highway authority
- Access points to any potential section of overhead line (OHL)
- Infrastructure to connect into the substation or OHL
- Location for temporary accesses and Temporary Construction Compounds,
- Storage and laydown areas;
- Potential permanent accesses

Assessment for the above needs to take into account the following:

1. Vehicles – Define the nature of the traffic likely to be generated. In addition for the largest vehicles proposed to use each access route(s) this must include:

- minimum width (including unhindered horizontal space)

- vertical clearance;
- axle weight restriction.

2. Access & Access Route – description of the route (including plans at an appropriate scale incorporating swept-path surveys). Assessment to include site inspection and details of contact with the appropriate Highway Authority (including Highways England for Trunk Roads where applicable). In addition:

- details of any staff/traffic movements/access routes;
- detailed plans of site access/es incorporating sightline provision
- confirmation of any weight restrictions applicable on the route together with details of contact with the relevant Bridge Engineer
- overhead/ underground equipment – details of liaison with statutory undertakers – listing statutory undertakers consulted together with a copy of their responses
- details of any road signs or other street furniture along each route that may need to be temporarily removed/relocated

3. Impacts during construction – Are any special requirements needed and if so provide details e.g:

- timing of construction works;
- removal of parked vehicles along the route(s) – full details will need to be provided – including whether or not alternative parking arrangements are being offered or bus services provided in lieu of potential loss of ability to use private cars;
- removal and reinstatement of hedgerows – since these are usually in private ownership has contact been made with the owners. Has formal legal agreement been reached or are negotiations pending/ in progress;
- identification of the highway boundary along the construction traffic route together with verification from the Highway Authority (scope to be agreed in advance);
- any modifications required to the alignment of the carriageway or verges/over-runs
- identification of sensitive features/receptors along the route;
- confirmation of whether any of the verges along the route(s) are classified as SSSI or roadside Nature Reserve status. If so, detail any impact;
- confirmation of any extraordinary maintenance agreement/s required by the Highway Authority.

4. Cabling route/grid connection – Description of the route/s including plans at an appropriate scale, incorporating, for example:

- assessment to include site inspection and details of contact with the appropriate Highway Authority (including Highways England for Trunk Roads where applicable);
- traffic details of grid connection enabling works.

5. Impacts during operation

- details of type and frequency of vehicle to be used to service the facility/structure(s) when in operation;
- details of any long-term highway impact e.g. will trees and hedgerows need additional trimming to allow access for service vehicles;
- assessment of any impact on adjacent/affected public rights of way e.g. horses and pedestrians.

6. Impacts during decommissioning – Define the expected life span of the facility/structure(s).

- provide details of decommissioning works including an assessment of whether or not the structure is to be scrapped - i.e. can it be broken up on site and removed or would it require the same logistical process as initial construction.

Socio-Economic

1. Employment and Training

While Norfolk County Council welcomes the employment opportunities the development would have within the local/regional economy both during construction and once operational, it is felt that given the proposal's proximity to Norfolk and the likelihood of additional major construction projects in Norfolk arising from the offshore wind energy sector (i.e. associated with the Hornsea Three Project; Norfolk Vanguard and Boreas; and East Anglia Offshore Wind One (North) and Two); and the Sizewell C Nuclear Power Plan proposal, there is a need for:

(a) Wider consideration of supply chain issues to address working with neighbouring authorities such as Norfolk; and,

(b) Ensuring that any Education, Skills and Employment Strategy addresses/considers the wider cumulative impacts arising from other planned NSIPs in the area (i.e. covering the above onshore and offshore projects).

The County Council would therefore suggest that the applicant develops an outline skills and employment strategy to accompany any application. This will need to address the above potential cross boundary issues. Such strategies have been taken forward in other NSIPs covering for example the offshore wind energy sector developments.

For further information please contact Norfolk County Council's Economic Development Manager, David Dukes [redacted] and the Employment and Skills Manager, Jan Feeney [redacted]

2. Transmission Networks

The EIA will need to consider the following issues:

a) Whether the existing overhead lines and substation/s are sufficient to be able to cope with the energy proposal;
b) Whether there would be a need to upgrade any existing overhead power lines;
c) Whether there is a need for a new electricity substation.

The EIA should also address the cumulative impact on the Grid Network arising from any existing or proposed energy schemes in the area.

With regards to the new power lines needed (or existing power lines up-graded) or any other infrastructure needs up-grading (e.g. sub-station) there would need to be a description of the route(s) including plans at an appropriate scale. The ES should incorporate:

- an assessment of their impact (these elements of the scheme should be included and fully assessed within the scope of the relevant Landscape / Biodiversity / Archaeology / Traffic etc sections of the ES, as set out elsewhere in this letter);
- details of temporary construction compounds;
- identification of any sensitive features along route.

The EIA/PEIR should consider the possibility of putting overhead power lines underground in order to minimise their impact. For further information please contact Stephen Faulkner, Principal Planner [redacted]

I trust the above information is of use. Should you require any further information or wish to discuss this further please do not hesitate to contact me.

Yours sincerely

[redacted]

Nick Johnson
Head of Planning

From: Ben Rowe
To: Medworth
Subject: RE: EN010110 Medworth Energy from Waste Combined Heat and Power Facility EIA Scoping Consultation
Date: 06 December 2019 10:25:25

Karen,
I have referred your request to Geoff Lyon, my Manager (Major Projects).
He has confirmed that as it relates to around the Wisbech area, we do not have any comments to make.

I wasn't sure if you intended to be sent to us, as Kings Lynn & West Norfolk Borough Council would be nearer.

Regards,
Ben

Ben Rowe
Assistant Technical Officer
[redacted]

From: Medworth <Medworth@planninginspectorate.gov.uk>
Sent: 05 December 2019 15:53
Subject: EN010110 Medworth Energy from Waste Combined Heat and Power Facility EIA Scoping Consultation

Dear Head of Planning

Please see attached correspondence on the proposed Medworth Energy from Waste Combined Heat and Power Facility.

Please note the deadline for consultation responses is Friday 3 January 2020 and is a statutory requirement that cannot be extended.

Regards

Karen

Karen Wilkinson
EIA and Land Rights Advisor
Major Casework Directorate
The Planning Inspectorate, Temple Quay House, Temple Quay, Bristol BS1 6PN

Twitter: @PINSgov
Helpline: 0303 444 5000
Email: Medworth@planninginspectorate.gov.uk

Web: https://infrastructure.planninginspectorate.gov.uk/ (National Infrastructure Planning)

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Please view our Privacy Notice before sending information to the Planning Inspectorate.

Public Health England

Environmental Hazards and Emergencies Department
Centre for Radiation, Chemical and Environmental Hazards (CRCE)
Seaton House
City Link
London Road
Nottingham NG2 4LA

nsipconsultations@phe.gov.uk

www.gov.uk/phe

Your Ref: EN010110-000004
Our Ref: 52645

Ms Karen Wilkinson
EIA and Land Rights Advisor
The Planning Inspectorate
3D Eagle Wing
Temple Quay House
2 The Square
Bristol BS1 6PN

27 December 2019

Dear Ms Wilkinson

Nationally Significant Infrastructure Project
Application for an Order Granting Development Consent for the proposed Medworth Energy from Waste, Combined Heat and Power Facility, Wisbech, Cambridgeshire. PE13 2TQ
Scoping Consultation Stage

Thank you for including Public Health England (PHE) in the scoping consultation phase of the above application. Advice offered by PHE is impartial and independent.

PHE exists to protect and improve the nation's health and wellbeing and reduce health inequalities; these two organisational aims are reflected in the way we review and respond to Nationally Significant Infrastructure Project (NSIP) applications.

The health of an individual or a population is the result of a complex interaction of a wide range of different determinants of health, from an individual's genetic make-up, to lifestyles and behaviours, and the communities, local economy, built and natural environments to global ecosystem trends. All developments will have some effect on the determinants of health, which in turn will influence the health and wellbeing of the general population, vulnerable groups and individual people. Although assessing impacts on health beyond direct effects from for example emissions to air or road traffic incidents is complex, there is a need to ensure a proportionate assessment focused on an application's significant effects.

Having considered the submitted scoping report we wish to make the following specific comments and recommendations:

Environmental Public Health
We understand that the promoter will wish to avoid unnecessary duplication and that many issues including air quality, emissions to water, waste, contaminated land etc. will be covered elsewhere in the Environmental Statement (ES). We believe the summation of relevant issues into a specific section of the report provides a focus which ensures that public health is given adequate consideration. The section should summarise key information, risk assessments, proposed

mitigation measures, conclusions and residual impacts, relating to human health. Compliance with the requirements of National Policy Statements and relevant guidance and standards should also be highlighted.

In terms of the level of detail to be included in an ES, we recognise that the differing nature of projects is such that their impacts will vary. The attached appendix summarises PHE's requirements and recommendations regarding the content of and methodology used in preparing the ES. Please note that where impacts relating to health and/or further assessments are scoped out, promoters should fully explain and justify this within the submitted documentation.

Air Quality and Public Health

Construction activity (including traffic movements) associated with activities of the development may generate localised emissions leading to exposure of local residents and the public. We welcome the proposed inclusion of the Construction Management Plan (CMP) with commitments to mitigate exposure to air pollution (e.g. fine particulate matter, dusts and nitrogen dioxide) to as low as possible below the air quality standards. Any issues raised by local communities need efficient management during the development and construction phase, as well as the decommissioning phase if the infrastructure is to be removed or upgraded.

With regard to emissions from Energy from Waste developments. PHE has reviewed research undertaken to examine the suggested links between emissions from municipal waste incinerators and effects on health (https://www.gov.uk/government/publications/municipal-waste-incinerators-emissions-impact-on-health). PHE's risk assessment remains that modern, well run and regulated municipal waste incinerators are not a significant risk to public health. While it is not possible to rule out adverse health effects from these incinerators completely, any potential effect for people living close by is likely to be very small. We welcome the operational emissions being scoped into the assessment.

Recommendation

Our position is that pollutants associated with road traffic or combustion, particularly particulate matter and oxides of nitrogen, are non-threshold; i.e., an exposed population is likely to be subject to potential harm at any level and that reducing public exposures of non-threshold pollutants (such as particulate matter and nitrogen dioxide) below air quality standards will have potential public health benefits. We support approaches which minimise or mitigate public exposure to non-threshold air pollutants, address inequalities (in exposure), and maximise co-benefits (such as physical exercise). We encourage their consideration during development design, environmental and health impact assessment, and development consent.

Electromagnetic fields

It is noted that the current proposals do not appear to consider possible health impacts of Electric and Magnetic Fields (EMF).

Recommendation

We request the developer should confirm either that the proposed development does not impact any receptors from potential sources of EMF; or ensure that an adequate assessment of the possible impacts is undertaken and included in the ES. Please refer to the appendix below for further information.

Human Health and Wellbeing

This section of PHE's scoping response, identifies the wider determinants of health and wellbeing we expect the ES to address, to demonstrate whether they are likely to give rise to significant

effects. We have focused our approach on scoping determinants of health and wellbeing under four themes, which have been derived from an analysis of the wider determinants of health mentioned in the National Policy Statements. The four themes are:

- Access
- Traffic and Transport
- Socioeconomic
- Land Use

Having considered the submitted scoping report we wish to make the following specific comments and recommendations:

Methodology

Definition of health and study area

The scoping report does not define health but does make reference to many wider determinants. It is useful to be clear and provide a definition of health, including mental health.

The scoping report does not mention mental health, but it is important that mental health has parity of esteem with physical health and wellbeing. Mental well-being is fundamental to achieving a healthy, resilient and thriving population. It underpins healthy lifestyles, physical health, educational attainment, employment and productivity, relationships, community safety and cohesion and quality of life. A scheme of this scale and nature has impacts on the over-arching protective factors, which are:

• Enhancing control
• Increasing resilience and community assets
• Facilitating participation and promoting inclusion.

The scoping report does not identify the proposed study area for population and human health and inadequate detail is presented regarding the scope of assessment for the connection corridor, which may form part of the DCO submission.

Recommendation

We would recommend the use of the broad definition of health proposed by the World Health Organisation (WHO) and we welcome a specific reference to mental health.

There should be parity between mental and physical health, and any assessment of health impact should include the appreciation of both. A systematic approach to the assessment of the effects on mental health, including suicide, is required.

The PEIR should reference the methodology used to complete assessments for the effects on mental health and wellbeing. The Mental Well-being Impact Assessment (MWIA) could be used as a methodology. The PEIR should clearly identify this study area and include justification for the decision. The study area must include the connection corridor for any under or over ground cables or pipework.

Vulnerable populations

An approach to the identification of sensitive receptors has been provided but does not make links to the list of protected characteristics within an Equality Impact Assessment (EqIA). The impacts on health and wellbeing and health inequalities of the scheme may have particular effect on vulnerable or disadvantaged populations, including those that fall within the list of protected characteristics. The ES and any EqIA should not be completely separated.

Recommendation

The assessments and findings of the ES and any EqIA should be crossed referenced between the two documents, particularly to ensure the comprehensive assessment of potential impacts for health and inequalities and where resulting mitigation measures are mutually supportive.

The list of sensitive receptors should be expanded to include the position of local community assets or facilities that are within the study area, which must include the main site and connection corridors (if they form part of the eventual DCO scheme).

Physical activity and active travel / access to open space

The scoping report identifies how non-motorised user (NMU) will be potentially affected through the loss or change in the existing road network. Active travel forms an important part in helping to promote healthy weight environments and as such it is important that any changes have a positive long term impact where possible. Changes to NMU routes have the potential to impact on usage, create displacement to other routes and potentially lead to increased road traffic collisions.

A scheme of this scale and nature can also provide opportunities to enhance the existing infrastructure that supports active travel and we expect the proposal to contribute to improved provision for active travel and physical activity.

The scoping report identifies potential highway schemes to the local area (Wisbech Access Study for road widening and junction improvement, known at the 'Southern Access Road), but does not confirm what baselines will be used for the traffic assessment. It is also noted that New Bridge Road may be widened to form a new access road.

Recommendations

The overall risk to NMU and impact on active travel should be considered on a case-by-case basis, taking into account, the number and type of users and the effect that the temporary traffic management system will have on their journey and safety. The traffic assessment must include any NMU of the local network and New Bridge Road. Any traffic counts and assessment should also, as far as reasonably practicable, identify informal routes used by NMU or potential routes used due to displacement. The final ES should identify the temporary traffic management system design principles or standards that will be maintained with specific reference to NMU. This may be incorporated within the Code of Construction Practice. The scheme should continue to identify any additional opportunities to contribute to improved infrastructure provision for active travel and physical activity.

Receptors and effects scoped out of the assessment

Paragraph 14.5.7 identifies the following receptors will be scoped out from being subject to further assessment.

- Direct effects on tourism and recreation during construction and operation;
- Demand for local services;
- Impacts on nearby recreational facilities and businesses; and
- In addition, effects on the amenity of local residents and the local community due to traffic (Chapter 5), noise (Chapter 6), air quality (Chapter 7), visual impact (Chapter 8), and traffic, are not included in this chapter as these would be considered in the relevant EIA Report chapter as noted.

However, this is contradicted in paragraph 14.6.10 which identifies that during the construction of the Proposed Development there will be a sizeable influx of construction workers into Wisbech (up to 700 construction personnel are anticipated over the estimated 3-year construction period for the

Proposed Development). It further states that this could put pressure on health services and facilities in the local area. It also states in paragraph 14.6.12 that indirect effects upon tourism and recreation will be scoped in.

The report also proposes to scope out any impacts on local housing, but with insufficient justification. Given that the scoping reports identifies the potential impact from the construction workforce on local services, the assessment should also consider impacts on the local housing market. Non-home based construction workers are more likely to utilise temporary accommodation, both within the tourist sector and within the private rented sector. The presence of significant numbers of workers could foreseeably have an impact on the local availability of affordable housing, particularly that of short term tenancies, for certain communities.

Recommendation
The PEIR should identify the number of non-home based construction workers (both for the plant and connection corridor) and whether these are likely to be from within the existing population non-home based. Demand for temporary accommodation by the construction work force should be identified and an assessment made regarding the impact on local housing supply and affordability, particularly in relation to homelessness provision of short term housing supply. Given the number of other large developments the cumulative impact on housing provision should be assessed.
The impact of the development on the tenants of social or private rented sector housing should be considered within the PEIR where appropriate, which should identify the scale and nature of impact and address and specific mitigation measures. The assessment should also include impacts on local services, tourism and recreation as outlined in paragraphs 14.06.10 and 14.06.12.

Cumulative effects
The East of England is experiencing a large number of development schemes, with the potential for concurrent increases in non-home based workers seeking housing within the area and an increased presence of HGVs on the highway network. Individual schemes, albeit of limited scale can add to this situation.

Recommendation
The cumulative effects assessments should include the demand for housing and the presence of additional HGV movements on the highway network.

Monitoring
We expect an assessment to include consideration of the need for monitoring. It may be appropriate to undertake monitoring where:

- Critical assumptions have been made
- There is uncertainty about whether negative impacts are likely to occur, as it may be appropriate to include planned monitoring measures to track whether impacts do occur.
- There is uncertainty about the potential success of mitigation measures
- It is necessary to track the nature of the impact and provide useful and timely feedback that would allow corrective mitigation to be taken.

Recommendation
The need for monitoring should be assessed and reported within the PEIR.

We refer you to the Appendix below for further guidance.

Yours sincerely

For and on behalf of Public Health England
nsipconsultations@phe.gov.uk

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

Appendix: PHE recommendations regarding the scoping document

Introduction

The Planning Inspectorate's Advice Note 11: Working with Public Bodies covers many of the generic points of interaction relevant to the Planning Inspectorate and Public Health England (PHE). The purpose of this Annex is to help applicants understand the issues that PHE expect to see addressed by applicants preparing an Environmental Statement (ES) as part of their Nationally Significant Infrastructure Planning (NSIP) submission.

We have included a comprehensive outline of the type of issues we would expect to be considered as part of an NSIP which falls under the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations). PHE encourages applicants to contact us as early in the process as possible if they wish to discuss or clarify any matters relating to chemical, poison, radiation or wider public health.

General Information on Public Health England

PHE was established on 1 April 2013 to bring together public health specialists from more than 70 organisations into a single public health service. We are an executive agency of the Department of Health and are a distinct delivery organisation with operational autonomy to advise and support government, local authorities and the National Health Service (NHS) in a professionally independent manner.

We operate from 8 local centres, plus an integrated region and centre for London, and 4 regions (North of England, South of England, Midlands and East of England, and London). We work closely with public health professionals in Wales, Scotland and Northern Ireland, and internationally.[1] We have specialist teams advising on specific issues such as the potential impacts of chemicals, air quality, ionising and non-ionising radiation and other factors which may have an impact on public health, as well as on broader issues such as the wider determinants of health, health improvement and health inequalities.

PHE's NSIP Related Roles and Responsibilities and Geographical Extent

PHE is a statutory consultee in the NSIP process for any *applications likely to involve chemicals, poisons or radiation which could potentially cause harm to people and are likely to affect significantly public health*.[2] PHE will consider the potential significant effects (direct and indirect) of a proposed development on population and human health and the impacts from chemicals, radiation and environmental hazards.

Under certain circumstances PHE may provide comments on ionising radiation to/on behalf of the Scottish Parliament. If a proposer is submitting a planning application in Scotland which may require advice on radiation you are recommended to contact the appropriate Scottish Planning Authority for advice on how to proceed.

In the case of applications in Wales, PHE remains a statutory consultee but the regime applies to a more limited range of development types. For NSIP applications likely to affect land in Wales, an applicant should still consult PHE but, additionally will be required to consult the Welsh Ministers.

Role of Public Health England and NSIP with respect to Environmental Impact Assessments

PHE has a statutory role as a consultation body under the EIA Regulations. Where an applicant has requested a scoping opinion from the Planning Inspectorate[3] in relation to a proposed NSIP, PHE will be consulted by the Planning Inspectorate about the scope, and level of detail, of the

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[1] https://www.gov.uk/government/organisations/public-health-england/about#priorities

[2] The Infrastructure Planning (Interested Parties and Miscellaneous Prescribed Provisions) Regulations 2015

[3] The scoping process is administered and undertaken by the Planning Inspectorate on behalf of the Secretary of State

information to be provided in the ES and will be under a duty to make information available to the applicant. PHE's standard recommendations in response to EIA scoping consultations are below.

PHE also encourages applicants to discuss with them the scope of the ES at an early stage to explore, for example, whether careful site selection or other design issues could minimise or eliminate public health impacts or to outline the requirement for, scope and methodology of any assessments related to public health.

PHE's Recommendations to Applicants Regarding Environmental Impact Assessments

General Approach

Applicants are reminded that Section 5(2)(a) of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 specifically includes a requirement that the EIA must identify, describe and assess in an appropriate manner, in light of each individual case, the direct and indirect significant effects of the proposed development on population and human health.

PHE is of the opinion that this requirement encompasses the wider determinants of public health, as well as chemicals, poisons and radiation. Further information on PHE's recommendations and requirements is included below.

It is the role of the applicant to prepare the ES. PHE provides advice relating to EIA within this document and during the NSIP consultation stages.

When preparing an ES the applicant should give consideration to best practice guidance such as the Government's Handbook for scoping projects: environmental impact assessment[4] , IEMA Guide to Delivering Quality Developments[5], and Guidance: on Environmental Impact Assessment[6]

The Planning Inspectorate's Advice Note Seven: Environmental Impact Assessment: Process, Preliminary Environmental Information and Environmental Statements also provide guidance to applicants and other persons with interest in the EIA process as it relates to NSIPs.

It is important that the submitted ES identifies and assesses the potential public health impacts of the activities at, and emissions from, the development.

PHE understands that there may be separate sections of the ES covering the assessment of impacts on air, land, water and so on, but expects an ES to include a specific section summarising potential impacts on population and health. This section should bring together and interpret the information from other assessments as necessary. The health and population impacts section should address the following steps.

1. Screening: Identify and significant effects.
    a. Summarise the methodologies used to identify health impacts, assess significance and sources of information
    b. Evaluate any reference standards used in carrying out the assessment and in evaluating health impacts (e.g., environmental quality standards)
    c. Where the applicant proposes the 'scoping out' of any effects a clear rationale and justification should be provided along with any supporting evidence.

2. Baseline Survey :

[4] https://www.gov.uk/government/publications/handbook-for-scoping-projects-environmental-impact-assessment
[5] [redacted]
[6] https://www.gov.uk/guidance/environmental-impact-assessment#the-purpose-of-environmental-impact-assessment

a. Identify information needed and available, Evaluate quality and applicability of available information
b. Undertake assessment

3. Alternatives:
    a. Identify and evaluate any realistic alternative locations, routes, technology etc.

4. Design and assess possible mitigation
    a. Consider and propose suitable corrective actions should mitigation measures not perform as effectively predicted.

5. Impact Prediction: Quantify and Assess Impacts:
    a. Evaluate and assess the extent of any positive and negative effects of the development. Effects should be assessed in terms of likely health outcomes, including those relating to the wider determinants of health such as socio-economic outcomes, in addition to health outcomes resulting from exposure to environmental hazards. Mental health effects should be included and given equivalent weighting to physical effects.
    b. Clearly identify any omissions, uncertainties and dependencies (e.g., air quality assessments being dependant on the accuracy of traffic predictions).
    c. Evaluate short-term impacts associated with the construction and development phase.
    d. Evaluate long-term impacts associated with the operation of the development.
    e. Evaluate any impacts associated with decommissioning.
    f. Evaluate any potential cumulative impacts as a result of the development, currently approved developments which have yet to be constructed, and proposed developments which do not currently have development consent.

6. Monitoring and Audit (not a statutory requirement)
    a. Identify key modelling predictions and mitigation impacts and consider implementing monitoring and audit to assess their accuracy / effectiveness.

Any assessments undertaken to inform the ES should be proportionate to the potential impacts of the proposal, therefore we accept that, in some circumstances particular assessments may not be relevant to an application, or that an assessment may be adequately completed using a qualitative rather than quantitative methodology. In cases where this decision is made, the applicant should fully explain and justify their rationale in the submitted documentation.

Consideration of alternatives (including alternative sites, choice of process, and the phasing of construction) is widely regarded as good practice. Ideally, the EIA process should start at the stage of site selection, so that the environmental merits of practicable alternatives can be properly considered. Where this is undertaken, the main alternatives considered should be outlined in the ES[7].

Human and Environmental Receptors

The applicant should clearly identify the development's location and the location and distance from the development of off-site human receptors that may be affected by emissions from, or activities at, the development. Off-site human receptors may include people living in residential premises; people working in commercial, and industrial premises and people using transport infrastructure (such as roads and railways), recreational areas, and publicly-accessible land.

Identify and consider impacts on residential areas and sensitive receptors (such as schools, nursing homes and healthcare facilities, as well as other vulnerable population groups such as those who are young, older, with disabilities or long-term conditions, or on low incomes) in the area(s) which

[7] DCLG guidance, 1999 http://www.communities.gov.uk/documents/planningandbuilding/pdf/155958.pdf

may be affected by emissions, this should include consideration of any new receptors arising from future development

Consideration should also be given to environmental receptors such as the surrounding land, watercourses, surface and groundwater, and drinking water supplies such as wells, boreholes and water abstraction points.

Impacts Arising from Construction and Decommissioning

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

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

Emissions to Air and Water

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

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

- include appropriate screening assessments and detailed dispersion modelling where this is screened as necessary
- encompass the combined impacts of all pollutants which may be emitted by the development with all pollutants arising from associated development and transport, considered in a single holistic assessment (ie, of overall impacts)
- include Chemical Abstract Service (CAS) numbers alongside chemical names, where referenced in the ES
- consider the construction, operational, and decommissioning phases
- consider the typical operational emissions and emissions from start-up, shut-down, abnormal operation and accidents when assessing potential impacts and include an assessment of worst-case impacts
- fully account for fugitive emissions
- include appropriate estimates of background levels
    - when assessing the human health risk of a chemical emitted from a facility or operation, background exposure to the chemical from other sources should be taken into account
- identify cumulative and incremental impacts (ie, assess cumulative impacts from multiple sources), including those arising from associated development, other existing and proposed development in the local area, and new vehicle movements associated with the proposed development; associated transport emissions should include consideration of non-road impacts (ie, rail, sea, and air)
- include consideration of local authority, Environment Agency, Natural Resources Wales, Defra national network, and any other local site-specific sources of monitoring data
- compare predicted environmental concentrations to the applicable standard or guideline value for the affected medium. Where available, the most recent UK standards for the appropriate

media (ie, air, water, and/or soil) and health-based guideline values should be used when quantifying the risk to human health from chemical pollutants

- where UK standards or guideline values are not available, use those recommended by the European Union or World Health Organization:
    - If no standard or guideline value exists, the predicted exposure to humans should be estimated and compared to an appropriate health-based value (eg, a Tolerable Daily Intake or equivalent)
    - This should consider all applicable routes of exposure (eg, include consideration of aspects such as the deposition of chemicals emitted to air and their uptake via ingestion)
- when quantitatively assessing the health risk of genotoxic and carcinogenic chemical pollutants, PHE does not favour the use of mathematical models to extrapolate from high dose levels used in animal carcinogenicity studies to well below the observed region of a dose-response relationship. When only animal data are available, we recommend that the 'Margin of Exposure' (MOE) approach[1] is used
- identify and consider impacts on residential areas and sensitive receptors (such as schools, nursing homes and healthcare facilities) in the area(s) which may be affected by emissions. This should include consideration of any new receptors arising from future development.

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

PHE's view is that the applicant should appraise and describe the measures that will be used to control both point source and fugitive emissions and demonstrate that standards, guideline values or health-based values will not be exceeded due to emissions from the installation, as described above. This should include consideration of any emitted pollutants for which there are no set emission limits. When assessing the potential impact of a proposed installation on environmental quality, predicted environmental concentrations should be compared to the permitted concentrations in the affected media; this should include both standards for short and long-term exposure. Further to assessments of compliance with limit values, for non-threshold pollutants (ie, those that have no threshold below which health effects do not occur) the **benefits** of development options which reduce population exposure should be evaluated.

Additional points specific to emissions to air

When considering baseline conditions (of existing air quality) and the assessment and future monitoring of impacts, these should include:

- consideration of impacts on existing areas of poor air quality e.g. existing or proposed local authority Air Quality Management Areas (AQMAs)
- modelling using appropriate meteorological data (i.e. come from the nearest suitable meteorological station and include a range of years and worst-case conditions)
- modelling taking into account local topography, congestion and acceleration
- evaluation of the public health **benefits** of development options which reduce air pollution – even below limit values – as pollutants such as nitrogen dioxide and particulate matter show no threshold below which health effects do not occur.

Additional points specific to emissions to water

When considering baseline conditions (of existing water quality) and the assessment and future monitoring of impacts, these should:

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

- include consideration of potential impacts on recreational users (eg, from fishing, canoeing etc.) alongside assessment of potential exposure via drinking water.

Land Quality

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

Emissions to and from the ground should be considered in terms of the previous history of the site and the potential of the site, once operational, to give rise to issues. Public health impacts associated with ground contamination and/or the migration of material off-site should be assessed[8] and the potential impact on nearby receptors and control and mitigation measures should be outlined.

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

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

Waste

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

For wastes arising from the development the ES should assess:

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

If the development includes wastes delivered to the installation:

- Consider issues associated with waste delivery and acceptance procedures (including delivery of prohibited wastes) and should assess potential off-site impacts and describe their mitigation.

Other Aspects

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

PHE would expect the applicant to consider the COMAH Regulations (Control of Major Accident Hazards) and the Major Accident Off-Site Emergency Plan (Management of Waste from Extractive Industries) (England and Wales) Regulations: both in terms of their applicability to the development itself, and the development's potential to impact on, or be impacted by, any nearby installations themselves subject to these Regulations.

There is evidence that, in some cases, perception of risk may have a greater impact on health than the hazard itself. A 2009 report[9], jointly published by Liverpool John Moores University and the

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

[9] Available from: [redacted]

Health Protection Agency (HPA), examined health risk perception and environmental problems using a number of case studies. As a point to consider, the report suggested: "*Estimation of community anxiety and stress should be included as part of every risk or impact assessment of proposed plans that involve a potential environmental hazard. This is true even when the physical health risks may be negligible*." PHE supports the inclusion of this information within ES' as good practice.

Electromagnetic Fields (EMF)

This advice relates to electrical installations such as substations and connecting underground cables or overhead lines. PHE advice on the health effects of power frequency electric and magnetic fields is available on the Gov.UK website.[10]

There is a potential health impact associated with the electric and magnetic fields around substations, overhead power lines and underground cables. The field strengths tend to reduce with distance from such equipment.

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

Policy Measures for the Electricity Industry

A voluntary code of practice is published which sets out key principles for complying with the ICNIRP guidelines.[11]

Companion codes of practice dealing with optimum phasing of high voltage power lines and aspects of the guidelines that relate to indirect effects are also available.[12],[13]

Exposure Guidelines

PHE recommends the adoption in the UK of the EMF exposure guidelines published by the International Commission on Non-ionizing Radiation Protection (ICNIRP). Formal advice to this effect, based on an accompanying comprehensive review of the scientific evidence, was published in 2004 by the National Radiological Protection Board (NRPB), one of PHE's predecessor organisations.[14]

Updates to the ICNIRP guidelines for static fields have been issued in 2009 and for low frequency fields in 2010. However, Government policy is that the ICNIRP guidelines are implemented as expressed in the 1999 EU Council Recommendation on limiting exposure of the general public (1999/519/EC):[15]

Static Magnetic Fields

For static magnetic fields, the ICNIRP guidelines published in 2009 recommend that acute exposure of the general public should not exceed 400 mT (millitesla), for any part of the body, although the previously recommended value of 40 mT is the value used in the Council Recommendation. However, because of potential indirect adverse effects, ICNIRP recognises that practical policies need to be implemented to prevent inadvertent harmful exposure of people with implanted electronic medical devices and implants containing

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[10] https://www.gov.uk/government/collections/electromagnetic-fields#low-frequency-electric-and-magnetic-fields
[11] https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/37447/1256-code-practice-emf-public-exp-guidelines.pdf
[12] https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/48309/1255-code-practice-optimum-phasing-power-lines.pdf
[13] https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/224766/powerlines_vcop_microshocks.pdf
[14] http://webarchive.nationalarchives.gov.uk/20140629102627/[redacted]
[15] http://webarchive.nationalarchives.gov.uk/+/www.dh.gov.uk/en/Publichealth/Healthprotection/DH_4089500

ferromagnetic materials, and injuries due to flying ferromagnetic objects, and these considerations can lead to much lower restrictions, such as 0.5 mT.

Power Frequency Electric and Magnetic Fields

At 50 Hz, the known direct effects include those of induced currents in the body on the central nervous system (CNS) and indirect effects include the risk of painful spark discharge on contact with metal objects exposed to electric fields. The ICNIRP guidelines published in 1998 give reference levels for public exposure to 50 Hz electric and magnetic fields, and these are respectively 5 kV m^{-1} (kilovolts per metre) and 100 μT (microtesla). The reference level for magnetic fields changes to 200 μT in the revised (ICNIRP 2010) guidelines because of new basic restrictions based on induced electric fields inside the body, rather than induced current density. If people are not exposed to field strengths above these levels, direct effects on the CNS should be avoided and indirect effects such as the risk of painful spark discharge will be small. The reference levels are not in themselves limits but provide guidance for assessing compliance with underlying basic restrictions and reducing the risk of indirect effects.

Long Term Effects

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

The Stakeholder Advisory Group on ELF EMFs (SAGE)

The Stakeholders Advisory Group on ELF EMF's (SAGE) was set up to explore the implications for a precautionary approach to extremely low frequency electric and magnetic fields (ELF EMFs), and to make practical recommendations to Government:[16]

Relevant here is SAGE's 2007 First Interim Assessment, which makes several recommendations concerning high voltage power lines. Government supported the implementation of low cost options such as optimal phasing to reduce exposure; however it did not support the option of creating corridors around power lines in which development would be restricted on health grounds, which was considered to be a disproportionate measure given the evidence base on the potential long term health risks arising from exposure. The Government response to SAGE's First Interim Assessment is available on the national archive website.[17]

The Government also supported calls for providing more information on power frequency electric and magnetic fields, which is available on the PHE web pages.

Ionising Radiation

Particular considerations apply when an application involves the possibility of exposure to ionising radiation. In such cases it is important that the basic principles of radiation protection recommended by the International Commission on Radiological Protection[18] (ICRP) are followed. PHE provides advice on the application of these recommendations in the UK. The ICRP recommendations are

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[16] [redacted]

[17] http://webarchive.nationalarchives.gov.uk/20130107105354/http://www.dh.gov.uk/en/Publicationsandstatistics/Publications/PublicationsPolicyAndGuidance/DH_107124

[18] These recommendations are given in publications of the ICRP notably publications 90 and 103 see the website at [redacted]

implemented in the Euratom Basic Safety Standards[19] (BSS) and these form the basis for UK legislation, including the Ionising Radiation Regulations 1999, the Radioactive Substances Act 1993, and the Environmental Permitting Regulations 2016.

As part of the EIA process PHE expects applicants to carry out the necessary radiological impact assessments to demonstrate compliance with UK legislation and the principles of radiation protection. This should be set out clearly in a separate section or report and should not require any further analysis by PHE. In particular, the important principles of justification, optimisation and radiation dose limitation should be addressed. In addition compliance with the Euratom BSS and UK legislation should be clear.

When considering the radiological impact of routine discharges of radionuclides to the environment PHE would, as part of the EIA process, expect to see a full radiation dose assessment considering both individual and collective (population) doses for the public and, where necessary, workers. For individual doses, consideration should be given to those members of the public who are likely to receive the highest exposures (referred to as the representative person, which is equivalent to the previous term, critical group).

Different age groups should be considered as appropriate and should normally include adults, 1 year old and 10 year old children. In particular situations doses to the fetus should also be calculated[20].

The estimated doses to the representative person should be compared to the appropriate radiation dose criteria (dose constraints and dose limits), taking account of other releases of radionuclides from nearby locations as appropriate. Collective doses should also be considered for the UK, European and world populations where appropriate.

The methods for assessing individual and collective radiation doses should follow the guidance given in 'Principles for the Assessment of Prospective Public Doses arising from Authorised Discharges of Radioactive Waste to the Environment August 2012 [21]

It is important that the methods used in any radiological dose assessment are clear and that key parameter values and assumptions are given (for example, the location of the representative persons, habit data and models used in the assessment).

Any radiological impact assessment, undertaken as part of the EIA, should also consider the possibility of short-term planned releases and the potential for accidental releases of radionuclides to the environment. This can be done by referring to compliance with the Ionising Radiation Regulations and other relevant legislation and guidance.

The radiological impact of any solid waste storage and disposal should also be addressed in the assessment to ensure that this complies with UK practice and legislation; information should be provided on the category of waste involved (e.g. very low level waste, VLLW). It is also important that the radiological impact associated with the decommissioning of the site is addressed.

Of relevance here is PHE advice on radiological criteria and assessments for land-based solid waste disposal facilities[22]. PHE advises that assessments of radiological impact during the

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[19] Council Directive 96/29/EURATOM laying down basic safety standards for the protection of the health of workers and the general public against the dangers arising from ionising radiation.

[20] HPA (2008) Guidance on the application of dose coefficients for the embryo, fetus and breastfed infant in dose assessments for members of the public. Doc HPA, RCE-5, 1-78, available at https://www.gov.uk/government/publications/embryo-fetus-and-breastfed-infant-application-of-dose-coefficients

[21] The Environment Agency (EA), Scottish Environment Protection Agency (SEPA), Northern Ireland Environment Agency, Health Protection Agency and the Food Standards Agency (FSA).
Principles for the Assessment of Prospective Public Doses arising from Authorised Discharges of Radioactive Waste to the Environment August 2012.
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/296390/geho1202bklh-e-e.pdf

operational phase should be performed in the same way as for any site authorised to discharge radioactive waste. PHE also advises that assessments of radiological impact during the post operational phase of the facility should consider long timescales (possibly in excess of 10,000 years) that are appropriate to the long-lived nature of the radionuclides in the waste, some of which may have half-lives of millions of years.

The radiological assessment should consider exposure of members of hypothetical representative groups for a number of scenarios including the expected migration of radionuclides from the facility, and inadvertent intrusion into the facility once institutional control has ceased.

For scenarios where the probability of occurrence can be estimated, both doses and health risks should be presented, where the health risk is the product of the probability that the scenario occurs, the dose if the scenario occurs and the health risk corresponding to unit dose.

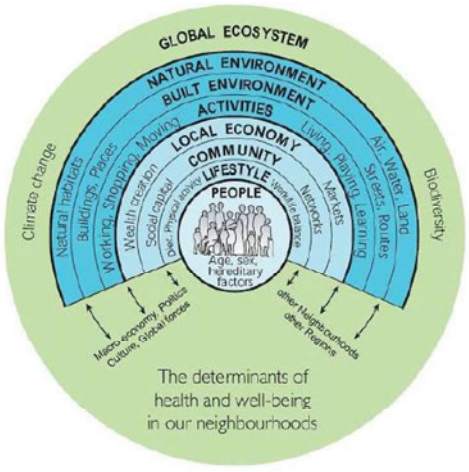
For inadvertent intrusion, the dose if the intrusion occurs should be presented. It is recommended that the post-closure phase be considered as a series of timescales, with the approach changing from more quantitative to more qualitative as times further in the future are considered.

The level of detail and sophistication in the modelling should also reflect the level of hazard presented by the waste. The uncertainty due to the long timescales means that the concept of collective dose has very limited use, although estimates of collective dose from the 'expected' migration scenario can be used to compare the relatively early impacts from some disposal options if required.

Wider Determinants of Health

World Health Organization (WHO's) defines health as "a state of complete physical, mental and social well-being and not merely an absence of disease or infirmity" (WHO, 1948).

The health of an individual or a population is the result of a complex interaction of a wide range of different determinants of health, from an individual's genetic make-up, to lifestyles and behaviours, and the communities, local economy, built and natural environments to global ecosystem trends. All developments will have some effect on the determinants of health, which in turn will influence the health and wellbeing of the general population, vulnerable groups and individual people.



Barton and Grant[23]

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[22] HPA RCE-8, Radiological Protection Objectives for the Land-based Disposal of Solid Radioactive Wastes, February 2009

[23] Barton H, Grant M. A health map for the local human habitat. The Journal of the Royal Society for the Promotion of Health 2006; 126(6): 252-3.

PHE recognises that evaluating an NSIP's impacts on health through the wider determinants is more complex than assessing a project's direct impacts against clearly defined regulatory protections (e.g. protected species). However, this does not mean that their assessment should be side-lined; with the 2017 EIA Regulations clarifying that the likely significant effects of a development proposal on human health must be assessed.

We accept that the relevance of these topics and associated impacts will vary depending on the nature of the proposed development and in order to assist applicants PHE has focused its approach on scoping determinants of health and wellbeing under four themes, which have been derived from an analysis of the wider determinants of health mentioned in the National Policy Statements. PHE has developed a list of 21 determinants of health and wellbeing under four broad themes, which have been derived from an analysis of the wider determinants of health mentioned in the National Policy Statements (NPS). If the applicant proposes to scope any areas out of the assessment, they should provide clear reasoning and justification.

The four themes are:
- Access
- Traffic and Transport
- Socioeconomic
- Land Use

Methodology

PHE will expect assessments to set out the methodology used to assess each determinant included in the scope of the assessment. In some instances, the methodologies described may be established and refer to existing standards and/or guidance. In other instances, there may be no pre-defined methodology, which can often be the case for the wider determinants of health; as such there should be an application of a logical impact assessment method that:

- identifies effected populations vulnerable to impacts from the relevant determinant
- establishes the current baseline situation
- identifies the NSIP's potential direct and indirect impacts on each population
- if impacts are identified, evaluates whether the potential impact is significant in relation to the affected population
- identifies appropriate mitigation to minimise impacts or the subsequent effects on health
- identifies opportunities to achieve benefits from the scheme
- identifies appropriate monitoring programmes

Currently there is no standard methodology for assessing the population and human health effects of infrastructure projects, but a number of guides exist, including:

- Institute of Environmental Management and Assessment, 2017: Health in Environmental Assessment, a primer for a proportionate approach;
- NHS London Healthy Urban Development Unit (HUDU), 2015. Healthy Urban Planning Checklist and Rapid Health Impact Assessment Tool;
- Wales Health Impact Assessment Unit, 2012: HIA a practical guide;
- National Mental Wellbeing Impact Assessment Development Unit 2011: Mental Wellbeing Impact Assessment Toolkit;

Determining Significant Effects

Neither the EIA regulations nor the National Policy Statements provide a definition of what constitutes a 'significant' effect, and so PHE have derived a list of factors which it will take into consideration in the assessment of significance of effects, as outlined below. these list of factors should be read in conjunction with guidance from the above guides.

1. Sensitivity:

Is the population exposed to the NSIP at particular risk from effects on this determinant due to pre-existing vulnerabilities or inequalities (for example, are there high numbers in the local population of people who are young, older, with disabilities or long-term conditions, or on a low income)? Will the NSIP widen existing inequalities or introduce new inequalities in relation to this determinant?

2. Magnitude:

How likely is the impact on this determinant to occur? If likely, will the impact affect a large number of people / Will the impact affect a large geographic extent? Will the effects be frequent or continuous? Will the effects be temporary or permanent and irreversible?

3. Cumulative effects:

Will the NSIP's impacts on this determinant combine with effects from other existing or proposed NSIPs or large-scale developments in the area, resulting in an overall cumulative effect different to that of the project alone?

What are the cumulative effects of the impacts of the scheme on communities or populations. Individual impacts individually may not be significant but in combination may produce an overall significant effect.

4. Importance:

Is there evidence for the NSIP's effect on this determinant on health? Is the impact on this determinant important in the context of national, regional or local policy?

5. Acceptability:

What is the local community's level of acceptance of the NSIP in relation to this determinant? Do the local community have confidence that the applicants will promote positive health impacts and mitigate against negative health effects?

6. Opportunity for mitigation:

If this determinant is included in the scope for the EIA is there an opportunity to enhance any positive health impacts and/or mitigate any negative health impacts?

Scoping

The scoping report may determine that some of the wider determinants considered under human and population health can be scoped out of the EIA. If that, should be the case, detailed rationale and supporting evidence for any such exclusions must be provided. PHE will expect an assessment to have considered all of the determinants listed in Table1 of Appendix 1 as a minimum.

Vulnerable Groups

Certain parts of the population may experience disproportionate negative health effects as a result of a development. Vulnerable populations can be identified through research literature, local population health data or from the identification of pre-existing health conditions that increase vulnerability.

The on health and wellbeing and health inequalities of the scheme will have particular effect on vulnerable or disadvantaged populations, including those that fall within the list of protected characteristics. Some protected groups are more likely to have elevated vulnerability associated with social and economic disadvantages. Consideration should be given to language or lifestyles that influence how certain populations are affected by impacts of the proposal, for example non-English speakers may face barriers to accessing information about the works or expressing their concerns.

Equality Impact Assessments (EqIA) are used to identify disproportionate effects on Protected Groups (defined by the Equality Act, 2010), including health effects. The assessments and findings of the Environmental Statement and the EqIA should be crossed reference between the two documents, particularly to ensure the assessment of potential impacts for health and inequalities and that resulting mitigation measures are mutually supportive.

The Wales Health Impact Assessment Support Unit (WHIASU), provides a suggested list of vulnerable groups

Age related groups
• Children and young people
• Older people
Income related groups
• People on low income
• Economically inactive
• Unemployed/workless
• People who are unable to work due to ill health

Groups who suffer discrimination or other social disadvantage
• People with physical or learning disabilities/difficulties
• Refugee groups
• People seeking asylum
• Travellers
• Single parent families
• Lesbian and gay and transgender people
• Black and minority ethnic groups
• Religious groups

Geographical groups
• People living in areas known to exhibit poor economic and/or health indicators
• People living in isolated/over-populated areas
• People unable to access services and facilities

Mental Health

PHE supports the use of the broad definition of health proposed by the World Health Organisation (WHO). Mental well-being is fundamental to achieving a healthy, resilient and thriving population. It und4erpins healthy lifestyles, physical health, educational attainment, employment and productivity, relationships, community safety and cohesion and quality of life. NSIP schemes can be of such scale and nature that will impact on the over-arching protective factors, which are:
• Enhancing control
• Increasing resilience and community assets
• Facilitating participation and promoting inclusion.

There should be parity between mental and physical health, and any assessment of health impact should include the appreciation of both. A systematic approach to the assessment of the impacts on mental health, including suicide, is required. The **Mental Well-being Impact Assessment (MWIA)** could be used as a methodology. The assessment should identify vulnerable populations and provide clear mitigation strategies that are adequately linked to any local services or assets

Perceptions about the proposed scheme may increase the risk of anxiety or health effects by perceived effects. "Estimation of community anxiety and stress should be included as part of every risk or impact assessment of proposed plans that involve a potential environmental hazard.

Evidence Base and Baseline Data

An assessment should be evidence based, using published literature to identify determinants and likely health effects. The strength of evidence identifying health effects can vary, but where the evidence for an association is weak it should not automatically be discounted.

There will be a range of publicly available health data including:

- National datasets such as those from the Office of National Statistics,
- Public Health England (PHE), including the fingertips data sets,
- Non-governmental organisations,
- Local public health reports, such as the Joint Strategic Needs Assessment, Health and Wellbeing Strategies;
- Consultation with local authorities, including local authority public health teams;

- Information received through public consultations

Mitigation

If the assessment has identified that significant negative effects are likely to occur with respect to the wider determinants of health, the assessment should include a description of planned mitigation measures the applicant will implement to avoid or prevent effects on the population.

Mitigation and/or monitoring proposals should be logical, feasible and have a clear governance and accountability framework indicating who will be responsible for implementation and how this will be secured during the construction and/or operation of the NSIP.

Positive Benefits from the Scheme

The scale of many NSIP developments will generate the potential for positive impacts on health and wellbeing; however, delivering such positive health outcomes often requires specific enabling or enhancement measures. For example, the construction of a new road network to access an NSIP site may provide an opportunity to improve the active transport infrastructure for the local community. PHE expects developments to consider and report on the opportunity and feasibility of positive impacts. These may be stand alone or be considered as part of the mitigation measures.

Monitoring

PHE expects an assessment to include consideration of the need for monitoring. It may be appropriate to undertake monitoring where:

- Critical assumptions have been made
- There is uncertainty about whether negative impacts are likely to occur as it may be appropriate to include planned monitoring measures to track whether impacts do occur.
- There is uncertainty about the potential success of mitigation measures
- It is necessary to track the nature of the impact and provide useful and timely feedback that would allow action to be taken should negative impacts occur

How to contact PHE

If you wish to contact us regarding an existing or potential NSIP application please email: nsipconsultations@phe.gov.uk

Appendix 1

Table 1 – Wider determinants of health and wellbeing

Health and wellbeing themes			
Access	Traffic and Transport	Socioeconomic	Land Use
Wider determinants of health and wellbeing			
Access to : • local public and key services and facilities. • Good quality affordable housing. • Healthy affordable food. • The natural environment. • The natural environment within the urban environment. • Leisure, recreation and physical activities within the urban and natural environments.	• Accessibility. • Access to/by public transport. • Opportunities for access by cycling and walking. • Links between communities. • Community severance. • Connections to jobs. • Connections to services, facilities and leisure opportunities.	• Employment opportunities, including training opportunities. • Local business activity. • Regeneration. • Tourism and leisure industries. • Community/social cohesions and access to social networks. • Community engagement.	• Land use in urban and/or /rural settings. • Quality of Urban and natural environments

1) **Access**

a. Access to local, public and key services and facilities

Access to local facilities can increase mobility and social participation. Body mass index is significantly associated with access to facilities, including factors such as the mix and density of facilities in the area. The distance to facilities has no or only a small effect on walking and other physical activities. Access to recreational facilities can increase physical activity, especially walking for recreation, reduce body weight, reduce the risk of high blood pressure, and reduce the number of vehicle trips, the distances travelled and greenhouse gas emissions.

Local services include health and social care, education, employment, and leisure and recreation. Local facilities include community centres, shops, banks/credit unions and Post Offices. Services and facilities can be operated by the public, private and/or voluntary sectors. Access to services and facilities is important to both physical and mental health and wellbeing. Access is affected by factors such as availability,

proximity to people's place of residence, existence of transport services or active travel infrastructure to the location of services and facilities, and the quality of services and facilities.

The construction or operation of an NSIP can affect access adversely: it may increase demand and therefore reduce availability for the existing community; during construction, physical accessibility may be reduced due to increased traffic and/or the blockage of or changes to certain travel routes. It is also possible that some local services and facilities are lost due to the land-take needed for the NSIP.

Conversely if new routes are built or new services or facilities provided the NSIP may increase access. NSIPs relating to utilities such as energy and water can maintain, secure or increase access to those utilities, and thereby support health and wellbeing.

b. Access to good-quality affordable housing

Housing refurbishment can lead to an improvement in general health and reduce health inequalities. Housing improvements may also benefit mental health. The provision of diverse forms and types of housing is associated with increased physical activity. The provision of affordable housing is strongly associated with improved safety perceptions in the neighbourhood, particularly among people from low-income groups. For vulnerable groups, the provision of affordable housing can lead to improvements in social, behavioural and health related outcomes. For some people with long term conditions, the provision of secure and affordable housing can increase engagement with healthcare services, which can lead to improved health-related outcomes. The provision of secure and affordable housing can also reduce engagement in risky health-related behaviours. For people who are homeless, the provision of affordable housing increases engagement with healthcare services, improves quality of life and increases employment, and contributes to improving mental health.

Access to housing meets a basic human need, although housing of itself is not necessarily sufficient to support health and wellbeing: it is also important that the housing is of good quality and affordable. Factors affecting the quality of housing include energy efficiency (eg effective heating, insulation), sanitation and hygiene (eg toilet and bathroom), indoor air quality including ventilation and the presence of damp and/or mould, resilience to climate change, and overcrowding. The affordability of housing is important because for many people, especially people on a low income, housing will be the largest monthly expense; if the cost of housing is high, people may not be able to meet other needs such as the need for heating in winter or food. Some proposals for NSIPs include the provision of housing, which could be beneficial for the health and wellbeing of the local population. It is also possible that some housing will be subject to a compulsory purchase order due to the land-take needed for an NSIP.

c. Access to affordable healthy food

Access to healthy food is related to the provision of public and active transport infrastructure and the location and proximity of outlets selling healthier food such as fruit and vegetables. For the general population, increased access to healthy, affordable food through a variety of outlets (shops, supermarkets, farmers' markets and community gardens) is associated with improved dietary behaviours, including attitudes towards healthy eating and food purchasing behaviour, and improved adult weight. Increased access to unhealthier food retail outlets is associated with increased weight in the general population and increased obesity and unhealthy eating behaviours among children living in low-income areas. Urban agriculture can improve attitudes towards healthier food and increase fruit and vegetable consumption.

Factors affecting access to healthy affordable food include whether it is readily available from local shops, supermarkets, markets or delivery schemes and/or there are opportunities to grow food in local allotments or community gardens. People in environments where there is a high proportion of fast food outlets may not have easy access to healthy affordable food.

d. Access to the natural environment

Availability of and access to safe open green space is associated with increased physical activity across a variety of behaviours, social connectedness, childhood development, reduced risk of overweight and obesity and improved physical and mental health outcomes. While the quantity of green space in a neighbourhood helps to promote physical activity and is beneficial to physical health, eg lower rates of mortality from cardiovascular disease and respiratory disease in men, the availability of green environments is likely to contribute more to mental health than to physical health: the prevalence of some disease clusters, particularly anxiety and depression, is lower in living environments which have more green space within a 1-km radius.

The proximity, size, type, quality, distribution, density and context of green space are also important factors. Quality of green space may be a better predictor of health than quantity, and any type of green space in a neighbourhood does not necessarily act as a venue for, or will encourage, physical activity. 'Walkable' green environments are important for better health, and streetscape greenery is as strongly related to self-reported health as green areas. Residents in deprived areas are more likely to perceive access to green space as difficult, to report poorer safety, to visit the green space less frequently and to have lower levels of physical activity. The benefits to health and wellbeing of blue space include lower psychological distress.

The natural environment includes the landscape, waterscape and seascape. Factors affecting access include the proximity of the natural environment to people's place of residence, the existence of public transport services or active travel infrastructure to the natural environment, the quality of the natural environment and feelings of safety in the natural environment. The construction of an NSIP may be an opportunity to provide green and/or blue infrastructure in the local area. It is also possible that green or blue infrastructure will be lost due to the land-take needed for the NSIP.

e. Access to the natural environment within the urban environment

Public open spaces are key elements of the built environment. Ecosystem services through the provision of green infrastructure are as important as other types of urban infrastructure, supporting physical, psychological and social health, although the quality and accessibility of green space affects its use, C19, ethnicity and perceptions of safety. Safe parks may be particularly important for promoting physical activity among urban adolescents. Proximity to urban green space and an increased proportion of green space are associated with decreased treatment of anxiety/mood disorders, the benefits deriving from both participation in usable green space near to home and observable green space in the neighbourhood. Urban agriculture may increase opportunities for physical activity and social connections.

A view of 'greenery' or of the sea moderates the annoyance response to noise. Water is associated with positive perceptive experiences in urban environments, with benefits for health such as enhanced contemplation, emotional bonding, participation and physical activity. Increasing biodiversity in urban environments, however, may promote the introduction of vector or host organisms for infectious pathogens, eg green connectivity may potentiate the role of rats and ticks in the spread of disease, and bodies of water may provide habitats for mosquitoes. Owing to economic growth,

population size and urban and industrial expansion in the EU, to maintain ecosystem services at 2010 levels, for every additional percentage increase in the proportion of 'artificial' land, there needs to be a 2.2% increase in green infrastructure.

The natural environment within the urban environment includes the provision of green space and blue space in towns and cities. Factors involved in access include the proximity of the green and/or blue space to people's place of residence, the existence of transport services or active travel infrastructure to the green and/or blue space, the quality of the green and/or blue space and feelings of safety when using the green and/or blue space. The construction of an NSIP may be an opportunity to provide green and/or blue infrastructure in the local urban environment. It is also possible that green or blue infrastructure in the urban environment will be lost due to the land-take needed for the NSIP.

f. Access to leisure, recreation and physical activity opportunities within the urban and natural environments.

Access to recreational opportunities, facilities and services is associated with risk factors for long-term disease; it can increase physical activity, especially walking for recreation, reduce body mass index and overweight and obesity, reduce the risk of high blood pressure, and reduce the number of vehicle trips, the distances travelled and greenhouse gas emissions. It can also enhance social connectedness. Children tend to play on light-traffic streets, whereas outdoor activities are less common on high-traffic streets. A perception of air pollution can be a barrier to participating in outdoor physical activity. There is a positive association between urban agriculture and increased opportunities for physical activity and social connectivity. Gardening in an allotment setting can result in many positive physical and mental health-related outcomes. Exercising in the natural environment can have a positive effect on mental wellbeing when compared with exercising indoors.

Leisure and recreation opportunities include opportunities that are both formal, such as belonging to a sports club, and informal, such as walking in the local park or wood. Physical activity opportunities include routine activity as part of daily life, such as walking or cycling to work, and activity as part of leisure or recreation, such as playing football. The construction of an NSIP may enhance the opportunities available for leisure and recreation and physical activity through the provision of new or improved travel routes, community infrastructure and/or green or blue space. Conversely, construction may reduce access through the disruption of travel routes to leisure, recreation and physical activity opportunities.

2) **Traffic and Transport**

a. Accessibility

Walkability, regional accessibility, pavements and bike facilities are positively associated with physical activity and negatively related to body weight and high blood pressure, and reduce the number of vehicle trips, the distances travelled and greenhouse gas emissions. Body mass index is associated with street network accessibility and slope variability.

Accessibility in relation to transport and travel has several aspects including whether potential users can gain physical access to the infrastructure and access to the services the infrastructure provides. The design and operation of transport infrastructure and the associated services should take account of the travel needs of all potential users including people with limited mobility. People whose specific needs should be considered include pregnant women, older people, children and young

people and people with a disability. Other aspects of transport infrastructure affecting accessibility include safety and affordability, both of which will affect people's ability to travel to places of employment and/or key local services and facilities and/or access their social networks.

b. Access to / by public transport

Provision of high-quality public transport is associated with higher levels of active travel among children and among people commuting to work, with a decrease in the use of private cars. Combining public transport with other forms of active travel can improve cardiovascular fitness. Innovative or new public transport interventions may need to be marketed and promoted differently to different groups of transport users, eg by emphasising novelty to car users while ensuring that the new system is seen by existing users as coherently integrated with existing services.

Transport facilitates access to other services, facilities and amenities important to health and wellbeing. Public transport is any transport open to members of the public including bus, rail and taxi services operated by the public, private or community sectors. For people who do not have access to private transport, access to public transport is important as the main agency of travel especially for journeys >1 mile. Access to public transport is not sufficient, however, and access by public transport needs to be taken into account: public transport services should link places where people live with the destinations they need or want to visit such as places of employment, education and healthcare, shops, banks and leisure facilities. Other aspects of access to public transport include affordability, safety, frequency and reliability of services.

c. Opportunities for / access by cycling & walking

Walking and cycling infrastructure can enhance street connectivity, helping to reduce perceptions of long-distance trips and providing alternative routes for active travel. Prioritising pedestrians and cyclists through changes in physical infrastructure can have positive behavioural and health outcomes, such as physical activity, mobility and cardiovascular outcomes. The provision and proximity of active transport infrastructure is also related to other long-term disease risk factors, such as access to healthy food, social connectedness and air quality. The perception of air pollution, however, appears to be a barrier to participating in active travel.

Perceived or objective danger may also have an adverse effect on cycling and walking, both of which activities decrease with increasing traffic volume and speed, and cycling for leisure decreases as local traffic density increases. Health gains from active travel policies outweigh the adverse effects of road traffic incidents. New infrastructure to promote cycling, walking and the use of public transport can increase the time spent cycling on the commute to work, and the overall time spent commuting among the least-active people. Active travel to work or school can be associated with body mass index and weight, and may reduce cardiovascular risk factors and improve cardiovascular outcomes. The distance of services from cycle paths can have an adverse effect on cycling behaviour, whereas mixed land use, higher densities and reduced distances to non-residential destinations promote transportation walking.

d. Links between communities

Social connectedness can be enhanced by the provision of public and active transport infrastructure and the location of employment, amenities, facilities and services.

e. Community severance

In neighbourhoods with high volumes of traffic, the likelihood of people knowing and trusting neighbours is reduced.

f. Connections to jobs

The location of employment opportunities and the provision of public and active transportation infrastructure are associated with risk factors for long-term disease such as physical activity. Good pedestrian and cycling infrastructure can promote commuting physical activity. Improved transport infrastructure has the potential to shift the population distribution of physical activity in relation to commuting, although a prerequisite may be a supportive social environment. Mixed land use, higher densities and reduced distances to non-residential destinations promote transportation walking.

The ease of access to employment, shops and services including the provision of public and active transport are important considerations and schemes should take any opportunity to improve infrastructure to promote cycling, walking and the use of public transport

g. Connections to services, facilities and leisure opportunities

Mixed land use, higher densities and reduced distances to non-residential destinations promote transportation walking. Access to recreational opportunities and the location of shops and services are associated with risk factors for long-term disease such as physical activity, access to healthy food and social connectedness. Increased distance of services from cycle paths can have an adverse effect on cycling behaviour.

3) **Socio Economic**

a. Employment opportunities including training opportunities

Employment is generally good for physical and mental health and well-being, and worklessness is associated with poorer physical and mental health and well-being. Work can be therapeutic and can reverse the adverse health effects of unemployment for healthy people of working age, many disabled people, most people with common health problems and social security beneficiaries. Account must be taken of the nature and quality of work and its social context and jobs should be safe and accommodating. Overall, the beneficial effects of work outweigh the risks of work and are greater than the harmful effects of long-term unemployment or prolonged sickness absence. Employment has a protective effect on depression and general mental health.

Transitions from unemployment to paid employment can reduce the risk of distress and improve mental health, whereas transitions into unemployment are psychologically distressing and detrimental to mental health. The mental health benefits of becoming employed are also dependent on the psychosocial quality of the job, including level of control, demands, complexity, job insecurity and level of pay: transition from unemployment to a high-quality job is good for mental health, whereas transition from unemployment to a low-quality job is worse for mental health than being unemployed. For people receiving social benefits, entry into paid employment can improve quality of life and self-rated health (physical, mental, social) within a short time-frame. For people receiving disability benefits, transition into employment can improve mental and physical health. For people with mental health needs, entry into employment reduces the use of mental health services.

For vocational rehabilitation of people with severe mental illness (SMI), Supported Employment is more effective than Pre-vocational Training in helping clients obtain

competitive employment; moreover, clients in Supported Employment earn more and work more hours per month than those in Pre-vocational Training.

b. Local Business Activity

It is important to demonstrate how a proposed development will contribute to ensuring the vitality of town centres. Schemes should consider the impact on local employment, promote beneficial competition within and between town centres, and create attractive, diverse places where people want to live, visit and work

In rural areas the applicant should assess the impact of the proposals on a prosperous rural economy, demonstrate how they will support the sustainable growth and expansion of all types of business and enterprise in rural areas, promoting the development and diversification of agricultural and other land based rural businesses.

c. Regeneration

Following rebuilding and housing improvements in deprived neighbourhoods, better housing conditions are associated with better health behaviours; allowing people to remain in their neighbourhood during demolition and rebuilding is more likely to stimulate life-changing improvements in health behaviour than in people who are relocated. The partial demolition of neighbourhoods does not appear to affect residents' physical or mental health. Mega-events, such as the Olympic Games, often promoted on the basis of their potential legacy for regeneration, appear to have only a short-term impact on mental health.

d. Tourism and Leisure Industries

The applicant should assess the impact of the proposed development on retail, leisure, commercial, office, tourism, cultural, community and residential development needed in town centres. In rural locations assessment and evaluation of potential impacts on sustainable rural tourism and leisure developments that benefit businesses in rural areas, communities and visitors should be undertaken.

e. Community / social cohesion and access to social networks

The location of employment, shops and services, provision of public and active transport infrastructure and access to open space and recreational opportunities are associated with social connectedness. Access to local amenities can increase social participation. Neighbourhoods that are more walkable can increase social capital. Urban agriculture can increase opportunities for social connectivity. Infrastructure developments, however, can affect the quality of life of communities living in the vicinity, mediated by substantial community change, including feelings of threat and anxiety, which can lead to psychosocial stress and intra-community conflict.

f. Community engagement

Public participation can improve environmental impact assessments, thereby increasing the total welfare of different interest groups in the community. Infrastructure development may be more acceptable to communities if it involves substantial public participation.

4) **Land Use**

a. Land use in urban and / or rural settings

Land-use mix including infrastructure:

Land use affects health not only by shaping the built environment, but also through the balance of various types of infrastructure including transport. Vulnerable groups in the population are disproportionately affected by decisions about land use, transport and the built environment. Land use and transport policies can result in negative health impacts due to low physical activity levels, sedentary behaviours, road traffic incidents, social isolation, air pollution, noise and heat. Mixed land use can increase both active travel and physical activity. Transportation walking is related to land-use mix, density and distance to non-residential destinations; recreational walking is related to density and mixed use. Using modelling, if land-use density and diversity are increased, there is a shift from motorised transport to cycling, walking and the use of public transport with consequent health gain from a reduction in long-term conditions including diabetes, cardiovascular disease and respiratory disease.

Proximity to infrastructure:
Energy resource activities relating to oil, gas and coal production and nuclear power can have a range of negative effects on children and young people. Residing in proximity to motorway infrastructure can reduce physical activity. For residents in proximity to rail infrastructure, annoyance is mediated by concern about damage to their property and future levels of vibration. Rural communities have concerns about competing with unconventional gas mining for land and water for both the local population and their livestock."

b. Quality of urban and natural environments

Long-term conditions such as cardiovascular disease, diabetes, obesity, asthma and depression can be moderated by the built environment. People in neighbourhoods characterised by high 'walkability' walk more than people in neighbourhoods with low 'walkability' irrespective of the land-use mix. In neighbourhoods associated with high 'walkability' there is an increase in physical activity and social capital, a reduction in overweight and blood pressure, and fewer reports of depression and of alcohol abuse. The presence of walkable land uses, rather than their equal mixture, relates to a healthy weight. Transportation walking is at its highest levels in neighbourhoods where the land-use mix includes residential, retail, office, health, welfare and community, and entertainment, culture and recreation land uses; recreational walking is at its highest levels when the land-use mix includes public open space, sporting infrastructure and primary and rural land uses. Reduced levels of pollution and street connectivity increase participation in physical activity.

Good-quality street lighting and traffic calming can increase pedestrian activity, while traffic calming reduces the risk of pedestrian injury. 20-mph zones and limits are effective at reducing the incidence of road traffic incidents and injuries, while good-quality street lighting may prevent them. Public open spaces within neighbourhoods encourage physical activity, although the physical activity is dependent on different aspects of open space, such as proximity, size and quality. Improving the quality of urban green spaces and parks can increase visitation and physical activity levels.

Living in a neighbourhood overlooking public areas can improve mental health, and residential greenness can reduce the risk of cardiovascular mortality. Crime and safety issues in a neighbourhood affect both health status and mental health. Despite the complexity of the relationship, the presence of green space has a positive effect on crime, and general environmental improvements may reduce the fear of crime. Trees can have a cooling effect on the environment – an urban park is cooler than a non-green site. Linking road infrastructure planning and green infrastructure planning can produce improved outcomes for both, including meeting local communities' landscape sustainability objectives.

Medworth Energy from Waste Combined Heat and Power Facility – proposed development by MVV Environment Ltd

Royal Mail Group Limited comments on information to be provided in applicant's Environmental Statement

Introduction

Reference the letter from PINS to Royal Mail dated 5 December 2019 requesting Royal Mail's comments on the information that should be provided in MVV Environment Ltd's Environmental Statement.

Royal Mail's consultants BNP Paribas Real Estate have reviewed the applicant's Scoping Report, scrutinising the proposed development and its potential impacts on Royal Mail's business interests.

Royal Mail– relevant information

Under section 35 of the Postal Services Act 2011 (the "Act"), Royal Mail has been designated by Ofcom (the independent communications regulator) as a provider of the Universal Postal Service.

Royal Mail is the only such provider in the United Kingdom. Its services are regulated by the Communications Industry Regulator, Ofcom.

In respect of its postal services functions, section 29 of the Act provides that Ofcom's primary regulatory duty is to secure the provision of the Universal Postal Service. Ofcom discharges this duty by imposing regulatory conditions on Royal Mail, requiring it to provide the Universal Postal Service.

By sections 30 and 31 of the Act (read with sections 32 and 33) there is a set of minimum standards for Universal Service Providers, which Ofcom must secure. The conditions imposed by Ofcom reflect those standards. There is, in effect, a statutory obligation on Royal Mail to provide at least one collection from letterboxes and post offices six days a week and one delivery of letters to all 29 million homes and businesses in the UK six days a week (five days a week for parcels). Royal Mail must also provide a range of "end to end" services meeting users' needs, e.g. First Class, Second Class, Special Delivery by 1 pm, International and Redirections services.

Royal Mail is under some of the highest specification performance obligations for quality of service in Europe. Its performance of the Universal Service Provider obligations is in the public interest and should not be affected detrimentally by any statutorily authorised project.

Royal Mail's postal sorting and delivery operations rely heavily on road communications. Royal Mail's ability to provide efficient mail collection, sorting and delivery to the public is sensitive tc changes in the capacity of the highway network.

Royal Mail is a major road user nationally. Disruption to the highway network and traffic delays can have direct consequences on Royal Mail's operations, its ability to meet the Universal Service Obligation and comply with the regulatory regime for postal services thereby presenting a significant risk to Royal Mail's business.

Potential impacts of the scheme on Royal Mail

Royal Mail has two operational facilities within 10 miles of the proposed DCO boundary as listed below:

Site	Address	Distance
WISBECH DELIVERY OFFICE	Cromwell Court, Wisbech, PE14 0RA	0.6m
MARCH DELIVERY OFFICE	Dartford Road, March, PE15 8AA	9.3m

The nearby section of the A47 is a strategically important distribution route for Royal Mail services, important to mail handling and delivery at the regional and national levels. All Royal Mail vehicles / services that use the affected sections of the A47 and the A1101 are at risk of delays during the construction period.

In exercising its statutory duties, Royal Mail vehicles use the A47, the A1101 and all of the adjacent local roads on a daily basis. Any additional congestion on these roads during the construction phase has the potential to significantly disrupt Royal Mail's operations.

Royal Mail therefore wishes to ensure the protection of its future ability to provide an efficient mail sorting and delivery service to the public in accordance with its statutory obligations which may be adversely affected by the construction of this proposed scheme.

Royal Mail's comments on information that should be provided in the applicant's Environmental Statement

Royal Mail fully supports the objectives of the proposed scheme but requests that in preparing the Environmental Statement MVV Environment Ltd fully notes the above and addresses the following comments / requests:

1. Royal Mail requests that the Environmental Statement includes information on the needs of major road users (such as Royal Mail) and acknowledges the requirement to ensure that major road users are not disrupted though full consultation at the appropriate time in the DCO and development processes.

2. The Environmental Statement should include detailed information on the construction traffic mitigation measures that are proposed to be implemented, including a draft Construction Traffic Management Plan (CTMP).

3. Royal Mail requests that it is fully pre-consulted by MVV Environment Ltd or its contractors on any proposed road closures / diversions/ alternative access arrangements, hours of working and the content of the CTMP. The Environmental Statement should acknowledge the need for this consultation with Royal Mail and other relevant local businesses / occupiers.

Royal Mail is able to supply the applicant with information on its road usage / trips if required.

Should PINS or MVV Environment Ltd have any queries in relation to the above then in the first instance please contact Daniel Parry-Jones [redacted] of BNP Paribas Real Estate.

Date: 3 January 2020
Enquiries to: Graham Gunby
[redacted]

Suffolk County Council

Major Casework Directorate
Temple Quay House
2 The Square
Bristol, BS1 6PN
Medworth@planninginspectorate.gov.uk
FAO. Karen Wilson

Dear Ms Wilson

Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017(the EIA Regulations) – Regulations 10 and 11

Application by MVV Environment Ltd (the Applicant) for an Order granting Development Consent for the Medworth Energy from Waste Combined Heat and Power Facility (the Proposed Development)

Scoping consultation and notification of the Applicant's contact details and duty to make available information to the Applicant if requested

Thank you for your letter of the 5 December regarding the above. I note however that you have consulted Suffolk County Council over the period of the Christmas and New Year Holiday and therefore I am unable to make any comments at this stage as the relevant colleagues are on annual leave. If you are able to extend the deadline, I will however be in a position to make relevant comments.

Yours sincerely,

[redacted]

Graham Gunby
Development Manager
Growth, Highways & Infrastructure

From: [redacted]
To: Medworth
Subject: Re: EN011100 Medworth Energy from Waste Combined Heat and Power Facility EIA Scoping Notification and Consultation.
Date: 20 December 2019 10:12:38

Walpole Parish Council
Clerk - Mrs E Bateman
[redacted]

Walpole Parish Council has concerns about extra traffic that will be generated by the proposed development on already congested roads in and around Wisbech. Concerns have also been raised regarding emissions from the proposed development that may affect residents of Walpole Parish and surrounding parishes to the proposed site.

Kind Regards
Emma Bateman
Clerk to the Parish Council

Please note that as from 9th January 2020, the Clerk to Walpole Parish Council will be Caroline Boyden - telephone [redacted]

From: Medworth <Medworth@planninginspectorate.gov.uk>
Sent: 05 December 2019 11:51

[redacted]

Subject: EN011100 Medworth Energy from Waste Combined Heat and Power Facility EIA Scoping Notification and Consultation.

Dear Sir/Madam

Please see attached correspondence on the proposed Medworth Energy from Waste Combined Heat and Power Facility.

Please note the deadline for consultation responses is Friday 3 January 2020 and is a statutory requirement that cannot be extended.

Regards

Karen

Karen Wilkinson
EIA and Land Rights Advisor
Major Casework Directorate
The Planning Inspectorate, Temple Quay House, Temple Quay, Bristol BS1 6PN

Twitter: @PINSgov
Helpline: 0303 444 5000
Email: Medworth@planninginspectorate.gov.uk

Web: https://infrastructure.planninginspectorate.gov.uk/ (National Infrastructure Planning)

From: Int Planning Help
To: Medworth
Subject: RE: AB - FW: EN010110 Medworth Energy from Waste Combined Heat and Power Facility EIA Scoping Consultation
Date: 10 December 2019 08:59:23

Dear Ms Wilkinson

Thank you for your email and consultation letter, West Suffolk Council have no comments to make.

Regards

Alexa Burlow
Technical Support (Planning)
Systems & Technical Support
[redacted]
www.westsuffolk.gov.uk
West Suffolk Council
#TeamWestSuffolk

Report, pay and apply online 24 hours a day
Find my nearest for information about your area

From: customer.services <customer.services@westsuffolk.gov.uk>
Sent: 05 December 2019 15:53
To: Int.Planning.Help <int.planning.help@westsuffolk.gov.uk>
Subject: AB - FW: EN010110 Medworth Energy from Waste Combined Heat and Power Facility EIA Scoping Consultation

From: Medworth <Medworth@planninginspectorate.gov.uk>
Sent: 05 December 2019 15:53
Subject: EN010110 Medworth Energy from Waste Combined Heat and Power Facility EIA Scoping Consultation

[THIS IS AN EXTERNAL EMAIL]

Dear Head of Planning

Please see attached correspondence on the proposed Medworth Energy from Waste Combined Heat and Power Facility.

Please note the deadline for consultation responses is Friday 3 January 2020 and is a statutory requirement that cannot be extended.

Regards

Karen

Karen Wilkinson
EIA and Land Rights Advisor
Major Casework Directorate
The Planning Inspectorate, Temple Quay House, Temple Quay, Bristol BS1 6PN

Twitter: @PINSgov
Helpline: 0303 444 5000
Email: Medworth@planninginspectorate.gov.uk

Web: https://infrastructure.planninginspectorate.gov.uk/ (National Infrastructure Planning)

From: [redacted]
To: Medworth
Subject: Re: EN011100 Medworth Energy from Waste Combined Heat and Power Facility EIA Scoping Notification and Consultation.
Date: 23 December 2019 11:29:49

West Walton Parish Council

Clerk - Mrs E Bateman [redacted]

West Walton Parish Council has no comments in respect of the Scoping consultation and notification of the Applicant's contact details and duty to make available information to the Applicant if requested.

Kind Regards
Emma Bateman
Clerk to West Walton Parish Council

From: Medworth <Medworth@planninginspectorate.gov.uk>
Sent: 05 December 2019 11:51

[redacted]

[redacted]

Subject: EN011100 Medworth Energy from Waste Combined Heat and Power Facility EIA Scoping Notification and Consultation.

Dear Sir/Madam

Please see attached correspondence on the proposed Medworth Energy from Waste Combined Heat and Power Facility.

Please note the deadline for consultation responses is Friday 3 January 2020 and is a statutory requirement that cannot be extended.

Regards

Karen

Karen Wilkinson
EIA and Land Rights Advisor
Major Casework Directorate
The Planning Inspectorate, Temple Quay House, Temple Quay, Bristol BS1 6PN

Twitter: @PINSgov
Helpline: 0303 444 5000
Email: Medworth@planninginspectorate.gov.uk

Web: https://infrastructure.planninginspectorate.gov.uk/ (National Infrastructure Planning)

From:	Wisbech Town Council
To:	Medworth
Subject:	Application by MVV Environment Ltd for an Order granting Development Consent for the Medworth Energy from Waste Combined Heat and Power Facility
Date:	17 December 2019 14:58:03

This matter was considered by Wisbech Town Council's Planning and Community Infrastructure Committee yesterday evening. The response of the committee is : "Members decided that the Planning Inspectorate be informed that Wisbech Town Council opposes this development proposal. The council is of the opinion that implementation of the proposal would have an adverse impact upon the health of people living in Wisbech and place considerable pressure upon the existing highway infrastructure in the town. Furthermore, the council has no desire for Wisbech to become the recipient of waste materials generated by other towns and villages. In addition, members consider that this development, which would, in their opinion, bring no benefits for the local community, is not needed in Wisbech".

Regards.

Terry Jordan
Clerk to Wisbech Town Council

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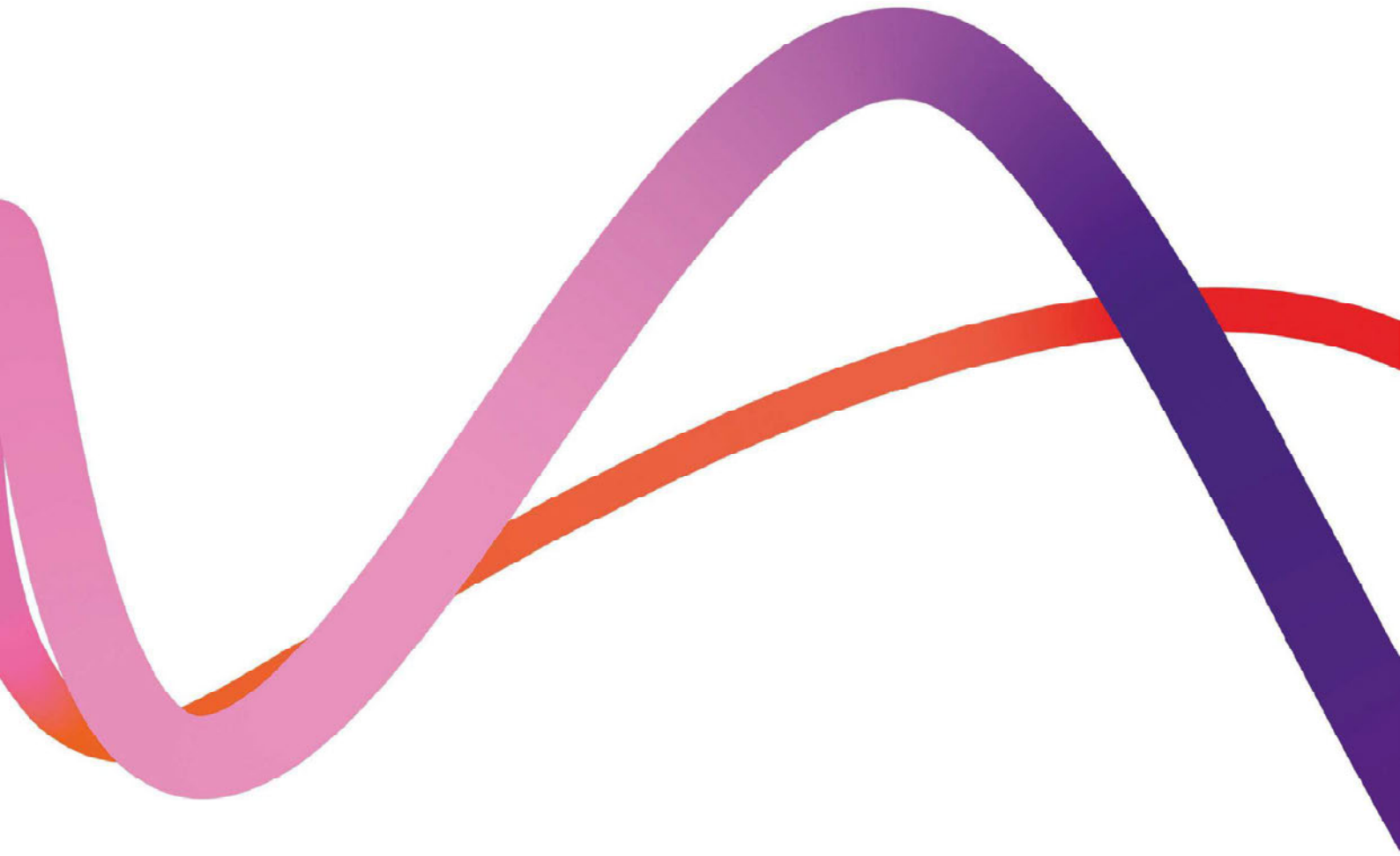


Medworth Energy from Waste
Combined Heat and Power Facility

PINS ref. EN010110
Document Reference: Vol 6.4
Revision 1.0
June 2022

Environmental Statement Chapter 1 Introduction Appendix 1E Late Scoping Consultation Response

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

We inspire with energy.

Your ref: EN010110
Our ref: Medworth EfW
Please ask for: Hannah Wood-Handy
[redacted]

Borough Council of
King's Lynn &
West Norfolk

Geoff Hall
Executive Director

Stuart Ashworth
Assistant Director Environment and Planning

The Planning Inspectorate
Major Casework Directorate
Temple Quay House
2 The Square
Bristol
BS1 6PN

FAO Karen Wilkinson
EIA and Land Rights Advisor

20 February 2020

Dear Ms Wilkinson

Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) – Regulations 10 and 11

Application for MVV Environment Ltd (the Applicant) for an Order granting Development Consent for the Medworth Energy from Waste Combined Heat and Power Facility

Scoping Consultation

I refer to your letter dated 5 December 2019 regarding the above. The Planning Inspectorate has issued its Scoping Response in accordance with the statutory time limits. However, I understand that the Borough Council's comments will be forwarded to the Applicant for information. The comments made are a combined response between Planning and Environmental Health and relate to the project as a whole rather than the specific aspects of the grid connection that is located within the administrative boundary of the Borough Council.

Chapter 5 - Traffic and Transport

With regard to Traffic and Transport, we agree with the Inspectorate's comments that the developer should consider an alternative route to the site from the South along New Bridge Lane, instead of the proposed route along Elm High Road. The air quality implications of this new access route should be included within the EIA. Furthermore, we agree that more detail is required with regard to the number, type and timings of vehicle movements accessing the site during both the construction and operational phases.

Chapter 6 – Noise and vibration

With regard to Noise and Vibration we note and agree with Fenland District Council's Chapter 6 of their scoping consultation. Whilst KLWNBC is not the immediate Local Authority some works in relation to this application will be undertaken in KLWNBC district.

It is noted in the Planning Inspectorates comments 2.2.4, 2.2.5 & 2.2.6 that the grid connection and its route is yet to be determined as authorised development in the DCO. The grid connection aspect of the development needs to have sufficient detail within the ES, such as proposed routes of pipes, lines and cables, any ancillary substations and the likely noise sensitive receptors to be affected by these works both in construction phases and once works are completed. Once the routes are determined and finalised then noise sensitive receptors can be identified and monitored accordingly. Mitigation methods to reduce and control noise and vibration at receptors throughout all phases of development should be identified in a construction and operational management plan.

Chapter 7 - Air Quality

The EIA Scoping Report contains a section on air quality, detailing the relevant legislation, pollutant objectives, data sources, receptors and methodology.

We agree with the Inspectorate's comments regarding Air Quality Management Areas (AQMAs) in Wisbech. There are two AQMAs within Kings Lynn, where the level of nitrogen dioxide (NO2) has exceeded the National Air Quality Strategy annual mean of 40 µg/m3. The study area for the EIA is detailed within section 7.3 of the scoping report. This states that, in line with the Environment Agency's Air emissions risk assessment for your environmental permit guidance, the study area will include an area encompassing 15km from the location of the chimney emissions and up to 350m from the boundary of any construction activity (including grid connection) in accordance with the IAQM's Guidance on the assessment of dust from demolition and construction.

As the King's Lynn AQMAs are outside the study area, and the relevant roads included within the AQMAs have not been identified as receptors for the proposed development, they have not been included in the assessment of impacts. This we agree with. However, we require an explanation of why they have not been included within the Scoping Report.

Furthermore, we welcome the Inspectorate's comments regarding the impact of construction on air quality and the uncertainty relating to this, and the satisfactory nature of the operational odour management plan proposed within the Scoping Report.

Section 7.5 and Figure 7.1 of the scoping report detail the receptors which could be significantly affected by the proposed development. We note that land and farm workers have not been identified as potential receptors for the proposed development, and that the receptor locations need to be agreed. We suggest a Human Health Risk Assessment (HHRA) is carried out to assess the potential impact of the proposed development on these additional receptors.

Chapter 8 – Landscape and visual

A large scale solar farm, Rose and Crown Solar Farm, is within the grid connection corridor and is in close proximity to identified Listed Buildings . The identified viewpoints are scant within the grid connection corridor and 3km Study Area within West Norfolk. It is suggested, in accordance with Norfolk County Council's comments, that further viewpoints

are required to assess the impact of both the main building and grid connection infrastructure.

Chapter 10 – Biodiversity

Please note Policy DM19 of the SADMPP 2016 relating to Green Infrastructure/Habitats Monitoring and Mitigation.

Chapter 11 - Hydrology

The Borough Council has an adopted SFRA Level 1 and 2 available: https://www.west-norfolk.gov.uk/info/20173/information_for_planning_agents/391/flood_risk_assessment which is not cited within Table 11.1. All sources of flooding should be considered in accordance with the adopted SFRA, NPPF and relevant NPPG.

Chapter 13 - Climate Change

With regard to Climate Change, we agree with the general approach outlined within the Scoping Report. However we anticipate recovery status will be brought up during the planning process; will the applicant be addressing this? Additionally we welcome the Inspectorate's comment that the ES should assess the potential impact of waste transportation on climate change.

Chapter 12 - Contaminated Land

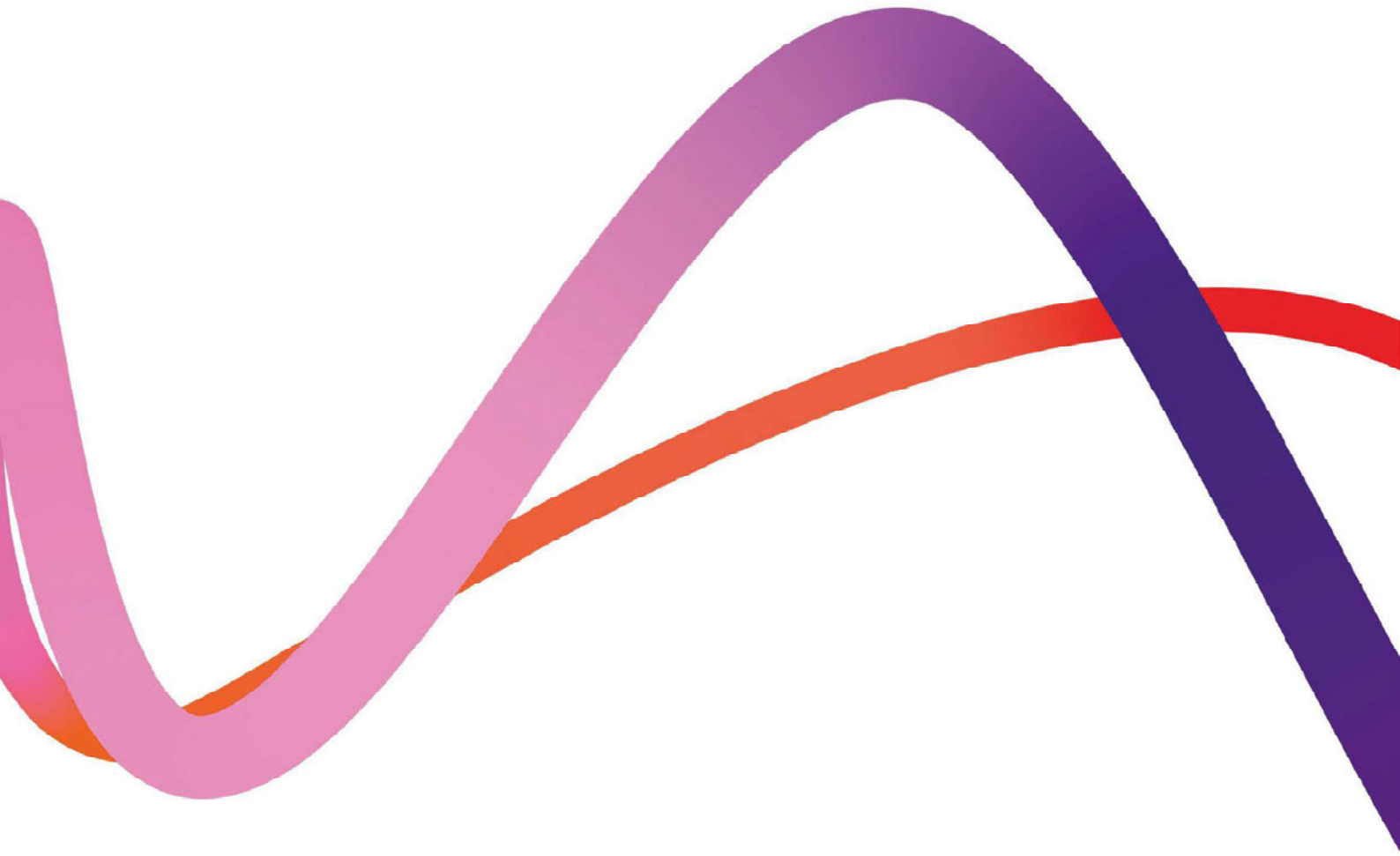
Chapter 12 of the Scoping Report describes a review of documentary baseline information on ground conditions and refers to relevant policy and guidance. The review describes the site's previous uses and highlights the presence of fuel storage and made ground currently on site. A description of geology, hydrogeology and hydrology are provided. It is noted that it is proposed to confirm the desk study findings through review of additional data sources, site investigation (where required) and consultation with the relevant stakeholders. A number of sensitive receptors are identified in the scoping report and we consider that a reasonable methodology is proposed to manage any potential risks.

I trust the aforementioned information and will be taken into account by the Applicant.

Yours sincerely

[redacted]

Stuart Ashworth
Assistant Director – Environment & Planning



Medworth Energy from Waste
Combined Heat and Power Facility

PINS ref. EN010110
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Environmental Statement Chapter 1 Introduction Appendix 1F: Terms and Abbreviations

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

We inspire with energy.

Appendix 1F
Terms and Abbreviations

The following terms (**Table A1**) and abbreviations (**Table A2**) have been adopted within the Environmental Statement.

Table A1 Terms

Term	Definition
ABC Method	Method provided in BS 5228-1:2009+A1:2014 Code of practice for noise and vibration control on construction and open sites – Part 1: Noise for determining thresholds of potential significance for construction noise affecting residential premises.
Abstraction	The process of taking water from a surface or groundwater source.
Access Improvements	The works that will be carried out to improve access along New Bridge Lane to the EfW CHP Facility and to include for the reopening of the highway over the disused March to Wisbech Railway. Also, to include a relocated access from Algores Way.
Adaptation	The process of adjustment in a design or operational procedure to respond to the projected impacts of climate change, in order to moderate harm or exploit beneficial opportunities.
Algores Way Access Improvements	The Access Improvements along Algores Way.
Alternatives	Different location, design, layout and technological possibilities considered.
Ambient sound	Totally encompassing sound in a given situation, at a given time, usually composed of sound from many sources near and far.
APFP Regulations	The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009, setting out the requirements for the Development Consent Order Application submission.
Applicant	The party applying for the Medworth Energy from Waste Combined Heat and Power Facility Development Consent Order, in this case Medworth CHP Ltd, a wholly owned subsidiary of MVV Environment Ltd.
Aquatic Environment	The ecosystem within a waterbody; including surface waters, groundwaters and marine waterbodies.
Aquifer	A layer of underground rock that contains and transmits water.
Assessment	A process by which information about effects of a proposed plan, programme or project are evaluated.

Term	Definition
Best and Most Versatile (BMV)	Best and Most Versatile (BMV) land is defined as Agricultural Land Classification Grades 1, 2 and 3a, and is the land which is most flexible, productive and efficient in response to inputs and which can best deliver future crops for food and non-food uses such as biomass, fibres and pharmaceuticals.
Biodiversity Net Gain (BNG)	An approach to development which aims to leave the natural environment in a measurably better state than beforehand.
Birds Directive	Council Directive 2009/147/EC on the conservation of wild birds.
Bronze Age	The years 2,600 to 700 BC.
Building Research Establishment Environmental Assessment Method (BREEAM)	A sustainability assessment method that is used to masterplan projects, infrastructure and buildings.
Carbon	'Carbon' is used as shorthand to refer to the basket of six greenhouse gases (GHGs) recognised by the Kyoto Protocol. GHGs are converted to carbon dioxide equivalents (CO_{2e}) based on their global warming potential per unit as compared to one unit of CO_2.
Carbon Dioxide Equivalent (CO_{2e})	Carbon dioxide equivalent (CO_{2e}) is a term for describing different GHGs in a common unit. For any quantity and type of GHGs, CO_{2e} represents the amount of carbon dioxide (CO_2) which would have the equivalent global warming impact.
Characterisation	The process of identifying areas of similar character, classifying and mapping them and describing their character.
CHP Connection	The CHP connection from the EfW CHP Facility including the Steam Pipeline and any Private Wire Connections located within the CHP Connection Corridor.
CHP Connection Corridor	The corridor of land including the disused March to Wisbech Railway and land into the surrounding industrial estate through which the CHP Connection would be located.
Climate	Climate is usually defined as the average weather over a period of time ranging from months to thousands or millions of years. The classical period for averaging these variables is 30-years, as defined by the World Meteorological Organization. Weather factors often considered in climate are surface variables such as temperature, precipitation and wind.
Climate Change	The United Framework Convention on Climate Change (UNFCCC), in its Article 1, defines climate change as: *'a change of climate which is attributed directly or indirectly to human activity that alters the composition of the global atmosphere and which is in addition to natural climate variability observed over comparable time periods'*. While climate change can be attributable to natural causes, the UNFCCC distinguishes climate change as related to human activities altering the atmospheric composition and climate variability.
Climate Change Impact	An impact from a climate hazard which affects the ability of the Receptor or asset to maintain its function or purpose.

Term	Definition
Climate Change Resilience	'Climate change resilience' of the Proposed Development is its ability to absorb the impacts of climate change and maintain its functionality. This can be increased through the introduction of adaptation measures, which are referred to as 'embedded measures'.
Climate Hazard	A physical process or event (hydro-meteorological or oceanographic variables or phenomena) that can harm human health, livelihoods, or natural resources.
Combined Heat and Power (CHP)	A technology that puts to use the residual heat of the combustion process after generation of electricity that would otherwise be lost to the environment.
Committee of Toxicity of Chemicals in Food, Consumer Products and the Environment (COT)	An independent scientific committee that provides advice to the Food Standards Agency, the Department of Health and Social Care, and other Government Departments and Agencies on matters concerning the toxicity of chemicals.
Committee on the Medical Effects of Air Pollutants (COMEAP)	An independent scientific committee that provides advice to government departments and agencies on how air pollution impacts on health.
Community Contact Point (CCP)	A 24-hour dedicated telephone line and answerphone service provided by the Applicant for queries relating to the project and consultation.
Condensate Pipeline	The pipeline that transports condensate from customer(s) back to the EfW CHP Facility, forming part of the CHP Connection.
Consequence (climate change)	Any effect on the Receptor or asset as a result of the climate hazard having an impact.
Construction Environmental Management Plan (CEMP)	A document prepared by the Applicant setting out the responsibilities and environmental standards required by the Principal Contractor(s) (and any sub-contractors) to adopt for the construction of the Proposed Development.
Contaminant	A substance that is undesirable or an unnaturally high concentration of a substance.
Control of Major Accident Hazards Regulations 2015 (COMAH)	The regulations, currently in force in the UK, that apply to establishments storing and handling large quantities of industrial chemicals of a hazardous nature.
Culvert	A covered watercourse channel or pipe, which conveys flows under a potential obstruction.
Day time	The period 07:00-23:00 hours.
dBA	A-weighted decibel. A-weighting is a correction factor to represent how the human ear responds to sound, which is internationally accepted and found to correspond well with people's subjective reaction to sound.
Designated Landscape	Areas of landscape identified as being of importance at international, national or local levels, either defined by statute or identified in development plans or other documents.

Term	Definition
Designated Site	A site designated for the purposes of nature conservation, either statutorily or non-statutorily, at an international, European, national (UK) or local level.
Development Consent Order (DCO)	The form of development consent granted by the Secretary of State pursuant to the 2008 Act to authorise a Nationally Significant Infrastructure Project. A DCO can incorporate or remove the need for a range of consents which would otherwise be required for such a development. A DCO can also include rights of compulsory acquisition.
Development Consent Order (DCO) Requirement	A clause in the DCO which secures the mitigation relied on within the Environmental Statement.
Disaster	A natural occurrence leading to serious damage to Receptors.
Discharge	Release of water/water vapor to a watercourse/air.
Distribution Network Operator (DNO)	A company licensed to distribute *electricity* in the UK as part of the National Electricity Transmission Network.
Document Inspection Locations	Unstaffed venues, such as libraries and community centres, where hard copies of consultation documents were available to view and inspect free of charge during the consultation periods.
Early Medieval	The years 410 to 1,066 AD.
Ecological Feature	A defined environmental feature usually associated with population, fauna and flora with the potential to be affected by a project.
Ecotone	A region of transition between two biological communities.
EfW CHP Facility	The facility to which residual waste is delivered to be treated by means of controlled incineration to produce energy.
EfW CHP Facility Site	The land upon which the EfW CHP Facility would be located.
EIA Regulations	The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (as amended).
EIA Scoping	The process of identifying the issues to be addressed by the environmental impact assessment process. It is a method of ensuring that an assessment focuses on the important issues and avoids those that are considered to be not significant.
EIA Scoping Opinion	The EIA Scoping opinion dated January 2020 received from the Secretary of State on the information contained with the Scoping Report.
EIA Scoping Report	The EIA Scoping Report dated December 2019 submitted by the Applicant to the Secretary of State setting out the proposed scope of the EIA.
Embodied Carbon	The embodied carbon describes the carbon footprint of a material, allowing for the sum of the energy required in resource extraction, and any processing required, as well as the transport and supply logistics to the factory gate (prior to transport to the Proposed Development for use), to be accounted for within the overall GHG estimation.

Term	Definition
Emission Factor	The GHG emissions factors relate to a given level of activity, or amount of fuel, energy or materials used, to the mass of GHGs released as a consequence. It is measured in the amount of GHG emissions (in gCO_{2e}, tCO_{2e}, $ktCO_{2e}$, $MtCO_{2}e$, etc.) relative to the activity unit (e.g., tonnes, km, kgs etc.).
Environmental Impact Assessment (EIA)	A statutory process by which certain planned projects must be assessed before a formal decision to proceed can be made. It involves the collection and consideration of environmental information, which fulfils the assessment requirements of the EIA Regulations, including the publication of an Environmental Statement.
Environmental Permit (EP)	A permit, granted by the Environment Agency under the Environmental Permitting Regulations 2016, that the Applicant intends to apply for in order to operate the Proposed Development.
Environmental Statement (ES)	A document produced in accordance the EIA Regulations in which the process and results of an EIA are documented.
EPC Contractor	The construction contractor(s) to be selected by the Applicant to build the Proposed Development.
European Protected Species (EPS)	European Protected Species are species of plants and animals (other than birds) protected by law.
European Site	European sites are those that are designated through the Habitats Directive and Birds Directive (via national legislation as appropriate). Within England additional sites designated through international convention are given the same protection through policy – overall all of these are referred to as European sites. European sites in England are considered to be SPAs, SACs, candidate SACs and Sites of Community Importance (SCI). Potential SPAs (pSPA), possible SACs (pSACs), Ramsar sites (designated under international convention) and proposed Ramsar sites.
Expert Panel on Air Quality Standards (EPAQS)	Now merged into COMEAP, this was an independent scientific committee that provided advice to government on air quality issues, in particular regarding the level of pollution at which no or minimal health effects are likely to occur.
Extreme Weather Event	A weather event that is as rare as or rarer than the 10th or 90th percentile of a probability density function estimated from observations for a specific place and time of year. By definition, the characteristics of what is called extreme weather may vary from place to place in an absolute sense.
Favourable Conservation Status (FCS)	Describes the situation in which a habitat or species is thriving throughout its natural range and is expected to continue to thrive in future.
Flood Risk Assessment (FRA)	A method and a process by which information on flood risk is collected, assessed, and used to inform decision-making.
Free Field	Signifies that a sound measurement has been undertaken in 'free field' conditions i.e., away from any reflecting facades, other than the ground, e.g., building facades, close boarded fence work etc.

Term	Definition
Future Environmental Requirement Area	Reserved land for future environmental requirements in response to future policy changes.
Greenhouse Gas (GHG) Emissions	GHG emissions are determined by the Kyoto Protocol (1997) to include six gases: carbon dioxide, methane, nitrous oxide, F-gases (hydrofluorocarbons and perfluorocarbons), sulphur hexafluoride and nitrogen trifluoride. To provide consistent reporting of these gases, each is weighted by its global warming potential and converted to a carbon dioxide equivalent (CO2e).
Greenhouse Gas (GHG) Intensity	Measures the GHG emissions of different types of electricity generation relative to the intensity of the electricity generation. It is measured in emissions of CO_{2e} or CO_2 (e.g., gCO_{2e}, tCO_2 etc.), relative to an energy unit e.g., kWh, GWh, etc.
Grid Connection	The underground electrical connection to the National Electricity Transmission Network from the EfW CHP Facility via the Distribution Network Operator's system located within the Grid Connection Corridor and including the Applicant's Walsoken Substation.
Grid Connection Corridor	The corridor of land through which the Grid Connection would be located.
Grid Connection Route Option 1	The Grid Connection Route option via the existing highway alignment off the A47 and along Broadend Road.
Grid Connection Route Option 2	The Grid Connection Route option off the A47 via the historical highway alignment along Broadend Road.
Grid Connection Routes	The routes considered for the Grid Connection between the PEIR and the submission of the DCO application.
Grid Connection Search Corridor	The areas of search to connect the EfW CHP Facility to the National Electricity Transmission Network.
Habitat of Principal Importance	Habitats of Principal Importance for conservation of biodiversity in England, listed by the Secretary of State pursuant to the requirements of Section 41 of the Natural Environment and Rural Communities Act 2006.
Habitat Regulations	The Habitats Directive and the Birds Directive were transposed in England by the Conservation of Habitats and Species Regulations 2017 (as retained by the European Union (Withdrawal) Act 2018 and the European Union (Withdrawal Agreement) Act 2020 and amended by the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019). The Habitats Regulations apply to land in England and Wales and territorial waters and act to ensure biodiversity of natural habitats and of wild flora and fauna through a range of measures including designation of SACs.
Habitat Regulations Assessment (HRA)	The assessment of the likely significant effects of implementing a plan or policy on a European Site, the purpose being to consider the impacts of a project against conservation objectives of the site and to ascertain whether it would adversely affect the integrity of the site.
Habitats Directive	Council Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora.

Term	Definition
Hazard and Operability Analysis (HAZOP)	A systematic approach to determining potential problems that may be uncovered by reviewing the safety of designs and revisiting existing processes and operations.
Heatwave	A heatwave is an extended period of hot weather relative to the expected conditions of the area at that time of year, which may be accompanied by high humidity. A UK heatwave threshold is met when a location records a period of at least three consecutive days with daily maximum temperatures meeting or exceeding the heatwave temperature threshold.
Heritage Significance	The significance of a heritage asset is the product of the value it holds for this and future generations as a result of its historic, archaeological, architectural, or artistic interests.
Holford Rules	Guidelines for the routeing of new high voltage overhead transmission lines.
Host Authorities	The Local Authorities (but not including parish or town councils) who fall within the Order limits for the Proposed Development including: Fenland District Council, Borough Council of Kings Lynn and West Norfolk, Cambridgeshire County Council and Norfolk County Council.
Hydrotreated Vegetable Oil (HVO)	A biofuel made by the hydrocracking or hydrogenation of vegetable oil.
In-combination Climate Change Impact (ICCI)	Results when a climate change impact increases or decreases the effect of the Proposed Development on an environmental Receptor. For example, the biodiversity aspect may identify an effect on an environmental Receptor (such as severance of semi-natural woodland) arising from the Proposed Development. In addition, the climate hazard (for example, drought) will lead to a climate change impact (for example, reduced vegetation growth). The ICCI is the exacerbation of the original effect identified by the environmental aspect. Any environmental measure in place to reduce the effect of the severance would therefore need to also consider the future climate conditions.
Independent Connection Provider	An accredited company that carries out works on the electricity network, on behalf of clients.
Independent Distribution Network Operator	An accredited company licensed by Ofgem to distribute electricity in the UK as part of the National Electricity Transmission Network.
Indirect Landscape Effects	Effects that result indirectly from the Proposed Development as a consequence of the direct effects, often occurring away from the site, or as a result of a sequence of interrelationships or a complex pathway. They may be separated by distance or in time from the source of the effects.
Infiltration	Permeation of water into the soil or rock.
Internal Drainage Board (IDB)	An operating authority, established in areas requiring special drainage, that carries out water level management within the administrative district boundaries.
Iron Age	The years 800 BC to 43 AD.

Term	Definition
$L_{Aeq, T}$	The equivalent continuous sound level. The sound level of a steady sound having the same energy as a fluctuating sound over the same period. Ambient and residual sound levels are described with this index. $L_{Aeq, T}$ is considered the best general-purpose index for environmental sound, as it is the index which generally best represents how sound levels are perceived.
L_{Amax}	The maximum recorded sound level during the measurement period.
$L_{An, T}$	This noise index represents the sound level exceeded for n% of the measurement period. The $L_{A90,T}$ is used to indicate quieter times during the measurement period. In BS 4142 assessments it is usually referred to as the background sound level and describes the quietest 10% of a measurement period.
Landscape	An area, as perceived by people, the character of which is the result of the action and interaction of natural and/or human factors (as defined by the European Landscape Convention).
Landscape (or Townscape) Character Areas	Single unique areas which are the discrete geographical areas of a particular landscape type.
Landscape Character	A distinct, recognisable, and consistent pattern of elements in the landscape that makes one landscape different from another, rather than better or worse.
Landscape Character Types	Distinct types of landscape that are relatively homogeneous in character. They are generic in nature, in that they may occur in different areas in different parts of the country, but wherever they occur they have distinct, recognisable and consistent pattern of elements in the landscape.
Landscape Characteristics	Elements or combination of elements which make a contribution to distinctive landscape character.
Landscape Condition	A measure of the physical state of the landscape.
Landscape Effects	Effects on the landscape as a resource in its own right. Considers how the proposal will affect the elements that make up the landscape, the aesthetic and perceptual aspects of the landscape and its distinctive character.
Landscape Elements	Individual parts which make up the landscape, such as, for example, trees, hedges, and buildings.
Landscape Key Characteristics	Those combinations of elements which are particularly important to the current character of the landscape and help to give an area its particularly distinct sense of place.
Landscape Value	The relative value that is attached to different landscapes by society. A landscape may be valued by different stakeholders for a whole variety of reasons.
Likelihood	The likelihood of an impact occurring during the phase of the development.

Term	Definition
Listed Building	A building or structure of special historical or architectural/artistic interest and so designated by the Department for Digital, Culture, Media and Sport. (Note, all buildings built before 1700 which survive in anything like their original condition are likely to be listed, as are most buildings built between 1700 and 1850).
Lowest Observed Adverse Effect Level (LOAEL)	This is the noise level above which adverse effects on health and quality of life can be detected.
M&E	(Installation of) Mechanical and electrical systems and equipment.
Main River	A designated statutory watercourse, usually larger streams and rivers and shown on the Main River map.
Major Accident	An occurrence resulting from an uncontrolled event caused by a man-made activity or asset leading to serious damage to Receptors.
March to Wisbech Railway	The disused railway between the towns of March and Wisbech.
Medieval	The years 1,066 to 1540 AD.
Mesolithic	The years 10,000 to 4,000 BC.
MVV	Refers to MVV Environment Limited, the parent company of the Applicant, and/or any other MVV companies within the MVV Energie AG group.
National Electricity Transmission Network	The high voltage electricity transmission network for England, Scotland and Wales.
National Grid	National Grid Electricity Transmission plc, the company which owns the National Electricity Transmission Network.
National Planning Policy for Waste (NPPW)	The document which sets out detailed waste planning policies and which should be read in conjunction with the National Planning Policy Framework.
National Planning Policy Framework (NPPF)	The document which sets out the government's planning policies for England.
National Policy Statement EN-1	National Policy Statement - Overarching NPS for Energy.
National Policy Statement EN-3	National Policy Statement - Renewable Energy Infrastructure.
National Policy Statement EN-5	National Policy Statement - Electricity Networks Infrastructure.
National Policy Statements (NPS)	Documents which set out the primary policy considerations for Nationally Significant Infrastructure Projects.
Nationally Significant Infrastructure Project (NSIP)	Large energy and infrastructure projects, including railways, large wind farms, power stations, reservoirs, harbours, airports and sewage treatment works, as defined in the Planning Act 2008.
Neolithic	The years 4,000 to 2,200 BC.

Term	Definition
Net Zero GHG emissions	Reduction in net GHG emissions by at least 100% below 1990 levels by 2050 (the 'UK carbon target', often referred to as 'net zero').
New Bridge Lane Access Improvements	The Access Improvements along New Bridge Lane.
Night-time	The period 23:00-07:00 hours.
No Observed Effect Level (NOEL)	This is the level below which no effect can be detected. In simple terms, below this level, there is no detectable effect on health and quality of life due to the noise.
Noise Indices	Noise levels usually fluctuate over time, so it is often necessary to consider an average or statistical noise level. This can be done in several ways, so a number of different noise indices have been defined, according to how the averaging or statistics are carried out.
Non-contestable works	Works that are identified by a District Network Operator (DNO) in its connection charging methodology and statement that may only be carried out by the DNO (and 'Non-Contestable' will be interpreted accordingly).
Non-statutory consultation	Consultation with Stakeholders undertaken before the statutory consultation phase.
Oblique Views	A view which is not seen or experienced in a direct way or angle; for example, a view which is at a different angle to the main direction of the viewer's travel and therefore requires the head to be turned to perceive the view, and is not the main focus for that person.
Open Views	A view with no restrictions, not closed or blocked or framed.
Order Limits	The limits of the extent of the Proposed Development defined by the Development Consent Order.
Ordinary Watercourse	A minor watercourse that does not form part of a Main River.
Palaeolithic	The years 1,000,000 to 10,000 BC.
Perception	Combines the sensory (that we receive through our senses) with the cognitive (our knowledge and understanding gained from many sources and experiences).
Perceptual characteristics or qualities	Perceptual or experiential attributes, such as a sense of naturalness, remoteness, or tranquillity.
Perched Groundwater	Groundwater disconnected from the underlying groundwater body by an unsaturated zone.
Photowire	A 3D wireline model of the development correctly placed in its photographic context.
Post Medieval	The years 1,540 to 1,901 AD.
Potential Mitigation Area	An area of land reserved for potential environmental mitigation subject to the outcomes of the environmental assessment.

Term	Definition
Preferred Option	The chosen design option that most successfully achieves the Proposed Development's objectives and becomes subject to further design and assessment.
Preliminary Environmental Information Report (PEIR)	A document prepared by the Applicant in accordance with the EIA Regulations for pre-application consultation which includes sufficient information to enable consultees to develop an informed view of the project.
Private Wire Connections	One or more cables that transmit electricity generated by the EfW CHP Facility to customers forming part of the CHP Connection.
Proposed Development	The whole of the development comprising the EfW CHP Facility, CHP Connection, Grid Connection, Water Connections, Access Improvements and Temporary Construction Compound and any other associated development included in Schedule 1 to the DCO.
Ramsar	Ramsar sites are designated under the International Convention on Wetlands of International Importance especially as Waterfowl Habitat (the Ramsar Convention)
Rating Noise Level	The specific noise source plus any adjustment for the characteristic features of the noise, denoted by LAr,T.
RCP8.5	High/worst-case emissions scenario. This scenario uses a Representative Concentration Pathway defined by the Intergovernmental Panel on Climate Change's latest 5th Assessment Report. Representative Concentration Pathway 8.5 specifies the concentration of GHGs that would result in 8.5 W/m^2 radiative forcing at the top of the atmosphere by 2100, relative to pre-industrial levels. The increase of global mean surface temperature by the end of the 21st century (2081–2100) relative to 1986–2005 is likely to be 2.6°C to 4.8°C under RCP8.5.
Receptor	A defined environmental feature, usually associated with population, fauna and flora, with the potential to be affected by a project.
Registered Park and Garden	Those on the register of historic parks, gardens, grounds, and planned open spaces maintained and designated by Historic England.
Representative Concentration Pathway (RCP)	Future pathways based on emissions and concentrations of Greenhouse Gases. Each RCP provides only one of many possible scenarios that could lead to specific forcing mechanisms (an energy imbalance enforced on the climate system either externally or by human forces).
Residential Visual Amenity	The overall quality, experience and nature of views and outlook available to occupants of residential properties, including views from gardens and domestic curtilage.
Residential Visual Amenity Assessment	Undertaken to provide an informed answer as to whether the effect of a Proposed Development on residential visual amenity would be of such a nature and/or magnitude that it potentially affects living conditions.

Term	Definition
Rochdale Envelope	The Rochdale cases provide the basis upon which a project can be described by a series of maximum extents. This allows the detailed design of the Project to vary within this 'envelope' without invalidating the corresponding EIA.
Roddon	The dried raised, silt and clay-filled bed of a watercourse such as a river or tidal-creek, especially in The Fens in eastern England.
Romano-British	The years 43 to 410 AD.
Scheduled Monument	Nationally important archaeological sites, designated by the Department for Digital, Culture, Media and Sport. These can be above or below-ground and do not need to be ancient.
Setting (heritage)	The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate an asset, or may be neutral.
Significant Observed Adverse Effect Level (SOAEL)	This is the level above which significant adverse effects on health and quality of life occur.
Site of Special Scientific Interest (SSSI)	Sites designated at the national level under the Wildlife & Countryside Act 1981 (as amended). They are a series of sites that are designated to protect the best examples of significant natural habitats and populations of species.
Sound (/noise)	Sound encompasses all audible sounds. Noise generally refers to unwanted sound. These terms are used interchangeably in British Standards relating to sound and noise. For example, ambient sound levels may be referred to as ambient noise levels.
Sound Pressure	Sound, or sound pressure, is a fluctuation in air pressure over the static ambient pressure.
Sound Pressure Level, Lp	The sound pressure level, Lp is the sound pressure relative to a standard reference pressure of 20 mPa (20x10-6 Pascals) on a decibel scale. Pascal is a unit of pressure used to quantify internal pressure.
Southern Access Road	A transport scheme forming part of the Wisbech Access Strategy. Includes Options 1 and 2.
Special Area of Conservation (SAC)	International designation implemented under the Habitats Regulations for the protection of habitats and (non-bird) species. Sites designated to protect habitats and species on Annexes I and II of the Habitats Directive. Sufficient habitat to maintain Favourable Conservation Status of the particular feature in England needs to be identified and designated.
Special Protection Area (SPA)	Sites designated to protect habitats of migratory birds and certain threatened birds under the Birds Directive.
Species of Principal Importance	Species of Principal Importance for conservation of biodiversity in England, listed by the Secretary of State pursuant to the requirements of Section 41 of the Natural Environment and Rural Communities Act 2006.

Term	Definition
Specific Noise Level	The noise source under investigation for assessing the likelihood of complaints, measured as and LAeq,T.
Stakeholder	An organisation or individual with a particular interest in, or potential to be affected by, the Proposed Development.
Statutory Consultation	Consultation pursuant to section 42, section 46, section 47 and section 48 of the Planning Act 2008
Statutory Consultee	Organisations that the Applicant and/or the competent authority (the Secretary of State) is required to consult, by virtue of the EIA Regulations and the Infrastructure Planning (Applications: Prescribed Forms and Procedure)) Regulations 2009 (as amended).
Steam Pipeline	The pipeline that transports steam generated by the EfW CHP Facility to customer(s), forming part of the CHP Connection.
Study Area	The geographical area under consideration. The Study Area can be specific to the individual environmental disciplines.
Susceptibility	The ability of a defined landscape or visual Receptor to accommodate the specific Proposed Development without undue negative consequences.
Temporary Construction Compound (TCC)	The Temporary Construction Compound required to construct the Proposed Development.
Tidal Limit	Defined as the point farthest upstream on a river, which is influenced by tidal fluctuations.
Time Depth	Historical layering – the idea of landscape as a 'palimpsest', a much written-over asset of landscape.
Townscape	The character and composition of the built environment including the buildings and the urban spaces.
Tranquillity	A state of calm and quietude associated with peace, considered to be a significant asset of the landscape.
Trefoil [of cables]	3 cables laid together to comprise a single 3-phase circuit.
Trend in climate variable/climate change trend	A weather or climate related event which has potential to do harm to environmental Receptors or assets. The trend could be acute, for example, increase in frequency of heavy rainfall events or chronic events, such as the increased mean winter precipitation.
Trip End Model Presentation Program (TEMPro)	A software package that enables access to National Trip End Model datasets for the detailed analysis of pre-processed trip-end, journey mileage, car ownership and population/workforce planning data.
UK Carbon Budget	The UK Carbon budgets were introduced under the Climate Change Act (2008). Each carbon budget provides a five-year, statutory cap on total GHGs, in order to meet the UK's emission reduction commitments. So far, six carbon budgets have been set in law, covering the period from 2008 to 2037. These limit UK GHG emissions from all sources, excluding international aviation and shipping.

Term	Definition
UK Power Networks (UKPN)	The District Network Operator responsible for the regional electrical transmission network in the region of the Proposed Development.
UKCP18	UK Climate Change Projections 2018. UK Climate Projections 2018 is the most up-to-date assessment of how the climate of the UK may change over the 21st century, recently updated in 2018. UK Climate Projections 2018 uses climate science to provide observations and climate change projections for the UK and globally until 2100.
Viewpoints	Selected for illustration of the visual effects and falling broadly into three groups: Representative Viewpoints - selected to represent the experience of different types of visual Receptor, where larger numbers of viewpoints cannot all be included individually and where the significant effects are unlikely to differ, for example, certain points may be chosen to represent the view of users of particular public footpaths and bridleways; Specific Viewpoints - chosen because they are key and sometimes promoted viewpoints within the landscape, including, for example, specific local visitor attractions, such as landscapes with statutory landscape designations or viewpoints with particular cultural landscape associations; and Illustrative Viewpoints - chosen specifically to demonstrate a particular effect or specific issues, which might, for example, be the restricted visibility at certain locations.
Visual Amenity	The overall pleasantness of the views people enjoy of their surroundings, which provide an attractive visual setting or backdrop for the enjoyment of activities of the people living, working, recreating, visiting or travelling through an area.
Visual Effects	Effects on specific views and on the general visual amenity experienced by people.
Visualisation	Computer simulation, photomontage, or other technique to illustrate the predicted appearance of a development.
Vulnerability	The propensity or predisposition of a system or Receptor to be adversely affected. This encompasses the sensitivity of the system or Receptor and its capacity to cope and adapt.
Walking Floor	The hydraulically controlled floor system (walking floor or moving floor) moves the load outwards while the driver controls the operation from a safe distance.
Walsoken District Network Operator (DNO) Substation	The DNOs existing substation located off Broadend Road.
Walsoken Substation	The Applicant's substation required for the Grid Connection.
Waste Fuel Availability Assessment (WFAA)	A document prepared by the Applicant demonstrating how the Proposed Development conforms to the waste hierarchy and relevant waste plans and strategies.
Waste Transfer Station (WTS)	A site where waste is taken once it has been collected. While at the station, waste may be stored, sorted and/or separated before being transported on to another area or facility.

Term	Definition
Water Connections	Proposed foul water connection from a point north of the Algores Way EfW CHP Facility access and a proposed potable water supply from an existing water main east of the A47 to run along an existing orchard/field and New Bridge Lane prior to entering the EfW CHP Facility. Both connections to be provided by the Applicant and/or Anglian Water.
Water Resources	Natural water that is (potentially) useful.
Weather	Short term variations in the state of the atmosphere at a particular place and time in regard to temperature, cloudiness, humidity, sunshine, winds, precipitation, etc.
Wireline	A computer-generated visualisation, generally without a photographic context.
Wisbech Access Strategy (WAS)	A package of individual transport schemes that aim to improve the transport network in the area
Z Ratio	The ratio of reduction in power export for a given increase in heat export.
Zone of Influence (ZOI)	The geographical area over which there is the potential for one project to be affected by another. The extent of the Zone of Influence will differ depending upon the environmental topic.
Zone of Theoretical Visibility (ZTV)	A map, usually digitally produced, showing areas of land within which, a development is theoretically visible.

Table A2 Abbreviations

Abbreviation	Definition
°C	Degrees centigrade
µg/m3	Microgram per cubic metre
2008 Act	The Planning Act 2008 (as amended)
AADF	Annual Average Daily Flow
AADT	Annual Average Daily Traffic
AC	Activated Carbon
ADD	Average Daily Dose
AEP	Annual Exceedance Probability
AGI	Above Ground Installation
AIL	Abnormal Indivisible Loads
ALARP	As Low As Reasonably Practical
ALC	Agricultural Land Classification
AOD	Above Ordinance Datum
APCr	Air Pollution Control residues
AQAL	Air Quality Assessment Levels
AQMA	Air Quality Management Area
AQO	Air Quality Objectives
AQS	Air Quality Standards
ASR	Annual Status Report
BAT	Best Available Techniques
BAT-AEL	Best Available Technique Associated Emission Levels
BEIS	(Department for) Business, Energy and Industrial Strategy
BGS	British Geological Survey
BMV	Best and Most Versatile
BNG	Biodiversity Net Gain
BPM	Best Practicable Means
BS	British Standard
BSI	British Standards Institution

Abbreviation	Definition
BSI PDs	British Standards Institution Published Documents
CAR-SOIL	Control of Asbestos Regulations 2012, Interpretation for Managing and Working with Asbestos in Soil and Construction and Demolition Materials (CL:AIRE, 2016)
CBRN	Chemical, Biological, Radiological, Nuclear
CCC	Cambridgeshire County Council
CCP	Community Contact Point
CCR	Climate change resilience
CCS	Carbon capture and storage
CDM	Construction Design and Management
CDM	Construction (Design and Management) Regulations 2015
CEMP	Construction Environmental Management Plan
CEMS	Continuous Emissions Monitoring Systems
CFR	Consultation Feedback Report
CHP	Combined Heat and Power
CIRIA	Construction Industry Research and Information Association
CL:AIRE	Contaminated Land: Applications in Real Environments
CLR11	Contaminated Land Report 11 (CLR11) Model Procedures for the Management of Land Contamination (Environment Agency, 2004)
CM	Carbon Monoxide
CNI	Critical National Infrastructure
CNVMP	Construction Noise and Vibration Management Plan
CO	Carbon monoxide
COMAH	Control of Major Accident Hazards
CoNAW	Control of Noise at Work Regulations 2005
COP26	The 26th Conference of the Parties (COP) to the United Nations Framework Convention on Climate Change
CoPA	Control of Pollution Act, 1974
COPC	Compounds of Potential Concern
COPD	Chronic Obstructive Pulmonary Disease
CPCA	Cambridgeshire and Peterborough Combined Authority

Abbreviation	Definition
CPNI	Centre for the Protection of National Infrastructure
CPRE	Campaign to Protect Rural England
CTMP	Construction Traffic Management Plan
CWS	County Wildlife Site
dB	Decibel
DCLG	Department for Communities and Local Government
DCO	Development Consent Order
DDA	Disability Discrimination Act 1995
DEMP	Decommissioning Environmental Management Plan
Defra	Department for Environment, Food and Rural Affairs
DfT	Department for Transport
DMP	Drainage Management Plan
DMRB	Design Manual for Roads and Bridges
DNO	District Network Operator
DoWCoP	Definition of Waste Code of Practice (CL;AIRE, 2011)
DPF	Diesel Particulate Filters
DSEAR	Dangerous Substances and Explosive Atmosphere Regulations
DWFAA	Draft Waste Fuel Availability Assessment
EA	Environment Agency
EALs	Environmental Assessment Levels
EfW	Energy from Waste
EHO	Environmental Health Officer
ELV(s)	Emission Limit Value(s)
EMF	Electric and Magnetic Fields
EN-1	Overarching National Policy Statement for Energy
EN-3	National Policy Statement for Renewable Energy Infrastructure
EN-5	National Policy Statement for Electricity Networks Infrastructure
EP	Environmental Permit
EPA	Environmental Protection Act, 1990

Abbreviation	Definition
EPR	Environmental Permitting Regulations 2016 (as amended)
EPS	European Protected Species
EPUK	Environmental Protection UK
ES	Environmental Statement
EU	European Union
FAO	Food and Agriculture Organization
FDC	Fenland District Council
FFP	Fire Prevention Plan
FGT	Flue Gas Treatment
FRA	Flood Risk Assessment
FWMA	Flood and Water Management Act
GDPR	General Data Protection Regulation
GEART	Guidelines for the Environmental Assessment of Road Traffic
GHG	Greenhouse gases
GLVIA3	Guidelines for Landscape and Visual Impact Assessment (third edition)
GPP	Guidance for Pollution Prevention
GPS	Global Positioning System
GRP	Glass Reinforced Polymer
GWDTE	Groundwater Dependent Terrestrial Ecosystems
GWMU	Groundwater Management Unit
Ha	Hectare
HAZOP	Hazard and Operability Analysis
HCV	Heavy Commercial Vehicles
HDD	Horizontal Direction Drilling
HDV	Heavy Duty Vehicle
HGV	Heavy Goods Vehicle
HHRA	Human Health Risk Assessment
HHRAP	Human Health Risk Assessment Protocol
HIA	Health Impact Assessment

Abbreviation	Definition
HIC	Household, industrial and commercial waste
HMIP	Her Majesty's Inspectorate of Pollution
HPI	Habitat of Principal Importance
HRA	Habitat Regulations Assessment
HSC	Hazardous Substance Consent
HSE	Health and Safety Executive
HV	High Voltage
HWIDB	Hundred of Wisbech Internal Drainage Board
Hz	Hertz
IAQM	Institute of Air Quality Management
IBA	Incinerator Bottom Ash
ICNRP	International Commission on Non-Ionizing Radiation Protection
IDB	Internal Drainage Board
IDP	Infrastructure Delivery Plan
IED	Industrial Emissions Directive
IEMA	Institute of Environmental Management and Assessment
IMS	Information Management System
IMS	Integrated Management System
IOA	Institute of Acoustics
IPCC	Intergovernmental Panel on Climate Change
IRAP	Industrial Risk Assessment Program
ISO	International Organisation for Standardisation
ISO	International Standards Organisation
I-TEQ	Toxic Equivalent Emission derived by the international toxic equivalency factors
JNCC	Joint Nature Conservation Committee
JSNA	Joint Strategic Needs Assessment
KLIDB	King's Lynn Internal Drainage Board
KLWN	(the Borough Council of) King's Lynn and West Norfolk

Abbreviation	Definition
km	Kilometre
kt	Kilotonne
ktCO2e	Kilotonnes of carbon dioxide equivalent
kV	Kilovolt
Kwh	Kilowatt hour
LA	Local Authority
LAQM	Local Air Quality Management
LCA	Landscape Character Area
LCRM	Land Contamination Risk Management
LEMP	Landscape and Ecological Management Plan
LFG	Landfill Gas
LiDAR	Light Detection and Ranging
LLFA	Lead Local Flood Authority
LNR	Local Nature Reserve
LOAEL	Lowest Observed Adverse Effect Level
LoD	Limits of Deviation
LOLER	Lifting Operations and Lifting Equipment Regulations
LPA	Local Planning Authority
LTP	Local Transport Plan
LVIA	Landscape and Visual Impact Assessment
LVs	Light Vehicles
LWS	Local Wildlife Site
m	Metre
m bgl	Metres below ground level
MA&D	Major Accident and Disaster
MAFF	Ministry for Agriculture, Fisheries and Food
MAGIC	Multi Agency Geographic Information for the Countryside
mAOD	Metres above ordnance datum
MCC	Manual Classified Counts

Abbreviation	Definition
MDR	Maximum Deposition Rates (of metals on land)
mg/m3	Milligram per cubic metre
MHCLG	Ministry of House, Communities and Local Government
Ml/d	Million litres per day
Mm	Millimetre
MMO	Marine Management Organisation
MMP	Materials Management Plan
Mn	Manganese
MOD	Ministry of Defence
MP(s)	Member(s) of Parliament
MPH	Miles Per Hour
m/s	Metres per second
MSW	Municipal Solid Waste
Mt	Megatonne
Mtpa	Metric tonnes per annum
MW	Megawatt
MWe	Megawatt electricity
MWh	Megawatt hour
MWIA toolkit	Mental Wellbeing Impact Assessment toolkit
MWLP	Minerals and Waste Local Plan
MWt	Megawatt thermal
MWth	Megawatt of thermal output
NAEI	National Atmospheric Emissions Inventory
NAQO	National Air Quality Objectives
NAQS	National Air Quality Strategy
NATS	Formerly National Air Traffic Services – the main Air Navigation Service
NCA	National Character Area
NCC	Norfolk County Council

Abbreviation	Definition
NCN	National Cycle Network
NCV	Net Calorific Value
NE	Natural England
NERC 2006	The Natural Environmental and Rural Communities Act 2006 (as amended)
NFPA	National Fire Protection Agency (USA)
ng/m3	Nanogram per cubic metre
NGG	National Grid Gas
NGR	National Grid Reference
NH	National Highways
NHN	Natural Habitat Network
NH_3	Ammonia
NHBC	National House-Building Council
NHLE	National Heritage List for England
NHS	National Health Service
Ni	Nickel
NMU	Non-motorised Users
NNR	National Nature Reserve
NO_2	Nitrogen Dioxide
NOEL	No Observed Effect Level
NO_X	Oxides of Nitrogen
NPPF	National Planning Policy Framework
NPPG	National Planning Practice Guidance
NPPW	National Planning Policy for Waste
NPS	National Policy Statements
NPSE	Noise Policy Statement for England
NPSs	National Policy Statements
NRMM	Non-Road Mobile Machinery
NRSWA	New Roads and Street Works Act 1991

Abbreviation	Definition
NSIP	Nationally Significant Infrastructure Project
NSR	Noise Sensitive Receptor
NTM	National Traffic Model
NTS	Non-Technical Summary
NVMP	Noise and Vibration Management Plan
NVZ	Nitrate Vulnerable Zone
NWP	Numerical Weather Prediction
OA	Opportunity Area
OAPF	Opportunity Area Planning Framework
OHL	Overhead Line
ONS	Office for National Statistics
OTMP	Operational Traffic Management Plan
OS	Ordnance Survey
PAHs	Polycyclic aromatic hydrocarbons
PAHs	Polycyclic Aromatic Hydrocarbons
Pb	Lead
PC	Process Contribution
PCB	Polychlorinated biphenyl
PCCD/F	Dioxins
PCDDs	Polychlorinated dibenzo-p-dioxins
PCDFs	Polychlorinated dibenzofurans
PCM	Pollution Climate Mapping
PCP	Pentachlorophenol
PEC	Predicted Environmental Concentration (=PC + background)
PEIR	Preliminary Environmental Information Report
PFRA	Preliminary Flood Risk Assessment
pg/m^3	Picogramme per cubic metre
PHE	Public Health England
PHE	Public Health England

Abbreviation	Definition
PIA	Personal Injury Accident
PIC	Personal Injury Collision
PIL(s)	Person(s) with an Interest in Land
PINS	Planning Inspectorate
PM_{10}	Particulate Matter of Aerodynamic Diameter less than 10µm
$PM_{2.5}$	Particulate Matter of Aerodynamic Diameter less than 2.5µm
POC	Point of Connection
PPE	Personal Protective Equipment
PRoW	Public Right of Way
PSC	Potential Sources of Contamination
PUWER	Provision and Use of Work Equipment Regulations
PV	Photovoltaic
QHSE	Quality, Health, Safety and Environment
QI	Quality Index
RCV	Refuse Collection Vehicles
RDF	Refused Derived Fuel
RFI	Request For Information
RHPG	Registered Historic Parks and Gardens
RIGS	Regionally Important Geological and Geomorphological Sites
RBMP	River Basin Management Plans
ROWIP	Rights of Way Improvement Plans
RR(FS)O	The Regulatory Reform (Fire Safety) Order
RSPB	Royal Society for the Protection of Birds
s106	Section 106 of the Town and Country Planning Act 1990 (as amended)
SAC	Special Area of Conservation
SAR	Southern Access Road
Sb	Antimony
SCI	Statement of Community Involvement
SoS	Secretary of State

Abbreviation	Definition
SFRA	Strategic Flood Risk Assessment
SI	Statutory Instrument
SINC	Site of Importance for Nature Conservation
SM	Scheduled Monument
SMR	Standardised Mortality Ratio
SNCR	Selective non-catalytic reduction
SO_2	Sulphur Dioxide
SOAEL	Significant Observed Adverse Effect Level
SOCC	Statement of Community Consultation
SoCG	Statement of Common Ground
SoS	Secretary of State
SOx	Sulphur Oxides
SPA	Special Protection Area
SPD	Supplementary Planning Document
SPG	Supplementary Planning Guidance
SPZ	Source Protection Zone
SQWEECH	Safety, Quality, Wellbeing, Energy, Environment, Community and Health
SRN	Strategic Road Network
SSAC	Site Specific Assessment Criteria
SSSI	Site of Special Scientific Interest
SuDS	Sustainable Drainage Systems
SWMP	Site Waste Management Plan
SWMP	Surface Water Management Plan
t	Tonne
TA	Transport Assessment
TCC	Temporary Construction Compound
TDI	Tolerable Daily Intake
Ti	Thallium

Abbreviation	Definition
TN	Target Note
TNA	The National Archive
TOC	Total Organic Carbon
TOMPS	Toxic Organic Micropollutants
TP	Travel Plan
tpa	Tonnes per annum
TPO	Tree Preservation Order
TRN	Trunk Road Network
TSS	Total suspended solids
TVIA	Townscape and Visual Impact Assessment
TVOC	Total Volatile Organic Carbon
UGC	Underground Cable
UKCP	UK Climate Projections
UKPN	UK Power Networks
UKWIN	UK Without Incineration Network
US EPA	US Environmental Protection Agency
UXO	Unexploded Ordnance
V	Vanadium
veh/h	Vehicles per hour
VOCs	Volatile Organic Compounds
VP	Viewpoint
WAS	Wisbech Access Strategy
WFD	Water Framework Directive
WHA	Wasteland Habitat Area
WHO	World Health Organisation
WHS	World Heritage Site
WIA 1991	Water Industry Act 1991 (as amended)
WIncD 2000	Waste Incineration Directive (2000/76/EC)
WMS	Waste Management Strategy

Abbreviation	Definition
WPA	Waste Planning Authority
WRA 1991	Water Resources Act 1991
WRAP	Waste and Resources Action Programme
WRB	Waste Reception Building
WSI	Written Scheme of Investigation
WTS	Waste Transfer Station
ZOI	Zone of Influence
ZTV	Zone of Theoretical Visibility