# Borough Council of King's Lynn and West Norfolk Relevant Representation Summary

## Introduction

The Borough Council of King's Lynn and West Norfolk (BCKLWN) have been involved in pre-application discussions with the applicant. However, there remains some areas where queries remain. The Council seeks these matters be resolved prior to any consent being given to the scheme.

The full Relevant Representation response includes appendices with Councillor comments, a Planning Committee Report, additional representations and Minutes.

Norfolk County Council (NCC) have commented separately and have also provided comments that relate to Norfolk.

At the Council meeting on 25 February 2021, a motion was passed to object to the principle of the proposal for an energy from waste facility in Wisbech. It is important to note that this remains in place and is unaffected by this specific technical consultation response.

## Noise/Vibration

A simpler presentation for the non-expert reader to enable easier identification of the outcomes of this technical assessment would be welcomed.

## Construction Noise/Dusts

Request a suitably worded planning condition to restrict construction related delivery times/vehicle movements and produce a detailed and robust site construction environmental management plan.

The connection to the grid (at Walsoken substation) is to be undertaken during night-time hours. We would wish to see a separate construction management plan for this phase of the project. This should include direct resident notification of the dates and times of works, and likely operations.

It is noted there is an Outline Construction Environment Management Plan. Site specific measures are to be further specified in the full document secured via the planning process as pre-commencement documents.

Providing the new access route via the Cromwell Road link as early as possible in the development scheme, would greatly reduce the impact on West Norfolk. This would be welcomed as a condition.

## Operational Noise

It is acknowledged that there should be no noticeable impact from the operation of the site on West Norfolk residents. We would expect an updated NMP to be submitted for approval by all the relevant consultees prior to the operation of the installation on the site, which should include assessment of the Walsoken substation.

## Vibrations

Further assessment of vibration impacts on residential properties during the connection to grid at Walsoken substation, is welcomed.

Mitigation could be incorporated into the CEMP for the grid connection phase.

## Air Quality

To help understand background air quality and monitor changes in traffic we have already established diffusion tube ($NO_2$) monitoring points in the area. As confirmed at the earlier scoping opinion PINS had recommended that all air quality monitoring locations should be identified on a plan. There is also Dept. of Transport traffic survey points along parts of the network that show actual daily movements.

### Operational Phase

Receptors to the pollutants extend into this Council's area around the eastern part of the air quality study area.

The plume is presented spatially by $NO_2$ concentration contours for emissions from the chimney only (section 6.2.2) with both annual and short-term means within Figures 8.5 and 8.6 presented. As can be seen there are two areas affected from the plume as it disperses back towards ground level. The plume extends for the most part in a NE direction from the site but with a slight deflection towards the A47.

Air dispersion modelling shows the largest contribution to emissions is from the chimney (0.78 $\mu gm^{-3}$ $NO_2$) with only a small component arising from associated operational traffic (0.01 $\mu gm^{-3}$ $NO_2$). This occurs close to the junction between Algores Way / Weasenham Lane, which is located in Wisbech (not West Norfolk).

This area is also associated with largest Process Contribution (PC) from particulate matter (0.08 $\mu gm^{-3}$ $PM_{10}$ and 0.05 $\mu gm^{-3}$ $PM_{2.5}$). Highest ground level $SO_2$ PC concentration is however located at Receptor R5 just SW of the site.

As precautionary, receptor locations have been selected to extend beyond the plume area towards Elm, Emneth and also Broadend Rd and where a below ground grid connection is proposed at the Walsoken substation. The air quality management areas in King's Lynn and villages of West Walton, Walton Highway fall outside of lowest emission contour (0.3 $\mu gm^{-3}$ as $NO_2$) and therefore study area. Outside of this area impacts are considered as insignificant. The study area is however extended by 15km from the chimney in accordance with EA guidance to take account of ecological receptors. Choice of receptor locations appears to be representative.

In terms of impacts during the operational period the emissions have been modelled based on an opening year of 2027 against its respective baseline with emissions from traffic and the stack combined. As noted within our Technical Queries that are outstanding there are numerous minus traffic input values that have been used for the air quality modelling which does not appear to be possible.

The Energy from Waste plant will be supported by an emergency back-up generator, which has been modelled based on emergency use of up to 2 hours per month and no more than 60-hours annually. Operational periods in excess of these periods can potentially be a matter for the Environmental Permit with conditions for their control. Modelling of routine generator testing however appears to be missing from the modelling.

Abnormal events will be detected by an automatic monitoring system for pollutants with an averaging period of 1-hour as set out in Chapter 8, triggering an interlock to prevent further waste being charged. For other pollutants during these events emission rates have been calculated. This is designed to ensure compliance with the EA permit and Article 46(6) of the IED. Abnormal events include failure of a filter bag with a potential impact on PM / Metals, lime dosing (acid gases) or the urea dosing (an impact NOx).

In terms of cumulative impacts from other point sources, especially larger Part A1 permitted processes in Wisbech that are regulated by the Environment Agency, the applicant has explained previously and as documented in Appendix 8A that these installations operating prior to 2020 were below reporting thresholds and at a level considered insignificant. As these emissions are incorporated within Defra's background these emissions have therefore been assessed indirectly.

Summary of the overall air quality impacts being reported by Medworth

In terms of overall impacts they are summarised below:

> *Impacts in terms of the pollutants form chimney and traffic have been assessed as not significant at all modelled receptors including those in West Norfolk. This is based on Institute Air Quality Management guidance i.e. process contribution will be less than 1% of the NAQS objectives.*
>
> *For the majority of all pollutants, the modelling is predicted to be less than 5% of the long-term emission limits and less than 10% of the short-term limits.*

Technical Queries

In reaching the above conclusions we have reviewed the predicted emissions that fall under scope of LAQM and against the NAQS standards and whilst the methodology is acceptable in principle, there remains a number of matters that need further clarification. These include matters associated to air quality for transport related issues, dispersion modelling, health damage costs and a suitable air quality monitoring scheme. Further detail of these are included within the full BCKLWN Relevant Representations response.

## Landscape and Visual

The retention of as many mature/important trees is key, and any mitigation/replacement planting should be in keeping with the wider landscape. Full details of landscaping should be secured via condition.

## Historic Environment

There will be no significant impact on the setting of heritage assets within this Borough. NCC have commented separately with respect to archaeology.

## Hydrology

In west Norfolk the flood risk issues at the grid connection point will need to be addressed. This should include an appropriate flood emergency plan during both the construction phase and also the running phases.

## Geology, Hydrogeology and Contaminated Land

Based on the information provided we can agree that, providing the environmental measures, including further investigation (as set out in the Table 13.24 summary of environmental measures) are followed, the risks will be acceptable and no significant effects from land contamination are anticipated.

## Climate Change

It is noted that Cambridgeshire County Council and their consultants have raised some very detailed and specific queries that will need to be fully considered and addressed at Examination.

## Health

National health and technical guidance on Energy from Waste plants and emissions will be provided by the UK Health & Safety Agency.

## Major Accidents and Disasters

It is recommended comments are sought from Norfolk Fire and Rescue Service, Norfolk Constabulary and Eastern Region Special Operation's Unit.

## Cumulative Impacts

No further comments from a BCKLWN view, other than set out in the individual topic chapters.

## Other Matters

### Lighting

We have no concerns, but we would support Fenland District Council and recommend full details are required via condition.

### Waste Policy Matters

Waste policy matters, including waste availability and composition, net self-sufficiency, and site selection, have been covered in the relevant representations of Cambridgeshire County Council, as the specialist waste planning authority for the area.

Any waste policy issues affecting Norfolk, will be covered by NCC, as the specialist waste planning authority for our area.