Medworth Energy from Waste
Combined Heat and Power Facility

PINS ref. EN010110
Document Reference Vol.9.23
Revision 1.0
Deadline 1
March 2023

Summary of Oral Submissions made by Interested Parties at Open Floor Hearings 1 and 2 and the Applicant's Response

We inspire with energy.

Contents

1. Introduction

1.1 Background

1.1.1 Two Examination Open Floor Hearings (OFHs) were held on 22 and 23 February 2023 respectively. The hearings provided an opportunity for registered Interested Parties (IPs) to make oral representations about the application. Each IP making an oral submission was requested to provide a written summary note to the ExA for deadline 1 (10 March).

1.2 Purpose of this Document

1.2.1 This document sets out the Applicant's response to the comments made at both OFHs with Tables 2.1 to 2.7. The comments have been grouped by the Applicant into topics where the matters raised are considered similar. Where the Applicant has made commitments, the relevant application documentation is identified.

1.2.2 This document also provides a written summary of the oral submissions made on behalf of the Applicant at OFH 1 and 2 in the time allocated by the Examining Authority.

1.3 Summary of the Applicant's Oral Submissions at OFH 1 and 2

1.3.1 Mr Carey, Managing Director of MVV, on behalf of the Applicant acknowledged the fears and concerns presented by the Interested Parties and suggested that as these individuals endeavour to attend the Issue Specific Hearings on environmental matters that will be held by the ExA in the upcoming months. Mr Carey explained that these Issue Specific Hearings will discuss these environmental topics in greater detail than can be afforded to them at the OFH.

1.3.2 Mr Carey stressed that the purpose of the Proposed Development is to divert waste from landfill and turn it into useful energy, either in the form or electricity or heat. Wisbech is a region that currently lacks energy recovery capacity, and the Proposed Site is an ideal location for this energy to be utilised. Energy from Waste facilities in cities have the best chance of providing combined heat and power, as the Applicant does in Plymouth and intends to do with the Proposed Development.

1.3.3 Mr Carey emphasised that the energy produced by the Proposed Development would be used locally and nationality and is entirely in line with Government policies.

1.3.4 Mr Carey added that Norfolk County Council currently sends its waste to a facility in Bedfordshire, much of it going past the A47, despite its commitment to a 'no-incineration policy.' This process currently means that the waste travels directly past the site for the Proposed Development. Cambridgeshire County Council currently sends its waste to landfill and is the country that sends the most amount of waste to landfill than any other county council. Cambridgeshire County Council has a facility at Waterbeach, in the north of Cambridge, which is not currently operating. These

are examples of the current practices that the Proposed Development is aiming to rectify.

1.3.5 Mr Carey then directly addressed several of the concerns raised.

Emissions

1.3.6 Mr Carey urged individuals to attend the Issue Specific Hearing on this topic. The Health Protection Agency have provided confirmation that emissions from the Proposed Development are not of risk to the public, and the Human Health Risk Assessment submitted by the Applicant provides confirmation of this.

Need

1.3.7 Mr Carey stressed the need for the scheme to aid in the UK's attempts to boost energy security. Developments generating energy from waste are essential to make up the shortfall of other renewable energy supply methods, which cannot run all of the time (i.e. solar, wind). There is a need for the Proposed Development as it provides a baseload of electricity to the local grid.

Traffic

1.3.8 Mr Carey emphasised that the local road infrastructure is capable of handling the additional traffic that will be brought in by the Proposed Development. It was also stressed that the Proposed Development will not disrupt the development of the railway in Wisbech, but rather, the Applicant would wish for the railway line to be developed to enable waste to be brought to the Proposed Development by rail.

1.3.9 Mr Carey clarified that there will be 284 Heavy Goods Vehicle (HGV) movements to the Proposed Development, being 142 HGVs going in and 142 HGVs going out. However, HGVs will not go through the town centre, instead they will come up the A47, Cromwell Road and down New Bridge Lane.

1.3.10 Mr Carey stated that the baseline traffic modelling used for the Proposed Development was done with surveys carried out in October 2021 and was agreed with Cambridgeshire County Council's Highways Department.

Odour

1.3.11 Mr Carey stressed that the facility will not produce a foul smell, nor will flies be attracted to the Proposed Development.

Fly ash

1.3.12 Mr Carey clarified that the amounts of fly ash produced will be no more than 5% for the total of air pollution control residues, far below the 25% stated in one oral submission. Further explanations of the reasons behind these statements will be provided at the Issue Specific Hearings.

Flooding

1.3.13 Mr Carey stated that a detailed flood risk assessment was undertaken, which takes into account all the predicted levels of flooding and the anticipated risk. Mr Carey emphasised that the Proposed Development does not present any risk.

1.3.14 Mr Carey also stated that the Proposed Development does not require a large amount of water and that the water used is not wasted.

Local Economy

1.3.15 Mr Carey stated that local businesses do not need to be concerned about the compulsory acquisition powers sought in respect of Algores Way. The Applicant has no intention to attain private ownership of the road or block access, but rather proposed to designate the road as a public highway, if the local highway authority confirmed that it wished to adopt the road.

1.3.16 In relation to the creation of jobs, Mr Carey stressed the Applicant's desire to be a good neighbour to the community, as is the case in Plymouth, Dundee and near Sittingbourne in Kent where the Applicant has other facilities. The Applicant believes in training young people, and demonstrated through their apprenticeship and internship programmes, and intends to exercise these programmes within the Proposed Development.

1.3.17 Finally, Mr Carey stressed the Applicant's intentions to follow the prescribed process and ensure that the contents of all application documents are truthful and accurate. All Government policy on waste incineration will be complied with, including aims to move waste up the waste hierarchy. Mr Carey assured attendees that the Proposed Development will not impact recycling targets and will provide high quality maintenance jobs that will have a direct, positive impact on the local economy.

5 Summary of Oral Submissions made by Interested Parties at Open Floor Hearings 1 and 2 and the Applicant's Response

Table 2.1 Waste Fuel Availability

ID	Matter raised	Applicant Response	Where commitment is secured in the DCO (if applicable)
WF00	**Insufficient volume of waste** *Concerns were raised that there is insufficient waste availability to fuel the Proposed Development*		
WF01	The waste data used for the Waste Fuel Availability Assessment is unreliable in respect of data outside of local authority control.	The **WFAA (Volume 7.3) [APP-094]** is based on publicly available waste data from a range of credible sources including DEFRA, the Environment Agency, evidence bases from relevant Waste Local Plans and published research papers.	
WF02	There is an incinerator in Peterborough that is operational and there is not enough waste to feed both facilities; it would be necessary to import waste from further afield.	The Peterborough EfW Facility operated by Viridor, with a capacity of 85,000 tonnes per annum, has been included as existing capacity within the **WFAA (Volume 7.3) [APP-094]**. In addition, planning consent was granted in 2009 to Peterborough Green Energy Ltd (PGEL) for a 650,000 tonnes per annum energy from waste facility in Peterborough. However, this consented facility has yet to be built. After almost 14 years, the Applicant considers it unlikely that the PGEL facility will be developed because it relies on Advanced Combustion Technology, which the UK funding market is reluctant to fund. Notwithstanding this, the consented waste management capacity offered by the PGEL facility was included in the **WFAA (Volume 7.3) [APP-094].**Even including this existing and potential future	

ID	Matter raised	Applicant Response	Where commitment is secured in the DCO (if applicable)
		capacity in Peterborough, there remains a need for the additional capacity offered by the Proposed Development.	
WF03	Norfolk currently sends waste to Bedford but will be sent to the Proposed Development instead. This will deprive other incinerators of feedstock, causing them to drop in performance. Alternatively, the waste from the local counties will not be available for the Proposed Development.	The **WFAA (Volume 7.3) [APP-094]** is a robust analysis of future residual waste management needs at both a localised and national level. The assessment includes consideration of future needs taking into account existing Waste Planning Authority (WPA) recycling levels and the achievement of a range of recycling targets. The assessment also takes account of all existing operational and non-operational energy from waste capacity – including capacity that is in the planning system and has yet to be consented. Even accounting for such additional capacity, the assessment has concluded that there remains a shortfall in residual waste management capacity. As such, rather than take waste away from existing facilities, the Proposed Development would provide capacity needed to divert residual waste that is currently sent to landfill.	
WF04	Quoted figures are unachievable and unsustainable due to the insufficiency of waste already available for incineration. Demand will decrease, and such a large development will rely on commercial waste. This will also discourage businesses from aiming for waste reduction.	All the data used in the WFAA are from publicly available and credible sources including DEFRA, the Environment Agency, and evidence bases from relevant Waste Local Plans and published research papers. The focus of the **WFAA (Volume 7.3) [APP-094]** is on the availability of residual waste i.e., that part of the waste stream that is left over after reuse, recycling and other forms of recovery have taken place. It is therefore implicit in the **WFAA (Volume 7.3) [APP-094]** that the fraction of the	

ID	Matter raised	Applicant Response	Where commitment is secured in the DCO (if applicable)
		household and commercial waste stream that is 'residual' is not able to be managed in any other way apart from incineration (with or without energy recovery) or landfill. Additionally, (and importantly), the **WFAA (Volume 7.3) [APP-094]** only considers the need for the Proposed Development in the context of how much residual waste will require management in the future. In other words, the achievement of national targets for the recycling and reuse of waste has already been taken into account when considering how much residual waste is likely to require management in the future.	
WF05	There is an incinerator in Peterborough and another awaiting decision in Boston; another one is not necessary.	The Peterborough EfW Facility operated by Viridor, with a capacity of 85,000 tonnes per annum, has been included as existing capacity within the **WFAA (Volume 7.3) [APP-094]**. Planning consent was granted in 2009 to Peterborough Green Energy Ltd (PGEL) for a 650,000 tonnes per annum energy from waste facility in Peterborough. However, this consented facility has yet to be built. After almost 14 years, MVV considers it unlikely that the PGEL facility will be developed because it relies on Advanced Combustion Technology, for which the UK funding market is reluctant to fund. Notwithstanding this, the consented waste management capacity offered by the PGEL facility has been included in the WFAA. Even including this existing and potential future capacity, there remains a need for the additional capacity offered by the Proposed Development. In addition to this, the proposed energy from waste facility at Boston has been included as consented and operational	

ID	Matter raised	Applicant Response	Where commitment is secured in the DCO (if applicable)
		capacity in the **WFAA (Volume 7.3) [APP-094] - see Appendix C of the WFAA (Volume 7.3) [APP-094].** As with the capacity offered by the PGEL facility, even including the proposed Boston facility, there remains a need for the additional capacity offered by the Proposed Development.	
WF06	In October 2013 DEFRA removed Norfolk's PFI for the EfW Facility because it was not required, which caused the lead contract to be cancelled due to there being no financial viability.	Noted. However, contractual arrangements for managing residual waste are entirely separate to considerations around the need for additional capacity to manage such material. In 2019, Norfolk sent almost 95,000 tonnes of household, industrial and commercial waste to landfill (see Table 4.4 of the **WFAA (Volume 7.3) [APP-094].** In addition to this, Norfolk currently sends the remainder of its residual household waste to an energy recovery facility in Bedfordshire (Rookery South).	
WF07	There is not enough waste, if the Proposed Development limited its feedback stock to purely residual waste, then their profit capacity would be halved.	The **WFAA (Volume 7.3) [APP-094]** is a robust analysis of future residual waste management needs at both a localised and national level. The assessment includes consideration of future needs taking into account existing WPA recycling levels and the achievement of a range of recycling targets. In this regard, the **WFAA (Volume 7.3) [APP-094]** concludes that by 2030, it is predicted that even if the Government's ambitious combined recycling target of 65% for municipal and 'municipal like' commercial and industrial waste is realised, there would remain a minimum shortfall of ~2.8 million tonnes of residual Household, Industrial and Commercial (HIC) capacity in the UK (rising to over 6 million tonnes if the Government's recycling target is undershot by	

ID	Matter raised	Applicant Response	Where commitment is secured in the DCO (if applicable)
		5%). There is significant doubt on the achievability of this recycling target. In 2021, municipal waste recycling stood at 43.8% - a level which falls well below the achievement of the 2020 target of 50%. To achieve the Government's new, more stringent target of 65% by 2035, there needs to be an increase of over 21% in recycling in England over the next 14 years.	
WF08	Incineration plants are already at overcapacity, the only reason that this Development is being built is for profit. The incineration rate in 2020 was 45.5%; the Government's 65% recycling target implies the rate of incineration should be a maximum of 30%.	The **WFAA (Volume 7.3) [APP-094]** is a robust analysis of future residual waste management needs at both a localised and national level. The assessment includes consideration of future needs taking into account existing WPA recycling levels and the achievement of a range of recycling targets. In this regard, the **WFAA (Volume 7.3) [APP-094]** concludes that by 2030, it is predicted that even if the Government's ambitious combined recycling target of 65% for municipal and 'municipal like' commercial and industrial waste is realised, there would remain a minimum shortfall of ~2.8 million tonnes of residual HIC capacity in the UK (rising to over 6 million tonnes if the Government's recycling target is undershot by 5%). There is significant doubt on the achievability of this recycling target. In 2021, municipal waste recycling stood at 43.8% - a level which falls well below the achievement of the 2020 target of 50%. To achieve the Government's new, more stringent target of 65% by 2035, there needs to be an increase of over 21% in recycling in England over the next 14 years.	

ID	Matter raised	Applicant Response	Where commitment is secured in the DCO (if applicable)
WF09	The waste hierarchy places incineration at the bottom, and as the demand for steam decreases this will not improve.	One of the guiding principles, that underpins national and local waste management policy of sustainable waste management is the concept of a hierarchy of waste management options (waste hierarchy), where the most desirable option is not to produce the waste in the first place (waste prevention) and the least desirable option is to dispose of the waste with no recovery of either materials and/or energy i.e., landfill. Between these two extremes there are a wide variety of waste treatment options that may be used as part of a waste management strategy to recover materials. Residual waste, which the Proposed Development proposes to process, is mixed waste that cannot be usefully reused or recycled and is either destined for landfill, the least sustainable form of waste management, or could be incinerated (under strictly controlled conditions) to recover valuable energy in the form of electricity and/or heat, via a process commonly known as Energy from Waste (EfW). By diverting residual waste away from landfill to EfW, the principles established by the waste hierarchy are met. Further details of the national and local planning policies that support the principle of sustainable waste management, including the waste hierarchy and how these are applied to the Proposed Development are reported in the **Planning Statement (Volume 7.1) [APP-091].** To commit to compliance with the waste hierarchy, and to provide a clear auditable trail to demonstrate compliance with the waste hierarchy, the Applicant proposes a DCO Requirement.	Compliance with the waste hierarchy secured by Draft DCO Requirement 14 [APP-013]

ID	Matter raised	Applicant Response	Where commitment is secured in the DCO (if applicable)
		To instil the principles of the waste hierarchy, the Applicant is committed to providing community benefits, including waste awareness and education; these are set out in the following document: **Outline Employment and Skills Strategy (Volume 7.8) [APP-099]** which has been developed in consultation with Norfolk County Council includes the following proposals: • A waste education programme and support for higher and further education establishments, including STEM support; and • Apprenticeships, Internships and work experience/placements.	The Employment and Skills Strategy is secured by draft DCO Requirement 21 [APP-013].
WF10	If the waste must be transported from 2 hours away, then the Development should be built closer to the waste.	Waste markets in the UK are directly influenced by a range of factors including waste type, availability of management capacity and government fiscal, waste management and planning policies. Whilst waste should be managed as close as possible to its point of origin, the complex range of influencing factors inevitably means there is a flow of material across the country (and beyond). In this context, it is important to recognise that the Proposed Development is likely to draw in waste from a wider area than, say, simply Cambridgeshire, and that over the life of the Proposed Development, the area from which it will receive waste material could change. The local analysis of need set out in the **WFAA (Volume 7.3) [APP-094]** has been based on the area that the Proposed	

ID	Matter raised	Applicant Response	Where commitment is secured in the DCO (if applicable)
		Development is most likely to draw waste in from. This has been defined as an area approximately a 2-hour drive time from the Proposed Development. This study area would likely remain the same if the Proposed Development were in another part of the East of England. This is because it is generally commercially viable to transport non-hazardous household, industrial and commercial waste from up to around 2 hours away; over 2 hours the haulage cost becomes increasingly expensive.	
WF12	Outdated legislation has been used to draw conclusions on local council future waste management capacity; with the revised waste targets, the waste providing authorities will not have a shortfall in residential waste management capacity between 2042 and 2066.	The **WFAA (Volume 7.3) [APP-094]** is based upon the latest available data and up to date legislation at the time of writing. However, it is acknowledged that since its submission in June 2022, updated data has been made available and policy changes have taken place. With this in mind, as part of the Examination process, the **WFAA (Volume 7.3) [APP-094]** will be updated to reflect the latest data and policy. The updated document will be provided at Deadline 2 (24 March 2023)	
PP00	**Proximity Principle** *Concerns were raised that distance from which waste would be brought to the Proposed Development was too far and contrary to the Proximity Principle.*		
PP01	The distance proposed is too far and exceeds the limits set by the proximity principle.	In respect of the need issue, the **WFAA (Volume 7.3) [APP-094]** has assessed both the regional requirement for the EfW CHP Facility as well as the national need. This has concluded that there is insufficient residual waste management capacity available to ensure that non-	

ID	Matter raised	Applicant Response	Where commitment is secured in the DCO (if applicable)
		recyclable waste can be managed as far up the waste hierarchy as possible (i.e., diverted from landfill) and in a manner which complies with the proximity principle (i.e., treating waste as close as possible to its point of arising). Furthermore, the local analysis of need has been based on the area that the Proposed Development is most likely to draw waste in from. This has been defined as an area approximately a 2-hour drive time from the Proposed Development. This is because it is generally commercially viable to transport non-hazardous household, industrial and commercial waste from up to around 2 hours away, over 2 hours the haulage cost becomes increasingly expensive.	
PP02	The HGVs will bring waste from a 200 mile radius which exceeds the proximity principle.]	The local analysis of need has been based on the area that the Proposed Development is most likely to draw waste in from. This has been defined as an area approximately a 2-hour drive time from the Proposed Development. This is because it is generally commercially viable to transport non-hazardous household, industrial and commercial waste from up to around 2 hours away, over 2 hours the haulage cost becomes increasingly expensive. Graphic 2 in Section 3 of the **WFAA (Volume 7.3) [APP-094],** illustrates the Study Area for the fuel availability assessment. Based on the indicative 2-hour drive time, the furthest point away from the Proposed Development in the Study Area is approximately 100 miles away (south Essex).	

ID	Matter raised	Applicant Response	Where commitment is secured in the DCO (if applicable)
PP03	Plans go against the proximity principle as set out in the Waste (England and Wales) Regulations 2011, as waste will be collected from up to 164km away. Many other incinerators will be passed on the journey.	In respect of the need issue, the **WFAA (Volume 7.3) [APP-094]** has assessed both the regional requirement for the EfW CHP Facility as well as the national need. This has concluded that there is insufficient residual waste management capacity available to ensure that non-recyclable waste can be managed as far up the waste hierarchy as possible (i.e., diverted from landfill) and in a manner which complies with the proximity principle (i.e., treating waste as close as possible to its point of arising). The local analysis of need has been based on the area that the Proposed Development is most likely to draw waste in from. This has been defined as an area approximately a 2-hour drive time from the Proposed Development. This is because it is generally commercially viable to transport non-hazardous household, industrial and commercial waste from up to around 2 hours away, over 2 hours the haulage cost becomes increasingly expensive.	

Table 2.2 Health Impacts

ID	Matter raised	Applicant Response	Where commitment is secured in the DCO (if applicable)
YP00	**Young people** *Concerns were raised about the health implications for students at the numerous schools within the vicinity of the Proposed Development.*		
YP01	There are seven schools within a 0.5 mile radius of the Proposed Development, who will be affected by toxins.	The air quality assessment presented in **ES Chapter 8: Air Quality (Volume 6.2) [APP-035]**, includes the approach in identifying the Receptors that required consideration. The Receptors identified included the closest Receptors to the emissions sources (chimney and traffic), to ensure the impact on local community, including the closest schools, was considered. **ES Appendix 8B Chapter 8 Air Quality Appendices) (Volume 6.4) [APP-078]** provides a list of Receptors considered, including the closest schools (Thomas Clarkson Academy, Meadowgate Academy, Elm Road Primary School, Ramnoth Road Junior, Wisbech Grammar School, Peckover Primary School and Orchard Church of England School) to the Proposed Development. These Receptors are also presented in **Figure 8.3: Modelled Receptor**, **Volume 6.3 ES Chapter 8 Air Quality Figures (Volume 6.3) [APP-052].** The assessment concludes that the effects upon all these Receptors would not be significant.	
YP02	Many of these schools are located north of the Proposed Development which is the prevailing wind direction	The air quality assessment presented in **ES Chapter 8: Air Quality (Volume 6.3) [APP-035]**, includes the approach in identifying the Receptors that required consideration, including the closest schools. In addition, the assessment of emissions to air considered	

ID	Matter raised	Applicant Response	Where commitment is secured in the DCO (if applicable)
		5 years of meteorological data to ensure all potential weather conditions are assessed, including the prevailing wind direction. **ES Appendix 8B Chapter 8 Air Quality Appendices) (Volume 6.4) [APP-078]** provides a list of Receptors considered, including the closest schools (Thomas Clarkson Academy, Meadowgate Academy, Elm Road Primary School, Ramnoth Road Junior, Wisbech Grammar School, Peckover Primary School and Orchard Church of England School) to the Proposed Development. These Receptors are also presented in **Figure 8.3: Modelled Receptor**, **Volume 6.3 ES Chapter 8 Air Quality Figures (Volume 6.3) [APP-052].** The assessment concludes that the effects are considered not significant.	
YP03	The all-party parliamentary group on air pollution published papers in December 2021 showed that proximity to incinerators has a correlation with cancer risk in children.	In 2019 Public Health England (PHE), now the UK Health Security Agency (UKHSA), published a guidance on '*PHE statement on modern municipal waste incinerators (MWIs) study*' reporting on the outcomes of two major studies on municipal waste incinerators and health impacts. UKHSA is the national technical expert on possible impacts on health of energy from waste facilities. The guidance states 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. This view is based on detailed assessments of the effects of air pollutants on health and on the fact that these incinerators make only a very small contribution to local concentrations of air pollutants.*"	

ID	Matter raised	Applicant Response	Where commitment is secured in the DCO (if applicable)
		The Proposed Development will operate under an Environmental Permit managed by the Environment Agency that stipulates a series of controls and monitoring that will ensure compliance with the emissions to air limits that are set to ensure no significant risk to human health.	
YP04	Increased carcinogens and particles will have health impacts on the children in schools, nurseries and care homes.	The assessment of emissions to air from the Proposed Development, as presented in **ES Chapter 8: Air Quality (Volume 6.2) [APP-035]**, include all relevant pollutants stipulated in legislation (i.e., particles, metals, etc.). In 2019 Public Health England (PHE), now the UK Health Security Agency (UKHSA), published a guidance on '*PHE statement on modern municipal waste incinerators (MWIs) study*' reporting on the outcomes of two major studies on municipal waste incinerators and health impacts. UKHSA is the national technical expert on possible impacts on health of energy from waste facilities. The guidance states 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. This view is based on detailed assessments of the effects of air pollutants on health and on the fact that these incinerators make only a very small contribution to local concentrations of air pollutants.*" In view of the above and the findings of the air quality assessment and Human Health Risk Assessment (**ES Chapter 8 Air Quality Appendix 8B Air Quality Technical Report, Annex Human health Risk Assessment Volume 6.4 APP-078**) it can be	

ID	Matter raised	Applicant Response	Where commitment is secured in the DCO (if applicable)
		concluded that effects upon children in schools would be negligible and not significant. The Proposed Development will operate under an Environmental Permit managed by the Environment Agency that stipulates a series of controls and monitoring that will ensure compliance with the emissions to air limits that are set to ensure no significant risk to human health.	
YP05	A report by the British Society for Ecological Medicine 2005 (updated in 2008) demonstrated the risks of particulate emissions on cardiovascular mortality and childhood cancer. PM2.5 particulates and below are a huge source of these health issues.	The assessment of emissions to air from the Proposed Development, as presented in **ES Chapter 8: Air Quality (Volume 6.2) [APP-035]**, include all relevant pollutants stipulated in legislation including $PM_{2.5}$ and conclude that effects would be not significant. In 2019 Public Health England (PHE), now the UK Health Security Agency (UKHSA), published a guidance on '*PHE statement on modern municipal waste incinerators (MWIs) study*' reporting on the outcomes of two major studies on municipal waste incinerators and health impacts. UKHSA is the national technical expert on possible impacts on health of energy from waste facilities. The guidance states 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. This view is based on detailed assessments of the effects of air pollutants on health and on the fact that these incinerators make only a very small contribution to local concentrations of air pollutants.*"	

ID	Matter raised	Applicant Response	Where commitment is secured in the DCO (if applicable)
		The Proposed Development will operate under an Environmental Permit managed by the Environment Agency that stipulates a series of controls and monitoring that will ensure compliance with the emissions to air limits that are set to ensure no significant risk to human health	
AP00	**Air Pollution** *Concerns were raised about contaminated air resulting from the Proposed Development*		
AP01	There is no safe level of particulates, and local people will be breathing contaminated air. A British Medical Journal article in 2019 demonstrated associations between PM2.5 concentrations and pulmonary cardiovascular diseases, even where the PM2.5 levels were below the WHO recommended amount.	The assessment of emissions to air from the Proposed Development, as presented in **ES Chapter 8: Air Quality (Volume 6.2) [APP-035]**, include all relevant pollutants stipulated in legislation including $PM_{2.5}$ and conclude that effects would be not significant. In 2019 Public Health England (PHE), now the UK Health Security Agency (UKHSA), published a guidance on '*PHE statement on modern municipal waste incinerators (MWIs) study*' reporting on the outcomes of two major studies on municipal waste incinerators and health impacts. UKHSA is the national technical expert on possible impacts on health of energy from waste facilities. The guidance states 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. This view is based on detailed assessments of the effects of air pollutants on health and on the fact that these incinerators make only a very small contribution to local concentrations of air pollutants.*"	

ID	Matter raised	Applicant Response	Where commitment is secured in the DCO (if applicable)
		The Proposed Development will operate under an Environmental Permit managed by the Environment Agency that stipulates a series of controls and monitoring that will ensure compliance with the emissions to air limits that are set to ensure no significant risk to human health.	
AP02	Over half of the cost of construction is put towards air pollution control equipment. If waste were not burnt but were properly recycled, this expensive equipment would not be necessary, nor would toxic ash collectors.	In the Applicant's experience the cost of the air pollution control equipment is less than 10% of the total cost of construction. The Proposed Development will be designed to treat residual waste, that is mixed waste that cannot be usefully reused or recycled and is either destined for landfill, the least sustainable form of waste management, or could be incinerated (under strict controlled conditions) to recover valuable energy in the form of electricity and/or heat. It is not the Applicant's intention to treat recyclable materials. The Proposed Development has been designed to ensure that all emissions to air are adequately controlled using Best Available Techniques (BAT). The rationale behind the choice of BAT is detailed in the BAT assessment submitted with the Environmental Permit application. It should also be noted that the Proposed Development is corporate funded, therefore does not require public money, see **Funding Statement (Volume 4.2) [APP-016]**.	
AP03	More clarity is needed on what the air quality modelling assumes, given the nature of the equipment. Further clarification is needed as to	The air quality assessment is presented in **ES Chapter 8: Air Quality (Volume 6.2) [APP-035]** and the full list of modelling assumptions in **ES Appendix 8B Air Quality Appendices)**	

ID	Matter raised	Applicant Response	Where commitment is secured in the DCO (if applicable)
	why selective catalytic reduction techniques have not been adopted.	**(Volume 6.4) [APP-078].** The emission concentrations for the pollutants that required consideration, including nitrogen oxides (NOx), were based on the Best Available Techniques (BAT) Associated Emission Levels (BAT-AELs) established by the European Commission in a series of sectoral BAT Reference (BREF) documents. The pollutant emission concentrations considered were in line with the Environmental Permit Regulation (England and Wales) Regulations 2016 (as amended) that apply to the Proposed Development and have been set considering the BAT available. Selective catalytic reduction (SCR) is an abatement control method used to reduce emissions of NOx. The Proposed Development has incorporated NOx abatement in the form of Selective Non-Catalytic Reduction (SNCR). The rationale of the choice of BAT is presented in the BAT assessment submitted for the Environmental Permit application. The overall environmental performance of the SNCR option is considered to be more optimal as it has fewer cross media effects than SCR and, on its own, will meet the required BAT-AELs.	
AG00	**Agriculture** *Concerns were raised that pollutants from the Proposed Development would contaminate local produce*		

ID	Matter raised	Applicant Response	Where commitment is secured in the DCO (if applicable)
AG01	Pollutants do not degrade in the atmosphere and can become embedded in soil of farms. Due to strong winds this contamination can spread up to 10km.	The air quality assessment presented in **ES Chapter 8: Air Quality (Volume 6.2) [APP-035]** presents an assessment of potential metal deposition on land and concludes that the anticipated deposition levels are not significant. In addition**, ES Appendix 8B Air Quality Appendices, Annex G Human Health Risk Assessment) (Volume 6.4) [APP-078]** presents an assessment of potential impacts from bioaccumulation of dioxins and furans (PCDD/F) and dioxins like Polycyclic Biphenyls (PCBs) by considering the most plausible pathways of exposure for the individuals considered (farmer and resident). The HHRA demonstrated that exposure to dioxins, furans and dioxin-like PCBs is not significant.	
AG02	The smoke will come out of the chimneys and fall back down on farmland. The Walsoken Parish is down-wind and will be affected. The fruits and vegetables grown here are regularly tested for residue levels and traces of chemicals and contaminants. Farmers' livelihoods will be affected if the soil is damaged by pollutants.	It should be noted that the Proposed Development chimneys do not emit smoke. The air quality assessment in **ES Chapter 8: Air Quality (Volume 6.2) [APP-035]** presents an assessment of potential metal deposition on land, including the area of Walsoken Parish, and concludes that the anticipated deposition levels are not significant. In addition**, ES Appendix 8B Air Quality Appendices, Annex G Human Health Risk Assessment) (Volume 6.4) [APP-078]** presents an assessment of potential impacts from bioaccumulation of dioxins and furans (PCDD/F) and dioxins like Polycyclic Biphenyls (PCBs) by considering the most plausible pathways of exposure for the individuals considered (farmer and resident). Receptor FNE1 represents a farmer within Walsoken Parish. The	

ID	Matter raised	Applicant Response	Where commitment is secured in the DCO (if applicable)
		HHRA demonstrated that exposure to dioxins, furans and dioxin-like PCBs is not significant.	
PR00	**Proximity** *Concerns were raised about how close the Proposed Development would be to the local communities.*		
PR01	The pollutants from the Proposed Development would be blown into nearby streets and residential areas by strong winds.	The air quality assessment presented in **ES Chapter 8: Air Quality (Volume 6.2) [APP-035]**, includes the approach in identifying the Receptors that required consideration. The Receptors identified included the closest Receptors to the emissions sources (chimney and traffic), to ensure the impact on the local community was considered. In addition, the assessment of emissions to air considered 5 years of meteorological data to ensure all potential weather conditions are assessed, including occasions where there are strong winds. **ES Appendix 8B Chapter 8 Air Quality Appendices) (Volume 6.4) [APP-078]** provides a list of Receptors considered. These Receptors are also presented in **Figure 8.3: Modelled Receptor**, **Volume 6.3 ES Chapter 8 Air Quality Figures (Volume 6.3) [APP-052].** The assessment concluded that impacts from emissions to air are not significant.	
PR02	Pollutants from the Proposed Development would compound existing issues with dust and sand that is blown into the area.	The air quality assessment presented in **ES Chapter 8: Air Quality (Volume 6.2) [APP-035]** states that 5 years of meteorological data were used to ensure all potential weather conditions are assessed.	

ID	Matter raised	Applicant Response	Where commitment is secured in the DCO (if applicable)
		The assessment considered various sources when defining air quality baseline concentrations that included site specific air emissions monitoring (**ES Appendix 8B Chapter 8 Air Quality Appendices) (Volume 6.4) [APP-078]**). Therefore, in assessing potential impacts from the Proposed Development, suitable air quality baseline concentrations were applied to ensure that any existing elevated air pollutant concentrations were incorporated into the study.	
PR03	The free secondary school being built in Wisbech will be on the existing Thomas Clarkson site, exceptionally close to the incinerator. There will be hundreds of children at this school.	The air quality assessment presented in **ES Chapter 8: Air Quality (Volume 6.2) [APP-035]**, includes the approach in identifying the Receptors that required consideration. The Receptors identified included the closest Receptors to the emissions sources (chimney and traffic), to ensure the impact on the local community, including the closest schools, was considered. **ES Appendix 8B Chapter 8 Air Quality Appendices) (Volume 6.4) [APP-078]** provides a list of Receptors considered, including the Thomas Clarkson Academy. This receptor is also presented in **Figure 8.3: Modelled Receptor**, **Volume 6.3 ES Chapter 8 Air Quality Figures (Volume 6.3) [APP-052]**. Therefore, the assessment has considered potential impacts at the proposed secondary school and concludes them to be not significant.	
HM00	**Heavy metal emissions** *Concerns were raised about heavy metal emissions being released by the Proposed Development*		

ID	Matter raised	Applicant Response	Where commitment is secured in the DCO (if applicable)
HM01	It is inevitable that heavy metals will be added to the incinerator as part of the waste, and it is impossible that all the substances will be burnt at the optimal temperature. As a result, dioxins will be released and build up over time in the soil in the surrounding area. Even if filtration is carried out successfully, this will result in hazardous retained filtrate. Even if there is not any visible smoke, hazardous invisible pollution will be released.	To comply with the Industrial Emissions Directive (IED), the Proposed Development's furnace is required to ensure that the gases generated from the combustion of non-hazardous waste are raised to a temperature of 850°C for at least two seconds under the most unfavourable operating conditions. The combustion process will be carefully monitored and controlled to ensure combustion chamber temperature remains above 850°C, a residence time of 2 seconds is achieved at all times during normal operation, and that complete combustion is achieved. The Environmental Permit (EP) will define limits for Total Organic Carbon (TOC) in the bottom ash or Loss on Ignition (LOI) of the bottom ash along with sampling frequencies. Both TOC and LOI are measures of waste combustion efficiency. The Applicant will not exceed these limits and will comply with all requirements of the EP. The strictly controlled combustion chamber temperature and flue gas residence time will ensure that all residual organic compounds (including dioxins and furans) are oxidised and carbon monoxide is converted to carbon dioxide. Some reformation of dioxins will inevitably take place as the flue gas temperature reduces through the boiler but this is minimised through careful boiler design with sufficient flue gas velocity, rapid flue gas cooling and efficient cleaning systems to remove boiler deposits. Residual dioxins are captured in the air pollution control system and emission levels will be no higher than those defined in the EP. The air quality assessment in **ES Chapter 8: Air Quality (Volume 6.2) [APP-035]** presents an assessment of potential metal deposition on land and concludes that the anticipated deposition levels are not significant. The methodology applied considered guidance from the Environment Agency in assessing impacts from	

ID	Matter raised	Applicant Response	Where commitment is secured in the DCO (if applicable)
		metals to ensure robust assumptions are made in terms of anticipated metal emissions. In addition, **ES Appendix 8B Air Quality Appendices, Annex G Human Health Risk Assessment) (Volume 6.4) [APP-078]** presents an assessment of potential impacts from bioaccumulation of dioxins and furans (PCDD/F) and dioxin like Polycyclic Biphenyls (PCBs) by considering the most plausible pathways of exposure for the individuals considered (farmer and resident). The HHRA demonstrated that exposure to dioxins, furans and dioxin-like PCBs is not significant.	
HM02	The better the filtration system, the higher the number of small particulates and greater the proportion of metals released in the area.	In the Applicant's experience a higher quality filtration system results in higher numbers of fine particulates being captured within the air pollution control system and a lower proportion of metals released into the atmosphere. That is, properly designed activated carbon injection, coupled with high quality filter bags results in high efficiency air pollution control. This is evident in the low metal and particulate matter emissions recorded at the Applicant's operational facilities. The air quality assessment in **ES Chapter 8: Air Quality (Volume 6.2) [APP-035]** presents an assessment of potential metal deposition on land and concludes that the anticipated deposition levels are not significant. The methodology applied considered guidance from the Environment Agency in assessing impacts from metals to ensure robust assumptions are made in terms of anticipated metal emissions. The metal concentrations considered	

ID	Matter raised	Applicant Response	Where commitment is secured in the DCO (if applicable)
		represent worst case emissions, irrespective of the filtration system applied.	
HM03	The biggest concern is air quality and pollutants, including dioxins, heavy metals and acid rain.	Limits for emissions to air will be defined in the Environment Permit (EP) issued by the Environment Agency. In the Applicant's experience these limits will be no higher than those given in the Industrial Emission Directive which are based on Best Available Techniques (BAT). It is the Applicant's intention to use BAT for all air pollution control systems, and to fully comply with all requirements of the EP. All flue gases will be treated such that emissions from the Proposed Development will be no higher than the Emission Limit Values defined in the EP. The air quality assessment in **ES Chapter 8: Air Quality (Volume 6.2) [APP-035]** presents an assessment of potential impacts from emissions to air including dioxins and heavy metals. The assessment also considered impacts from acid deposition on all relevant ecological Receptors. The assessment concluded that impacts are not significant. **ES Appendix 8B Air Quality Appendices, Annex G Human Health Risk Assessment) (Volume 6.4) [APP-078]** presents an assessment of potential impacts from bioaccumulation of dioxins and furans (PCDD/F) and dioxin like Polycyclic Biphenyls (PCBs) by considering the most plausible pathways of exposure for the individuals considered (farmer and resident). The HHRA	

ID	Matter raised	Applicant Response	Where commitment is secured in the DCO (if applicable)
		demonstrated that exposure to dioxins, furans and dioxin-like PCBs is not significant.	

Table 2.3 Need

ID	Matter raised	Applicant Response	Where commitment is secured in the DCO (if applicable)
IL00	**Insufficient local demand for energy** *Concerns were raised that there is insufficient demand in the local area for the energy produced by the Proposed Development.*		
IL01	Demand for steam energy is decreasing in the Wisbech area.	**ES Chapter 2 Alternatives (Volume 6.2) [APP-029]** explains the reason for selecting the location of the Proposed Development. One of the Applicant's essential criteria for selecting the location for the Proposed Development was its close proximity to industrial users who have a heat/steam demand as evidenced by the Department for Business, Energy and Industrial Strategy (BEIS) UK CHP Development Map. To provide reassurance, the Applicant's **Combined Heat and Power Assessment (Volume 7.6) [APP-097]** has investigated the potential heat demands and concludes that there is sufficient potential demand to justify the supply of heat/steam in the	Requirement 23 (combined heat and power), Draft DCO (Volume 3.1) [APP-013].

ID	Matter raised	Applicant Response	Where commitment is secured in the DCO (if applicable)
		location chosen to site the EfW CHP Facility. The Applicant's continued commitment to deliver heat to commercial users is secured by **Requirement 23 (combined heat and power), Schedule 2, Draft DCO (Volume 3.1) [APP-013].**	
IL02	There is no need for this extra energy in Wisbech and the large food manufacturing businesses have stated they do not need it and have their own boilers. The power station by the River Nene sits abandoned after it went bust, and this will be the same.	The Proposed Development offers an opportunity for existing (and future) food manufacturing businesses to use steam created by the Proposed Development to replace their current reliance on natural gas (as fossil fuel) The Applicant cannot comment on the commercial situation of referenced power station. The Applicant has prepared a Funding Statement to demonstrate the Proposed Development can and will be corporately funded, see **Funding Statement (Volume 4.2) [APP-016]**.	
IL03	None of the local food manufacturing businesses want to buy the steam energy.	The Proposed Development is some time away from the commencement of operations and remains subject to achieving consent. Therefore, it is not unusual for developments, such as the Proposed Development, to not secure energy offtake contracts with local businesses until businesses can be satisfied that the supplier of energy will become operational. Continued commitment to develop the CHP network – secured by a DCO Requirement 23 Combined heat and power (**Draft DCO Volume 3.1 APP-013**) requires the Applicant to prepare a	DCO Requirement 23 Combined heat and power (Draft DCO Volume 3.1 APP-013)

ID	Matter raised	Applicant Response	Where commitment is secured in the DCO (if applicable)
		regular report setting out the actions that it is taking to secure the export of heat.	
IL04	The two largest food manufacturing businesses have responded in writing to WISWIN to state that they see no possibility of dealing with the Applicant and purchasing the energy.	See response to comment IL03	
RT00	**Recycling targets should be prioritised** *Concerns were raised that the need for incineration was no longer relevant, and that recycling targets should be prioritised.*		
RT01	Norfolk County Council's aims to reduce waste through recycling schemes minimise the need for incineration. They believe plastics should be reused rather than burnt.	In terms of the potential for the proposals to prejudice or detract from future recycling efforts, the focus of the **WFAA (Volume 7.3) [APP-094]** is on the availability of residual waste i.e., that part of the waste stream that is left over after reuse, recycling and other forms of recovery have taken place. It is therefore implicit in the **WFAA (Volume 7.3) [APP-094]** that the fraction of the household and commercial waste stream that is 'residual' is not able to be managed in any other way apart from incineration (with or without energy recovery) or landfill. Additionally, and importantly, the **WFAA (Volume 7.3) [APP-094]** provides a robust analysis of future residual waste management needs at both a localised and national level. The assessment includes consideration of future needs taking into account existing WPA recycling levels and the achievement of a range of recycling targets. Specifically, **Tables 5.3 and 5.4** in the **WFAA (Volume 7.3) [APP-094]** considers future recycling rates and Appendix D examines the collection arrangements of those	

ID	Matter raised	Applicant Response	Where commitment is secured in the DCO (if applicable)
		authorities in the Study Area to determine the extent to which future recycling aspirations could be achieved. In this regard, the **WFAA (Volume 7.3) [APP-094]** concludes that by 2030, it is predicted that even if the Government's ambitious combined recycling target of 65% for municipal and 'municipal like' commercial and industrial waste is realised, there would remain a minimum shortfall of ~2.8 million tonnes of residual HIC capacity in the UK (rising to over 6 million tonnes if the Government's recycling target is undershot by 5%). There is significant doubt on the achievability of this recycling target. In 2021, municipal waste recycling stood at 43.8% - a level which falls well below the achievement of the 2020 target of 50%. To achieve the Government's new, more stringent target of 65% by 2035, there needs to be an increase of over 21% in recycling in England over the next 14 years.	
RT02	Incinerators reduce recycling. 53% of waste in the residual waste stream could have been recycled.	In terms of the potential for the proposals to prejudice or detract from future recycling efforts, the focus of the **WFAA (Volume 7.3) [APP-094]** is on the availability of residual waste i.e., that part of the waste stream that is left over after reuse, recycling and other forms of recovery have taken place. It is therefore implicit in the **WFAA (Volume 7.3) [APP-094]** that the fraction of the household and commercial waste stream that is 'residual' is not able to be managed in any other way apart from incineration (with or without energy recovery) or landfill. Additionally, and importantly, the **WFAA (Volume 7.3) [APP-094]** is a robust analysis of future residual waste management	

ID	Matter raised	Applicant Response	Where commitment is secured in the DCO (if applicable)
		needs at both a localised and national level. The assessment includes consideration of future needs taking into account existing WPA recycling levels and the achievement of a range of recycling targets. In this regard, the **WFAA (Volume 7.3) [APP-094]** concludes that by 2030, it is predicted that even if the Government's ambitious combined recycling target of 65% for municipal and 'municipal like' commercial and industrial waste is realised, there would remain a minimum shortfall of ~2.8 million tonnes of residual HIC capacity in the UK (rising to over 6 million tonnes if the Government's recycling target is undershot by 5%). There is significant doubt on the achievability of this recycling target. In 2021, municipal waste recycling stood at 43.8% - a level which falls well below the achievement of the 2020 target of 50%. To achieve the Government's new, more stringent target of 65% by 2035, there needs to be an increase of over 21% in recycling in England over the next 14 years.	
SZ00	**Size** *Concerns were raised about the size of the Proposed Development*		
SZ01	The Proposed Development is larger than required.	The **WFAA (Volume 7.3) [APP-094]** provides a robust analysis of future residual waste management needs at both a localised and national level. The assessment includes consideration of future needs taking into account existing WPA recycling levels and the achievement of a range of recycling targets.	

ID	Matter raised	Applicant Response	Where commitment is secured in the DCO (if applicable)
		In this regard, the **WFAA (Volume 7.3) [APP-094]** concludes that by 2030, it is predicted that even if the Government's ambitious combined recycling target of 65% for municipal and 'municipal like' commercial and industrial waste is realised, there would remain a minimum shortfall of ~2.8 million tonnes of residual HIC capacity in the UK (rising to over 6 million tonnes if the Government's recycling target is undershot by 5%). There is significant doubt on the achievability of this recycling target. In 2021, municipal waste recycling stood at 43.8% - a level which falls well below the achievement of the 2020 target of 50%. To achieve the Government's new, more stringent target of 65% by 2035, there needs to be an increase of over 21% in recycling in England over the next 14 years.	
SZ02	A development of this size, twice as big as other MVV facilities, has only been designed so it holds NSIP status and can bypass local councils for the consent process.	The Proposed Development is accompanied by a robust assessment of the availability of fuel to power the facility – the **WFAA (Volume 7.3) [APP-094].** This clearly concludes that the Proposed Development could offer up to 625,600 tonnes per annum of much needed capacity that would contribute significantly to a local and national move away from a reliance on disposal to landfill. The amount of residual waste to be processed at the EfW CHP will generate in excess of 50 megawatts of electricity. Therefore, the Proposed Development is a Nationally Significant Infrastructure Project (NSIP) under Part 3 Section 14 of the Planning Act 2008 (2008 Act) by virtue of the fact that the generating station is located in England and has a generating capacity of over 50 megawatts (section 15(2) of the 2008 Act).	

ID	Matter raised	Applicant Response	Where commitment is secured in the DCO (if applicable)
		It, therefore, requires an application for a DCO to be submitted to the Planning Inspectorate (PINS) under the 2008 Act. However, in the event a DCO is issued for the Proposed Development, the relevant local planning authority(s) will oversee the discharge of the DCO Requirements, See Schedule 2 Requirements, **Draft DCO, (Volume 3.1) [APP-013].**	
SZ03	An Accompanied Site Inspection is suggested to the road from Littleport to Ely. This will demonstrate how much of an eyesore the Proposed Development will be on the landscape, as you can see Ely cathedral skyline from this viewpoint. The cold store is visible, but one bad decision doesn't mean more should be made.	The A10 between Littleport and Ely is over 22km from the Site and outside the 17km radius LVIA Study Area agreed with the statutory consultees within which there could be the theoretical potential for significant landscape or visual effects. The LVIA Study Area is illustrated in Figure 1 of **ES Chapter 9 Landscape and Visual Figures 9.1 to 9.14 (Volume 6.3) [APP-053**]. Even if visible, the Proposed Development would be located to the north of the A10 between Littleport and Ely and would be barely discernible. Furthermore, the Proposed Development could not be located in the same field of view as Ely Cathedral as that is to the southwest. Therefore, the Applicant does not consider an accompanied site visit to the road from Littleport to Ely is necessary, give it is beyond the LVIA Study Area, and would not inform any judgements on the extent of potentially significant landscape and visual effects.	
SZ04	We do not wish to see two huge steel structures in the view of the landscape.	The landscape and visual effects are reported in **ES Chapter 9 Landscape and Visual (Volume 6.2) [APP-036]** and **ES Chapter 9 Landscape and Visual Appendices (Volume 6.4) [APP-079].** The assessments are accompanied by visualisations in **ES Chapter 9 Landscape and Visual Figures**	

ID	Matter raised	Applicant Response	Where commitment is secured in the DCO (if applicable)
		9.17 to 9.24 (Volume 6.3) [APP-058] and **ES Chapter 9 Landscape and Visual Figures 9.25 to 9.32 (Volume 6.3) [APP-059]**, **ES Chapter 9 Landscape and Visual Figures 9.33 to 9.39 (Volume 6.3) [APP-060]** and **ES Chapter 9 Landscape and Visual Figures 9.40 to 9.46 (Volume 6.3) [APP-061]** illustrating what the Proposed Development would look like from 30 locations (agreed with the Local Authorities) at various directions and distances to the Site. The assessment concluded that whilst there would be some significant visual effects arising from the EfW CHP Facility, these would be restricted to some individual properties and localised parts of several recreational routes and highways, as reported in **Tables 9.14, 9.16, 9.17 and 9.18** of **ES Chapter 9 Landscape and Visual (Volume 6.2) [APP-036]**.	
SZ05	The chimney will be higher than Ely Cathedral, and located in the flat landscape of the Fens.	The maximum height of Ely Cathedral is 66m (the West Tower) with the Cathedral sited at an elevation of approximately 20m above ordnance datum (AOD). This increases the visual role of the Cathedral, elevating it above the low-lying surrounding landscape and tree cover. The chimneys of the Proposed Development would have a height of 90m (the worst-case scenario under the Limits of Deviation (LoD)) above an assumed base level of 3m AOD. The low level of the Proposed Development Site, and of that within the LVIA Study Area as shown in **Figure 9.7** of **ES Chapter 9 Landscape and Visual Figures 9.1 to 9.14 (Volume 6.3) [APP-053]**, means that built form and tree cover play an increased screening role. This is evidenced in the visualisations	

ID	Matter raised	Applicant Response	Where commitment is secured in the DCO (if applicable)
		presented in **ES Chapter 9 Landscape and Visual Figures 9.17 to 9.24 (Volume 6.3) [APP-058]**, **ES Chapter 9 Landscape and Visual Figures 9.25 to 9.32 (Volume 6.3) [APP-059]**, **ES Chapter 9 Landscape and Visual Figures 9.33 to 9.39 (Volume 6.3) [APP-060]** and **ES Chapter 9 Landscape and Visual Figures 9.40 to 9.46 (Volume 6.3) [APP-061]** illustrating what the Proposed Development would look like from 30 locations (agreed with the Local Authorities) at various directions and distances to the Site. Furthermore, Ely Cathedral is located in excess of 28km to the south of the Proposed Development and would remain a prominent landmark from the landscape around Ely, given its elevated position. As set out at paragraph 9.5.14 of **ES Chapter 9 Landscape and Visual (Volume 6.2) [APP-036]** other modern man-made vertical infrastructure, including wind farms, are already an established key characteristic on the flat landscape of the fens. Several wind farms are present throughout the Study Area including Ransonmoor Wind Farm which comprises five 107m high (to blade tip) turbines to the south-west of March. The Coldham/Coldham Extension and neighbouring Stag Holt Wind Farm comprise a total of 24 turbines with a maximum blade tip height of 100m, located to the north-east of March and ~6km to the south of the Site.	
SZ06	The scale of the Proposed Development is of great concern to residents. A landscape consultant has	The landscape and visual effects are reported in **ES Chapter 9 Landscape and Visual (Volume 6.2) [APP-036]** and **ES**	

ID	Matter raised	Applicant Response	Where commitment is secured in the DCO (if applicable)
	reviewed the application and confirmed it will have significant visual effects. It will be prominent from many vantage points.	**Chapter 9 Landscape and Visual Appendices (Volume 6.4) [APP-079].** The assessments are accompanied by visualisations in **ES Chapter 9 Landscape and Visual Figures 9.17 to 9.24 (Volume 6.3) [APP-058]** and **ES Chapter 9 Landscape and Visual Figures 9.25 to 9.32 (Volume 6.3) [APP-059]**, **ES Chapter 9 Landscape and Visual Figures 9.33 to 9.39 (Volume 6.3) [APP-060]** and **ES Chapter 9 Landscape and Visual Figures 9.40 to 9.46 (Volume 6.3) [APP-061]** illustrating what the Proposed Development would look like from 30 locations (agreed with the Local Authorities) at various directions and distances to the Site. The LVIA provides a detailed visual assessment from the 30 agreed viewpoints in **Appendix 9I** (**Volume 6.4 ES Chapter 9 Landscape and Visual Appendices [APP-079])** as well as a receptor led assessment for 89 visual Receptor groups in **Appendix 9J** (**Volume 6.4 ES Chapter 9 Landscape and Visual Appendices [APP-079]).** The assessment concluded that whilst there would be some significant visual effects arising from the EfW CHP Facility, these would be restricted to some individual properties and localised parts of several recreational routes and highways, as reported in **Tables 9.14, 9.16, 9.17 and 9.18** of **Volume 6.2 ES Chapter 9 Landscape and Visual [APP-036]**.	
SZ07	The Proposed Development will ruin the landscape; we have not yet seen a scale model so cannot fully understand the impact.	See response to comment SZ06	
SZ08	The project is too big and will be an eye sore.	See response to comment SZ06	

ID	Matter raised	Applicant Response	Where commitment is secured in the DCO (if applicable)
AL00	**Alternatives** *Concerns were raised that alternative locations had not been appropriately considered*		
AL01	The Applicant has not made robust arguments for the need in this area and has not considered other locations.	**Section 2.3.1 to 2.3.3 ES Chapter 2 Alternatives and ES Chapter 3 (Volume 6.2) [APP-030]** explains the Applicant's reason for selecting the location of the Proposed Development, highlighting the 'essential' and 'preferable' site selection criteria that were applied. In summary, the selection criteria included: • There is a need for additional residual waste treatment within the area; • In close proximity to existing business that have a large heat and/or power demand; • A site of a suitable size to accommodate the EfW CHP Facility; • Good access to the strategic road network; • A brownfield site allocated for waste management; and • A site free of environmental designations. One of the Applicant's essential criteria for selecting the location for the Proposed Development was its close proximity to industrial users who have a heat/steam demand as evidenced by the Department for Business, Energy and Industrial Strategy (BEIS) UK CHP Development Map. To provide reassurance, the Applicant's **Combined Heat and Power Assessment (Volume 7.6) [APP-097]** has investigated the potential heat demands and concludes that there is sufficient potential demand to justify the supply of heat/steam in the location chosen to site the EfW CHP Facility. The Applicant's continued commitment to deliver heat to commercial users is secured by **Requirement 23 (combined**	Requirement 23 (combined heat and power), Draft DCO (Volume 3.1) [APP-013].

ID	Matter raised	Applicant Response	Where commitment is secured in the DCO (if applicable)
		heat and power), Schedule 2, Draft DCO (Volume 3.1) [APP-013].	
AL02	The assessment of alternatives is narrowly conceived, with a failure to consider scale and the adoption of mixed waste sorting. The amount of waste to be burnt could be reduced using technology, such as that in Oslo, Friesland and the Netherlands. The Applicant has not done so in order to maximise the size of the facility to qualify as an NSIP.]	The EfW CHP Facility will be fed by suitable residual waste, which is waste that is left after any sorting and recycling has been completed. The Applicant is not a waste collection business and does not collect, haul or process waste. The implications arising from existing and future Government recycling targets, recycling and sorting initiatives, and measures to reduce residual waste such as separate food waste collections, Extended Producer Responsibility and Deposit Return Schemes have been accounted for within the **WFAA (Volume 7.3) [APP-094]**.	
AL03	Has the Applicant considered areas where the need for steam is higher?	One of the Applicant's essential criteria for selecting the location for the Proposed Development was its close proximity to industrial users who have a heat/steam demand as evidenced by the Department for Business, Energy and Industrial Strategy (BEIS) UK CHP Development Map. To provide reassurance, the Applicant's **Combined Heat and Power Assessment (Volume 7.6) [APP-097]** has investigated the potential heat demands and concludes that there is sufficient potential demand to justify the supply of heat/steam in the location chosen to site the EfW CHP Facility. The Applicant's continued commitment to deliver heat to commercial users is secured **by Requirement 23 (combined heat and power), Schedule 2, Draft DCO (Volume 3.1) [APP-013]**.	Requirement 23 (combined heat and power), Draft DCO (Volume 3.1) [APP-013].

ID	Matter raised	Applicant Response	Where commitment is secured in the DCO (if applicable)
AL04	The land [required for the Proposed Development] is needed for expansion of the area as the industrial estate is full. If built, it will decimate the industrial estate.	The Applicant considers that the Proposed Development would be complementary to existing and future local businesses in that it would be available to supply locally generated renewable heat and power. The majority of the site identified for the EfW CHP Facility is currently used as a waste management facility. The Applicant has considered the potential for the Proposed Development to affect other, future developments including local plan allocations. This assessment is reported within **ES Chapter: 18 Cumulative Effects (Volume 6.2) [APP-045]**. The conclusions are that effects with the potential to affect other, future development proposals, for example traffic, socio-economic, would be not significant.	
AL05	Defra removed the PFI for the EfW facility in Norfolk as it was not needed. It is inconceivable that the [Proposed Development] could be needed in this area, so close to where Defra deemed a facility was not needed.	Noted. However, contractual arrangements for managing residual waste are entirely separate to considerations around the need for additional capacity to manage such material. In 2019, Norfolk sent almost 95,000 tonnes of household, industrial and commercial waste to landfill (see **Table 4.4** of the **WFAA (Volume 7.3) [APP-094]**. In addition to this, Norfolk currently sends the remainder of its residual household waste to an energy recovery facility in Bedfordshire (Rookery South).	
AL06	The Applicant did not consider alternative sites, conduct the sequential test, and rural roads cannot take additional lorries.	On the matter of the sequential test, both at the time the EfW CHP Facility Site was first identified and at the point the option agreement for the land comprising the majority of the EfW CHP Facility Site was signed in 2019, the EfW CHP Facility Site was allocated in the Cambridgeshire and Peterborough Waste and Minerals Development Plan Site Specific Allocations 2012 as a Waste Allocation and Consultation Area (W1C inset map 39) as site allocation W1C (an allocation for waste recycling and	Requirement 11 (Construction traffic management plans), Requirement 12

ID	Matter raised	Applicant Response	Where commitment is secured in the DCO (if applicable)
		recovery facilities (non-landfill) under Policy SSP W1. In view of national policy set out in EN-1, Draft EN1, the National Planning Policy Framework and the Planning Practice Guidance Flood Risk and Coastal Change there was no requirement upon the Applicant to undertake a sequential test at the time it selected the site, nor through the stages of scoping and period of non-statutory consultation (at which times it still comprised an allocation). In July 2021 (after the commencement of the statutory consultation period for the Proposed Development) the Development Plan was replaced by Cambridgeshire and Peterborough Minerals and Waste Local Plan 2021. This Plan does not allocate sites for waste management purposes instead identifying waste management areas (Policy 10 WMAs). WMAs are existing or committed waste management sites. The EfW CHP Facility Site is identified as a WMA 'existing or committed waste management facility' in the 2021 Minerals and Waste Local Plan and retained within the Fenland Local Plan 2014 as an allocated waste management site. Following the adoption of the Cambridgeshire and Peterborough Minerals and Waste Local Plan 2021, and taking into account feedback received during statutory consultation, the Applicant re-evaluated its site selection process. As part of this re-evaluation, the Applicant undertook a sequential test which considered other WMAs in the Wisbech area (as set out in the **Flood Risk Assessment (Appendix 12A FRA Volume 6.4 [APP-084]).** The Applicant did not include any other sites outside of the Wisbech area within this assessment as it was not aware of (and has not since been made aware of) any potential site that met its essential criteria for an EfW CHP facility. Please	(Operational traffic management plan) Draft DCO (Volume 3.1) [APP-013].

ID	Matter raised	Applicant Response	Where commitment is secured in the DCO (if applicable)
		refer to response AL01 for details of the Applicant's essential criteria. The Applicant did not identify any other available sites that met its essential site selection criteria, in particular the availability of potential CHP users, and that were located in either Flood Zone 1 or 2. With regard to rural roads, the Applicant has set out the route restrictions that it will require HGVs accessing the site to comply with. The Outline CTMP (**ES Chapter 6 Traffic and Transport Appendix 6A Outline Construction Traffic Management Plan Volume 6.4 APP-72**) and **Outline OTMP** (**Outline Operational Traffic Management Plan Volume 7.15 APP-106**) updated for Deadline 1 identify the routes that vehicles should take to access the site and those that they should avoid. The emphasis is upon the use of the A47 and avoidance of rural roads.	
AL07	The siting criteria leading to Wisbech relies on proximity to CHP. However commercial operators requiring steam have confirmed they will not deal with MVV. There are no opportunities for steam to be sold.	It is acknowledged that one of the Applicant's essential criteria for selecting the location for the Proposed Development was its close proximity to industrial users who have a heat/steam demand as evidenced by the Department for Business, Energy and Industrial Strategy (BEIS) UK CHP Development Map. To provide reassurance, the Applicant's **Combined Heat and Power Assessment (Volume 7.6) [APP-097]** has investigated the potential heat demands and concludes that there is sufficient potential demand to justify the supply of heat/steam in the location chosen to site the EfW CHP Facility. The Applicant's continued commitment to deliver heat to commercial users is	

ID	Matter raised	Applicant Response	Where commitment is secured in the DCO (if applicable)
		secured by Requirement 23 **(combined heat and power), Schedule 2, Draft DCO (Volume 3.1) [APP-013].**	

Table 2.4 Local Economy

ID	Matter raised	Applicant Response	Where commitment is secured in the DCO (if applicable)
LE00	**Area of deprivation** *Concerns were raised about the decision to locate the Proposed Development in an already deprived area*		
LE01	The negative health effects of the Proposed Development will be masked by existing health issues in the area.	To inform the Environmental Statement (ES), the Applicant consulted Public Health England (PHE) (now UK Health Security Agency). PHE confirmed in its response dated 17 August 2021 that: *"…Regarding emissions to air from municipal energy from waste developments, PHE has reviewed published research to examine the suggested links between emissions from municipal waste incinerators and effects on health. PHE's risk assessment remains that modern, well run and regulated municipal waste*	Requirements 10, 11, 12, 15, 16, 17, 22 to the Draft DCO (Volume 3.1) [APP-013].

ID	Matter raised	Applicant Response	Where commitment is secured in the DCO (if applicable)
		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..." The environmental impacts of the Proposed Development including those that could affect local residents from traffic, such as, health and wellbeing, have been assessed and reported in the **ES (Volume 6.2). ES Chapter 16 Health (Volume 6.2) [APP-043]** assesses the combination of impacts reported in the ES, to provide an indication of impacts on health and wellbeing. With mitigation in place, to be secured by either a DCO Requirement or under the Environmental Permit, there are no residual significant effects. Measures to be implemented include: • Construction Environmental Management Plan (CEMP). Includes a range of mitigation measures including a requirement for community liaison and to register the Proposed Development with the Considerate Contractors Scheme – secured by Requirement 10, **Draft DCO (Volume 3.1) [APP-013];** • For the operational phase of the Proposed Development, the Applicant will employ a Community Liaison Manager to engage and raise awareness within the community of the Proposed Development – secured by Requirement 22, **Draft DCO (Volume 3.1) [APP-013];** • Odour Management Plan – secured by Requirement 16, **Draft DCO (Volume 3.1) [APP-013];** • Fire Prevention Plan – secured by Requirement 17, **Draft DCO (Volume 3.1) [APP-013];**	

ID	Matter raised	Applicant Response	Where commitment is secured in the DCO (if applicable)
		• Construction Staff Travel Plan – secured by Requirement 10, **Draft DCO (Volume 3.1) [APP-013];** • Construction Traffic Management Plan (CTMP) – secured by Requirement 11, **Draft DCO (Volume 3.1) [APP-013];** • Operational Traffic Management Plan (OTMP) including route restrictions to reduce impacts to Wisbech Town and surrounding villages. – secured by Requirement 12, **Draft DCO (Volume 3.1) [APP-013];** • Operational Travel Plan – secured by Requirement 15, **Draft DCO (Volume 3.1) [APP-013];** and • Securing an Environmental Permit to ensure the EfW CHP Facility operates safely and emissions are monitored to industry standards.	
LE02	Queried whether the area had been chosen because of existing poor health outcomes.	The reason for identifying the site for the Proposed Development is set out within **ES Chapter 2 Alternatives (Volume 6.2) [APP-029]**. It explains the 'essential' and 'preferable' site selection criteria that were applied . In summary, the selection criteria included: • There is a need for additional residual waste treatment within the area; • In close proximity to existing business that have a large heat and/or power demand; • A site of a suitable size to accommodate the EfW CHP Facility; • Good access to the strategic road network; • A brownfield site allocated for waste management; and • A site free of environmental designations.	

ID	Matter raised	Applicant Response	Where commitment is secured in the DCO (if applicable)
		Please also refer to the response to LE01 in respect of health impacts and the mitigation requirements to ensure there will be no residual significant effects.	
LE03	Local people are feeling like Wisbech is a dumping ground. It is insulting to Joseph Medworth for the Applicant to name themselves after him.	The EfW CHP Facility Site is located in the Medworth ward of Wisbech, hence the Applicant's company name is Medworth CHP Limited.	
LE04	Wisbech has faced many challenges, and although the people are resilient, proposals like this make it very hard for local people to fight, especially when the views of local councils are being ignored.	The Applicant has sought to engage with the relevant host authorities, national and local stakeholders, local residents and businesses. Its approach to consultation was agreed with the relevant host authorities and undertaken consistent with its Statement of Community Consultation. All representations received at non-statutory and statutory consultation were considered and amendments made to the Proposed Development where the Applicant considered it appropriate to do so. **The Consultation Report (Volume 5.1 [APP-018-023]** explains the consultation process and the ways in which it informed the design of the project. Every effort has been made to engage specifically with Fenland District Council to establish appropriate community benefits, should the Proposed Development be granted consent. However, the council unanimously passed a motion to oppose the planned waste incinerator, in whatever legal way necessary at a meeting in February 2020.	
LE05	The socio-economic impact of incinerators is masked in areas of deprivation.	The Applicant has undertaken a socio-economic assessment which is reported within ES **Chapter 15 Socio-economics,**	

ID	Matter raised	Applicant Response	Where commitment is secured in the DCO (if applicable)
		Tourism, Recreation and Land Use (Volume 6.2) [APP-042]. This considers the effects of the Proposed Development in the context of existing baseline conditions in order to understand the extent to which effects could be significant. Significant positive effects are identified in terms of local job creation and local supply chain during construction. This conclusion is reached based upon the magnitude of the opportunity created as opposed to the existing levels of deprivation.	
LE06	Discrimination lies at the core of this application.	The Applicant has sought to engage with the relevant host authorities, national and local stakeholders, local residents and businesses in order to develop an inclusive approach to consultation. Its approach was agreed with the relevant host authorities and undertaken consistent with its Statement of Community Consultation and included a range of solutions for people requiring additional assistance. These included making the consultation documents available in large copy print, audio, or Braille on request. A translation service to provide documents in alternative languages was also available on request. All representations received at non-statutory and statutory consultation were considered and amendments made to the Proposed Development where the Applicant considered it appropriate to do so. **The Consultation Report (Volume 5.1 [APP-018-023]** explains the consultation process and the ways in which it informed the design of the project including how the Applicant sought to access 'hard to reach' groups. The Applicant is committed to supporting local communities during the construction and operation of the Proposed Development. It has prepared an **Outline Employment and**	Requirement 21 of the Draft DCO (Volume 3.1) [APP-013] Requirement 22 of the Draft DCO (Volume 3.1) [APP-013]

ID	Matter raised	Applicant Response	Where commitment is secured in the DCO (if applicable)
		Skills Strategy (Volume 7.8) [APP-099] secured by Requirement 21 of the **Draft DCO (Volume 3.1) [APP-013].** It is also proposing to implement an **Outline Community Benefits Strategy (Volume 7.14) [APP-105]** which sets out the benefits it will be looking to deliver. To ensure proper engagement with the local community the Applicant will employ a Community Liaison Manager, a commitment secured by Requirement 22 of the **Draft DCO (Volume 3.1) [APP-013].**	
LE07	The local area needs improved education for young people, not a Development like this.	The Proposed Development will offer opportunities for young people to engage in educational activities relating to waste management, wider sustainability issues, engineering and wider STEM subjects. The Applicant will employ a full-time Community Liaison Manager (Requirement 22 of the **Draft DCO (Volume 3.1) [APP-013])** from the local area to deliver visits to the facility, work experience opportunities, internships and apprenticeships. The DCO application documents include **Outline Employment and Skills Strategy (Volume 7.8) [APP-099]** secured by Requirement 21 of the **Draft DCO (Volume 3.1) [APP-013]** and the **Outline Community Benefits Strategy (Volume 7.14) [APP-105]**.	Requirement 21 of the Draft DCO (Volume 3.1) [APP-013] Requirement 22 of the Draft DCO (Volume 3.1) [APP-013]
LE08	Wisbech is a rural Georgian town with lots of history, but also extreme deprivation. With severe job losses, Wisbech has a fragile economy that will not be helped by this Development.	The Applicant has undertaken a socio-economic assessment which is reported within **ES Chapter 15 Socio-economics, Tourism, Recreation and Land Use (Volume 6.2) [APP-042]**. This considers the effects of the Proposed Development in the context of existing baseline conditions in order to understand the extent to which effects could be significant. Significant positive effects are identified in terms of local job creation and local supply chain during construction.	Requirement 21 Employment and skills strategy (Draft DCO Volume 3.1) [APP-013]

ID	Matter raised	Applicant Response	Where commitment is secured in the DCO (if applicable)
		The Applicant is committed to working with the local community to deliver local employment, an approach undertaken at MVV's other UK facilities. These benefits are set out in the **Outline Employment and Skills Strategy (Volume 7.8) [APP-099]** which has been developed in consultation with Norfolk County Council and includes the following proposals: • A waste education programme and support for higher and further education establishments, including STEM support; and • Apprenticeships, Internships and work experience/placements. • Local employment during construction and operation; and • Support the local supply chain. The final version of the Employment and Skills Strategy is secured by Requirement 21, Schedule 2, **Draft DCO (Volume 3.1) [APP-013].**	
LE09	Wisbech are not an easy target.	See response to L06 above.	
LE10	The town needs people to visit and use the amenities, this development will negatively impact how the town is perceived. An equality impact assessment must be carried out to understand how this will be affected.	The Applicant has prepared **ES Chapter 15 Socio-economics, Tourism, Recreation and Land Use (Volume 6.2) [APP-042].** This considers the effects of the Proposed Development in relation to its potential to affect tourism. In preparing the document, the Secretary of State within its Scoping Opinion agreed 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	

ID	Matter raised	Applicant Response	Where commitment is secured in the DCO (if applicable)
		recreational facilities are located within or in close proximity to it. With regard to indirect effects the assessment concludes that these would be not significant.	
LE11	Property values will be slashed.	House prices are driven by a range of factors and it is considered generally that the Proposed Development would not by itself decrease house prices. For a limited number of properties that may be affected by physical factors (such as noise) during the operation of the Proposed Development, and such factors result in a diminution in value, a claim for compensation can be made under Part 1 of the Land Compensation Act 1973.	
LE12	Concern about how much potable water the Development would use, which would further deprive the area	As detailed in **Chapter 12: Hydrology (Volume 6.2 of the Environmental Statement (ES)) [APP-039]**, the potable water demand for the EfW Facility appears high because it allows for the full CHP steam supply with zero condensate return as a worst-case scenario. In practice, there is limited demand for reuse of surface water runoff in the process (which would also need pre-treatment). For the wider development, reuse of water and provision of rainwater harvesting systems will be provided where practicable (e.g. permeable paving in car park and area surrounding switch compound, rainwater harvesting and green roof for weighbridge, reuse of runoff from office building). Matters concerning potable water supply for the Proposed Development are being progressed by the Applicant and	

ID	Matter raised	Applicant Response	Where commitment is secured in the DCO (if applicable)
		Anglian Water. These discussions include considering any additional demands the Proposed Development may place on local water resources. Submitted at Deadline 1, the **Statement of Common Ground between Medworth CHP Limited and Anglian Water (Volume 9.10)**, summarises progress on this matter.	
AT00	**Attraction of professionals** *Concerns were raised that the Proposed Development would impact the willingness of professionals to live and work in the surrounding area*		
AT01	Doctors will not want to work in towns like Wisbech if they are located near to an incinerator.	The Applicant has undertaken consultation with the East of England Ambulance Service (EEAST) and its partner, the Cambridgeshire and Peterborough Integrated Care System (CPICS). CPICS is a partnership between organisations that meet health and care needs across Cambridgeshire and Peterborough. CPICS has not raised a concern that the Proposed Development may make the recruitment of doctors into Wisbech difficult.	
AT02	NHS GP practices in the area are already understaffed due to significant multiple deprivation. Consent for this development will make it even more difficult to attract GPs. West Norfolk GPs expressed concerns about incineration in their area a few years ago, the same will happen here with doctors, teachers, business owners, etc.	The Applicant has consulted with the relevant host authorities and Public Health England when formulating its application. **ES Chapter 16 Health (Volume 6.2) [APP-043]** reports upon the consultation held during non-statutory and statutory rounds of consultation and provide a baseline profile of existing health services. It concludes that effects arising from the construction and operation of the Proposed Development would not have a significant effect upon health or upon health services.	

ID	Matter raised	Applicant Response	Where commitment is secured in the DCO (if applicable)
		Subsequent to the submission of the application the Applicant has consulted with EEAST and CPICS as well as the UK Health Security Agency. The Applicant is in the process of agreeing Statements of Common Ground with East of England Ambulance Trust (Volume 9.11) and the UK Health Security Agency (Volume 9.8)	
AT03	Perception is crucial, and people will not come to live somewhere that they perceive as having a bad environment.	The Proposed Development will not lead to poorer environmental conditions as evidenced by the findings of the Environmental Statement. Whilst it is recognised that there will be a small number of negative significant effects the Applicant has put in place embedded and additional mitigation measures to ensure that these are reduced as far as practicable. The Proposed Development will also generate positive environmental effects and again, the Applicant proposes to maximise and secure these through measures such as the **Outline Employment and Skills Strategy (Volume 7.8) [APPP-099]** and **Outline Community Benefits Strategy (Volume 7.14) [APP-0106]**.	Requirement 21 Draft DCO (Volume 3.1) [APP-013]
AT04	Doctors will not come to Wisbech if this is built in such close proximity to schools.	See response to AT01 above.	
RE00	**Risk to existing development proposals** *Concerns were raised about the influence this could have on existing development proposals in the local area*		
RE01	The plan for Wisbech Rail will be put at risk if the Proposed Development is granted consent. The rail is needed for the development of the town.	The Applicant supports the reopening of the March to Wisbech railway and the wider benefits this would bring to local community. Whilst there are currently no firm plans for its	

ID	Matter raised	Applicant Response	Where commitment is secured in the DCO (if applicable)
		reopening, the Applicant has been in discussion with Network Rail to ensure both the Proposed Development and reopening of the railway can proceed without compromising one another. The Applicant has set aside land within the EfW CHP Facility Site to accommodate a potential future rail unloading area and, should it be required, land for a road bridge embankment. paragraphs 2.3.10 to 2.3.17, **ES Chapter 2: Alternatives (Volume 6.2) [APP-029]** and paragraphs 3.4.82 to 3.4.86, **ES Chapter 3: Description of the Proposed Development (Volume 6.2) [APP-030]** provide further details. For further details of the Applicant's engagement with Network Rail see **the Statement of Common Ground between Medworth CHP Limited and Network Rail (Volume 8.2) [PDA-002].**	
RE02	The proposed site is needed for the expansion of the local industrial area instead.	The majority of the site identified for the Proposed Development is shown within the Cambridgeshire and Peterborough Minerals Waste Local Plan 2021 as a Waste Management Area. Local Plan Policy 10 recognises the importance of such areas in managing the waste stream and it seeks to ensure that waste management operations are not compromised by other forms of development nearby. Proposals to expand the local industrial area onto the site would therefore not be permitted unless it could be demonstrated that they could comply with the criteria set out within this policy.	
RE03	The proposed rail line into Wisbech will not be possible if this consent is granted.	See response RE01	

ID	Matter raised	Applicant Response	Where commitment is secured in the DCO (if applicable)
RE04	Consent must not prejudice the proposed rail or road schemes, and associated road improvements must be secured by a s278 agreement.	See response RE01 for the Applicant's consideration of the proposal to reopen the March to Wisbech Railway. With regard to proposed road improvements, the Access Improvements for New Bridge Lane have been designed to be consistent with CCC's proposals for the Wisbech Access Strategy. Elsewhere the Proposed Development has been designed to be consistent with proposals to upgrade the Elm High Road/A47 and Broadend Road/A47 junctions such that the Grid Connection's alignment has been informed by CCC's designs for these junctions. The Grid Connection will also be laid at a suitable depth at each junction.	
RE05	The Development will discourage current and future businesses from investing in the area, which ultimately won't help with the youth unemployment crisis.	The Applicant has undertaken a socio-economic assessment which is reported within **ES Chapter 15 Socio-economics, Tourism, Recreation and Land Use (Volume 6.2) [APP-042]**. This considers the effects of the Proposed Development in the context of existing baseline conditions in order to understand the extent to which effects could be significant. Significant positive effects are identified in terms of local job creation and local supply chain during construction. To support delivery of these benefits the Applicant has produced an **Outline Employment and Skills Strategy (Volume 7.8) [APP-099]** secured by DCO Requirement 21 **Schedule 2, Draft DCO (Volume 3.1) [APP-013]**. This strategy includes for the Applicant's support in the training and education of young people and was prepared in consultation with Norfolk County Council.	Requirement 21 Draft DCO (Volume 3.1) [APP-013]
AW00	**Algores Way**		

ID	Matter raised	Applicant Response	Where commitment is secured in the DCO (if applicable)
	Concerns were raised by business owners on Algores Way regarding the impact the Proposed Development would have on their businesses		
AW01	There are over 400 people are employed on Algores Way and Europa Way, which is far more jobs than those proposed by the Development. These individuals cannot afford the disruption caused by construction for four years.	The Applicant has updated the **Outline CEMP and the Outline CTMP (Volume 7.12 and 6.4 respectively)** at **Sections 3.5 and 7.4** respectively to reaffirm liaison with local businesses during construction and to ensure access to their businesses are maintained. The existing, consented operations at the site identified for the EfW CHP Facility access via Algores Way. Existing, permitted HGV movements based upon the permitted levels of waste the existing facility handles indicate that, in 33 of the 36 construction months, HGV/LGV movements would be lower than the current permitted. During operation, routing restrictions set out within the **Outline Operational Traffic Management Plan (Volume 7.15) [APP-106]** mean that no HGVs serving the EfW CHP Facility would use Algores Way. The Applicant's calculations are set out within the Algores Way Technical Note which is appended to the **Applicant's response to relevant representations (Volume 9.2)** and is submitted at Deadline 1.	Requirements 11, 12 and 21 Draft DCO (Volume 3.1) [APP-013]
AW02	Customers at Hairworld UK require easy access to the premises due to their condition. They may also be uncomfortable visiting a location adjacent to an incinerator due to air quality impacts. The landowner sought clarification as to whether this access will be affected, and if it will not, requested that compulsory acquisition powers not be exercised.	See response to AW01 above. The Applicant has also issued a letter to businesses along Algores Way to confirm that since receiving written confirmation from CCC (to be confirmed at Deadline 1) it does not wish to adopt Algores Way as a public highway the Applicant has updated the **Book of Reference (Volume 4.1)** and associated	

ID	Matter raised	Applicant Response	Where commitment is secured in the DCO (if applicable)
		Land Plans (Volume 2.2) to reflect this position, confirming that as Algores Way shall remain a private road in the ownership of Fenland District Council. The powers the Applicant shall seek under the DCO will ensure they benefit from a right of access to and from the EfW CHP Facility and powers to undertake the construction works along Algores Way only. The Applicant is not seeking any rights of access over land owned by businesses fronting Algores Way nor is it seeking to remove their existing rights of access.	
AW03	Family business on Algores Way which requires 24-hour access and an average of 30 vehicles visiting daily. Delays to business because of road closure are unacceptable, especially given the financial climate. They require clarification on the proposed compulsory acquisition and assurance that 24 hour access will be possible.	See responses to AW01 and AW02	
AW04	Fear of blockages to bramley apple business who need access to the site 24 hours a day, 7 days a week. Blocked access for supplies and deliveries will create issues for their business and feeding the community.	See responses to AW01 and AW02	
AW05	Many businesses on Algores Way will have to close because of the disruption.	See responses to AW01 and AW02	

ID	Matter raised	Applicant Response	Where commitment is secured in the DCO (if applicable)
LJ00	**Local Jobs** *Concerns were raised as to whether the Proposed Development would create jobs for local people as indicated by the Applicant*		
LJ01	The jobs created will only be relevant during construction, after which the development will only be manned by minimal staff.	**ES Chapter 3: Description of the Proposed Development (Volume 6.2) [APP-030]** describes the number of jobs created at construction and at operation. The Applicant does recognise that the number of operational jobs employed directly at the EfW CHP Facility will be substantially less than during its construction. However, the 40 jobs created will be supplemented by a number of indirect jobs. Section 15.9.74, **ES Chapter 15: Socio-economics, Tourism, Recreation and Land use (Volume 6.2) [APP-042]** calculates that an additional 24 rising to 32 jobs could be generated indirectly at the local (Fenland District and Borough of King's Lynn and West Norfolk) and County level respectively. These jobs could be created as a result of contracts placed by the Applicant for services such as cleaning and catering services, pest control, landscaping services, electrical engineering services, mechanical engineering services and other maintenance-related roles such as scaffolding and rescue teams. Furthermore, the wage expenditure of workers employed directly at the Proposed Development, as well as those employed in local businesses in the supply chain, would also support induced employment in shops, services, and other businesses in the local economy.	
LJ02	Wisbech does not have the hotels to support the number of visitors the Applicant suggests will visit. This will not support the local economy as they suggest it will.	The Applicant assumes that reference is being made to the accommodation of the construction workforce. **ES Chapter 15 Socio-economics, Tourism, Recreation and Land use (Volume 6.2) [APP-042]** assesses the potential for effects arising as a result of the arrival of the construction workforce. It	Requirement 21 Employment and skills strategy Draft

ID	Matter raised	Applicant Response	Where commitment is secured in the DCO (if applicable)
		notes that whilst up to 700 could be employed constructing the Proposed Development that the maximum on site at any one time would be approximately 500. Furthermore, the nature of construction activities is that many employees will be on site for specific tasks which means that they are unlikely to stay in the area for the majority of the 36 month construction programme. The Applicant proposes to encourage the use of existing, local contractors wherever possible, thereby reducing demand for accommodation. The **Outline Employment and Skills Strategy (Volume 7.8) [APP-099]** set out the measures which the Applicant will take to encourage a local supply chain and to support skills development in the local area. The Strategy has been prepared in consultation with Norfolk County Council. Employees who are looking for short-stay accommodation will be supported by the Applicant. **ES Chapter 15 Socio-economics, Tourism, Recreation and Land use (Volume 6.2) [APP-042]** states that the Applicant will prepare documentation which would include contacts for local accommodation and details of accommodation would be advertised on site.	DCO (Volume 3.1) [APPP-013].
LJ03	The Applicant's attempt to support the community is a drop in the ocean compared to the negative impact of the Proposed Development on the local economy.	**ES Chapter 3 Description of the Proposed Development (Volume 6.2) [APP-030]** describes the number of jobs created at construction and at operation. During both construction and operation, the number of jobs directly created will be supplemented by additional, indirect jobs. **ES Chapter 15 Socio-economics, Tourism, Recreation and Land use (Volume 6.2) [APP-042]** calculates that an additional 777 jobs would be generated indirectly during construction and 24 rising to 32 jobs could be generated indirectly at the local (Fenland District and Borough of King's Lynn and West Norfolk) and County level respectively during operation. Furthermore, the	Requirement 21 Employment and skills strategy Requirement 22 Community liaison manager

ID	Matter raised	Applicant Response	Where commitment is secured in the DCO (if applicable)
		wage expenditure of workers employed during the construction and operation of the Proposed Development, as well as those employed in local businesses in the supply chain, would also support induced employment in shops, services, and other businesses in the local economy. In order to maximise local employment opportunities the Applicant has prepared an **Outline Employment and Skills Strategy (Volume 7.8) [APP-099]** that sets out the measures which the Applicant will take to encourage a local supply chain and to support skills development in the local area. The Strategy has been prepared in consultation with Norfolk County Council. Wider community support will be provided via the Applicant's Community Liaison Manager implementing the **Outline Community Benefits Strategy (Volume 7.14) [APP-105].**	Draft DCO (Volume 3.1) [APPP-013].
LJ04	The Proposed Development will not create jobs for local people, instead the work will need to be outsourced due to unavailability of contractors locally.	**ES Chapter 3 Description of the Proposed Development (Volume 6.2) [APP-030]** describes the number of jobs created at construction and at operation. During both construction and operation, the number of jobs directly created (700 and 40 respectively) will be supplemented by additional, indirect jobs. **ES Chapter 15 Socio-economics, Tourism, Recreation and Land use (Volume 6.2) [APP-042]** calculates that an additional 777 jobs would be generated indirectly during construction and 24 rising to 32 jobs could be generated indirectly at the local (Fenland District and Borough of King's Lynn and West Norfolk) and County level respectively during operation. Furthermore, the wage expenditure of workers employed during the construction and operation of the Proposed Development, as well as those employed in local businesses in the supply chain,	Requirement 21 Employment and skills strategy Draft DCO (Volume 3.1) [APPP-013].

ID	Matter raised	Applicant Response	Where commitment is secured in the DCO (if applicable)
		would also support induced employment in shops, services, and other businesses in the local economy. In order to maximise local employment opportunities the Applicant has prepared an **Outline Employment and Skills Strategy (Volume 7.8) [APP-099]** that sets out the measures which the Applicant will take to encourage a local supply chain and to support skills development in the local area, including apprenticeships. The Strategy has been prepared in consultation with Norfolk County Council.	
LJ05	Scepticism that the Applicant would hire local people, instead they expect that the work will be brought in, and Wisbech has no hospitality sector to benefit. The creation of a few jobs would not be worth the price paid.	See response to LJ04 above.	Requirement 21 Employment and skills strategy Draft DCO (Volume 3.1) [APPP-013].
LJ06	Even if jobs are offered, more will be lost as a result of the Development.	See response to LJ04 above in the context of the number of direct and indirect jobs created and the Applicant's commitment to the **Outline Employment and Skills Strategy (Volume 7.8) [APP-099].**	Requirement 21 Employment and skills strategy Draft DCO (Volume 3.1) [APPP-013].

Table 2.5 Environmental Impacts

ID	Matter raised	Applicant Response	Where commitment is secured in the DCO (if applicable)
LW00	**Local Wildlife** *Concerns were raised about the harm the Proposed Development could cause to local wildlife.*		
LW01	Nearby Sites of Special Scientific Interest (SSSIs) will be harmed by the pollutants.	The 5km radius for the zone of influence for national sites was presented by the Applicant within its EIA Scoping Report (December 2019). There are no SSSIs within 5km of the Proposed Development which the Applicant has identified as an appropriate zone of influence. **ES Chapter 11: Biodiversity Rev 2 (Volume 6.2) [AS-008]** considers a wide range of ecological Receptors which together make up the natural environment and it identifies the extent to which significant effects may occur. International and local ecological Receptors have been assessed within the biodiversity assessment and include: • Nene Wash Special Area of Conservation (SAC) Special Protection Area (SPA) and Ramsar; • Ouse Wash SAC, SPA, and Ramsar; and • River Nene County Wildlife Site (CWS). The potential for pollutants to affect these site is assessed within **ES Chapter 12 Hydrology (Volume 6.2) [APP-039]** with regard to water pollution and **within ES Chapter 8 Air Quality (Volume 6.2) [APP-035]** concerning air pollution. Both assessments conclude that with mitigation in place effects would not be significant. Mitigation would be delivered through a suite of management documents which include the **Outline**	Requirement 5, Landscape and Ecology Management Plan, Requirement 6 Biodiversity net gain Requirement 10 CEMP Draft DCP (Volume 3.1) [APP-013]

ID	Matter raised	Applicant Response	Where commitment is secured in the DCO (if applicable)
		Construction Environmental Management Plan (Volume 7.12) [APP-103], and for operation, the Proposed Development would need to operate within the parameters set by the Environmental Permit. The Applicant is committed to supporting local biodiversity. **Figure 3.14: Outline Landscape and Ecology Management Strategy (Volume 6.3) [APP-049]** includes features designed to maintain and enhance ecological connectivity in line with the Natural Habitat Network and local strategies and provide refugia and foraging habitats targeted to species found in the locality. **The Outline Landscape and Ecology Management Plan (Volume 7.7) [APP-098]** illustrates the locations of the proposed native planting that will be provided within the operational EfW CHP Facility Site. This landscape planting will include native shrub mix; native hedgerow with trees; native wet woodland, native species rich grassland, brown roof, and green walls. The full details of the final scheme will be based on the Outline Landscape and Ecology Strategy and secured by **Requirement 5, Schedule 2, Draft DCP (Volume 3.1) [APP-013]**. The Proposed Development will deliver Biodiversity Net Gain (BNG) and the biodiversity and landscape planting following the completion of the construction period will be subject to a 30-year maintenance period, the first five of which will ensure establishment of the planting. The Applicant has set out the options it will consider to deliver BNG within **Appendix 11M (Volume 6.4) [AS-009].**	

ID	Matter raised	Applicant Response	Where commitment is secured in the DCO (if applicable)
LW02	The area is known for its soft fruits, which are very sensitive to pollution. The local celery also has PGI status from DEFRA and will be impacted.	**ES Chapter 8 Air Quality** includes within **Appendix 8B a Human Health Risk Assessment (Annex H) (Volume 6.4) [APP-078].** The assessment presented considers the potential impact of substances released by the EfW CHP Facility Site on the health of the local population at the point of maximum exposure. It states that the exposure scenarios used represent highly unrealistic situations in which all exposure assumptions are chosen to represent a worst-case and should be treated as an extreme view of the risks to health. They are considered to be an extreme upper theoretical representation of exposure that would be over and above that which would actually be experienced by the real population in the locality. The assessment considers the potential for effects upon residents and upon farmers. For the farmer it assumes as a worst-case that these Receptors are located at the closest farming area to the EfW CHP Facility and all of their food is reared and grown at this location and represents an extreme worst-case. Taking into account the extreme worst-case assumptions, the impact of emissions on local sensitive Receptors is considered to be not significant. On this basis the Proposed Development will not have an adverse effect upon purchasers of soft fruit or celery. Emissions from the Proposed Development will be compliant with the conditions set by the Environmental Permit issued by the Environment Agency.	Environmental Permit
CC00	**Climate Change**		
CC01	Fossil carbon intensity levels are 49% higher than predicted in incineration plants that have been	The approach to quantifying GHG emissions from the construction, operation and decommissioning of the Proposed Development has been undertaken in line with the latest IEMA	

ID	Matter raised	Applicant Response	Where commitment is secured in the DCO (if applicable)
	studied. These developments have a negative environmental impact.	guidance for assessing GHG emissions and the infrastructure life-cycle modules set out in PAS 2080: Carbon Management Infrastructure. Assumptions remain in line with published material and the guidance documents. The assessment methodology for the quantification of GHG emissions is clearly described in **Section 14.8** and **14.9** of **Chapter 14: Climate Change (Volume 6.2) [APP-041]**. The GHG assessment considers the net change between two scenarios: the 'with Proposed Development' case in which the EfW CHP Facility is constructed and operated, and the 'without Proposed Development' case in which the residual waste is disposed of at landfill. Relative to the 'without Proposed Development' case, the Proposed Development is estimated to result in a net decrease in GHG emissions equivalent to approximately 2,571ktCO_2e over its lifetime (see **Chapter 14: Climate Change (Volume 6.2) [APP-041]**). A summary of the desktop data used to inform the assessment is provided in **Table 14.10** of **Chapter 14: Climate Change (Volume 6.2) [APP-041]** and a full list of assumptions made in the GHG assessment are appended to the ES (**Appendix 14B: Assumptions and limitations (Volume 6.4) [APP-088]**), including the operating parameters and waste composition that have been assumed for the EfW CHP Facility. The ES also includes a sensitivity analysis of waste composition and GHG emissions (**Appendix 14C: Sensitivity Analysis (Volume 6.4) [APP-088]**).	
CC02	Carbon impact of the plant is being overclaimed by the Applicant if the lifetime of the Proposed Development is considered properly. The Applicant	The assessment of methane emissions for landfill in **ES Chapter 14: Climate Change (Volume 6.2) [APP-041]** assumes that rather than all non-fossil (biogenic) carbon being	

ID	Matter raised	Applicant Response	Where commitment is secured in the DCO (if applicable)
	assumes that all non-fossil carbon turns into methane, but this is inaccurate [Steven Barclay MP]	turned into methane, only a proportion of the non-fossil carbon in residual waste is turned into methane. Assumptions regarding the proportion of non-fossil carbon converted to methane are reported in **Section 14.9** of **Chapter 14** (paragraphs 14.9.14 to 14.9.15), which as referenced, are based on factors published by Defra on landfill emissions modelling for a UK scenario. The following assumptions are included in **Section 14.9**: biogenic carbon in residual waste is converted to landfill gas (LFG); the percentage of biogenic carbon converted to LFG is 50% of the total biogenic carbon in the residual waste; the ratio of methane to carbon dioxide in LFG at UK landfill sites is calculated to be 57:43%; and fossil (non-biogenic) carbon in landfill waste does not contribute to GHG emissions. Therefore, whilst an assumption is stated that non-fossil carbon in the waste turns in to LFG, the assessment has also considered that LFG represents a proportion of non-fossil carbon in the waste (half), and of this, only some of the LFG would be available as methane (57%).	
CC03	A state of climate emergency was declared by Cambridgeshire County Council in 2019; as a Council, the aim is to reach net zero by 2045. Emissions from burning materials such as plastic could be significant, and the Council is concerned that carbon capture and storage hasn't been considered.	The GHG assessment (see **Chapter 14: Climate Change (Volume 6.2) [APP-041]**) considers the net change between two scenarios: the 'with Proposed Development' case in which the EfW CHP Facility is constructed and operated, and the 'without Proposed Development' case in which the residual waste is disposed of at landfill. Relative to the 'without Proposed Development' case, the Proposed Development is estimated to result in a net decrease in GHG emissions equivalent to approximately 2,571ktCO_2e over its lifetime. In accordance with IEMA guidance (2022) for defining significance it is concluded that the GHG impact of the Proposed Development will have a	

ID	Matter raised	Applicant Response	Where commitment is secured in the DCO (if applicable)
		beneficial Significant effect. The Proposed Development has net GHG emissions below zero, causing an indirect reduction in atmospheric GHG emissions which has a positive impact on the UK Government meeting its carbon budgets/targets. As stated in **Table 14.15, ES Chapter 14: Climate Change (Volume 6.2) [APP-041]**: "*The Proposed Development will be carbon capture retrofit ready with land set aside for a CCS facility. However, the Application does not include the construction and operation of the carbon capture technology within the Proposed Development*." Two Requirements have been added to Schedule 2 of the **draft Development Consent Order (Volume 3.1)** submitted at Deadline 1. The first, Requirement 22, safeguards space for future carbon capture and export equipment. The second, Requirement 23, provides an ongoing obligation on the Applicant to undertake a feasibility study of CCS technology every two years. The plan showing the carbon capture and export readiness reserve space will be submitted at Deadline 2.	
CC04	Plans for carbon capture technology are contingent on Government policies requiring it. They are a plan for the future and are not intended to be included in the Proposed Development.	As stated in **Table 14.15, ES Chapter 14: Climate Change (Volume 6.2) [APP-041]**: "*The Proposed Development will be carbon capture retrofit ready with land set aside for a CCS facility. However, the Application does not include the construction and operation of the carbon capture technology within the Proposed Development*." Two Requirements have been added to Schedule 2 of the **draft Development Consent Order (Volume 3.1)** submitted at Deadline 1. The first, Requirement 22, safeguards space for future carbon capture and export equipment. The second, Requirement 23, provides an ongoing obligation on the Applicant to undertake a feasibility	

ID	Matter raised	Applicant Response	Where commitment is secured in the DCO (if applicable)
		study of CCS technology every two years. The plan showing the carbon capture and export readiness reserve space will be submitted at Deadline 2.	
FR00	**Flood Risk** *Concerns were raised about the flood risk to the area and the practical issues this would cause for the Proposed Development*		
FR01	As indicated by the great flood of 1953 and the storm surge of 2013, the local area is prone to flooding. This suggests that inaccurate meteorological data must have been used by the Applicant to determine that the site is an appropriate location for the Proposed Development.	Extensive consultation has been undertaken with the Environment Agency during pre-application and remains ongoing following the submission of the DCO application. The **Flood Risk Assessment (Volume 6.4 of the ES) [APP-084]** has assessed flood risk at the Proposed Development site using the latest Environment Agency flood modelling for the area (2011 Nene Tidal Hazard mapping). This indicates that the Proposed Development will remain entirely dry during the design flood event (overtopping of the Nene flood defences plus climate change) but is at residual risk of flooding (breach of the Nene flood defences plus climate change and/or a particularly severe overtopping event in excess of the design flood). Based on the 40-year lifetime of the Proposed Development, the Environment Agency has confirmed that **the Flood Risk Assessment (Volume 6.4 of the ES) [APP-084]** is acceptable.	
FR02	Just yesterday an advanced flood warning was received. Severe flooding and coastal surges have happened in the past, and with global warming and rising sea levels, the concrete apron proposed by the Applicant will not be sufficient to mitigate the risk.	The **Flood Risk Assessment (Volume 6.4 of the ES) [APP-084]** assessed flood risk at the Proposed Development site using the latest Environment Agency flood modelling for the area (2011 Nene Tidal Hazard mapping). This indicates that the Proposed Development will remain entirely dry during the design flood event (overtopping of the Nene flood defences plus climate change) but is at residual risk of flooding (breach of the	Requirement 13 Flood emergency management plan Draft DCO (Volume

ID	Matter raised	Applicant Response	Where commitment is secured in the DCO (if applicable)
		Nene flood defences plus climate change and/or a particularly severe overtopping event in excess of the design flood). The proposed embedded environmental measures to address the residual risk of flooding of the Proposed Development are set out in **Table 12.10** of **Chapter 12: Hydrology (Volume 6.2 of the Environmental Statement (ES) [APP-039]** and were agreed with the Environment Agency through extensive consultation during pre-application. These measures include: • raising the ground level of sensitive infrastructure to a level at or above the modelled flood level for the breach of the Nene flood defences at the 1 in 1000 year plus climate change flood event. The impacts of climate change were assessed in line with the current National Guidance (Flood risk assessments: climate change allowances updated July 2020); and • implementing an appropriate Flood Emergency Management Plan, secured via a DCO Requirement consistent with the **Outline Flood Emergency Management Plan (Volume 7.9 of the ES) [APP-100]**.	3.1) [APP-013]
FR03	The Applicant is proposing to build on a Level 3 floodplain; this is not only very vulnerable but does not meet the criteria in the National Planning Policy Framework. The extra mitigation measures needed to deal with this will increase CO2 release and global warming. Rising sea levels and groundwater are highly likely, and there is a risk of contamination with floodwater from the site.	Consideration of the National Planning Policy Framework On the matter of flood risk, The National Planning Policy Framework states that development should not be allocated or permitted if there are reasonably available alternative sites appropriate for the proposed development and with a lower risk of flooding. The exception to this, in the terms of applications for planning permission, is where they come forward on sites allocated in the development plan (NPPF paragraph 166). In this case, applicants are not required to apply the sequential test.	

ID	Matter raised	Applicant Response	Where commitment is secured in the DCO (if applicable)
		On the matter of flood risk (the sequential test), both at the time the EfW CHP Facility Site was first identified and at the point the option agreement for the land comprising the majority of the EfW CHP Facility Site was signed in 2019, the EfW CHP Facility Site was allocated in the Cambridgeshire and Peterborough Waste and Minerals Development Plan Site Specific Allocations 2012 as a Waste Allocation and Consultation Area (W1C inset map 39) as site allocation W1C (an allocation for waste recycling and recovery facilities (non-landfill) under Policy SSP W1. In view of national policy in the NPPF referenced above and as set out in EN-1, Draft EN1, and the Planning Practice Guidance Flood Risk and Coastal Change there was no requirement upon the Applicant to undertake a sequential test at the time it selected the site, nor through the stages of scoping and period of non-statutory consultation (at which times it still comprised an allocation). In July 2021 (after the commencement of the statutory consultation period for the Proposed Development) the Development Plan was replaced by Cambridgeshire and Peterborough Minerals and Waste Local Plan 2021. This Plan does not allocate sites for waste management purposes instead identifying waste management areas (Policy 10 WMAs). WMAs are existing or committed waste management sites. The EfW CHP Facility Site is identified as a WMA 'existing or committed waste management facility' in the 2021 Minerals and Waste Local Plan and retained within the Fenland Local Plan 2014 as an allocated waste management site. Following the adoption of the Cambridgeshire and Peterborough Minerals and Waste Local Plan 2021, and taking into account feedback received during statutory consultation, the Applicant re-evaluated its site selection process. As part of	

ID	Matter raised	Applicant Response	Where commitment is secured in the DCO (if applicable)
		this re-evaluation, the Applicant undertook a sequential test which considered other WMAs in the Wisbech area (as set out in the **Flood Risk Assessment (Appendix 12A FRA Volume 6.4 [APP-084]).** The Applicant did not identify any other available sites that met its essential site selection criteria, in particular the availability of potential CHP users, and that were located in either Flood Zone 1 or 2. Please refer to response AL01 for details of the Applicant's essential criteria. <u>Flood mitigation measures</u> The **Flood Risk Assessment (Volume 6.4 of the ES) [APP-084]** assessed flood risk at the Proposed Development site using the latest Environment Agency flood modelling for the area (2011 Nene Tidal Hazard mapping). This indicates that the Proposed Development will remain entirely dry during the design flood event (overtopping of the Nene flood defences plus climate change) but is at residual risk of flooding (breach of the Nene flood defences plus climate change and/or a particularly severe overtopping event in excess of the design flood). The proposed embedded environmental measures to address the residual risk of flooding of the Proposed Development are set out in Table 12.10 of **Chapter 12: Hydrology** (**Volume 6.2 of the Environmental Statement (ES) [APP-039]** and were agreed with the Environment Agency through extensive consultation during pre-application. These measures include: • raising the ground level of sensitive infrastructure to a level at or above the modelled flood level for the breach of the Nene flood defences at the 1 in 1000 year plus climate change flood event. The impacts of climate change were assessed in line with the current National	

ID	Matter raised	Applicant Response	Where commitment is secured in the DCO (if applicable)
		Guidance (Flood risk assessments: climate change allowances - GOV.UK (www.gov.uk) updated July 2020); and • implementing an appropriate Flood Emergency Management Plan, secured via a DCO Requirement consistent with the **Outline Flood Emergency Management Plan (Volume 7.9 of the ES) [APP-100].** Raising of ground levels is required to create a suitable safe working platform for the construction works which will then form part of the subbase for the permanent infrastructure. This raised platform also meets the requirements to mitigate against residual flood risk. The works required to raise the ground level of sensitive infrastructure will not lead to an increase in CO2 emissions per se given that the Applicant is seeking to reuse material from areas within the site to achieve the levels required therefore reducing the amount of subsoil excavation or soil importation required.	
NP00	**National Policy** *Concerns were raised that the Proposed Development is not in line with National Policy*		
NP01	The development will directly conflict with National Policy aimed at reducing climate change. The Proposed Development will be responsible for putting 11,256 kt of carbon equivalents into the atmosphere, so cannot understand how it was deemed beneficial for the climate. The calculations fail to take into account the rapid decarbonisation of the industry that will occur in upcoming years. The Applicant's	The GHG assessment (see **Chapter 14: Climate Change (Volume 6.2) [APP-041]**) considers the net change between two scenarios: the 'with Proposed Development' case in which the EfW CHP Facility is constructed and operated, and the 'without Proposed Development' case in which the residual waste is disposed of at landfill. Relative to the 'without Proposed Development' case, the Proposed Development is estimated to result in a net decrease in GHG emissions equivalent to	

ID	Matter raised	Applicant Response	Where commitment is secured in the DCO (if applicable)
	predictions forcibly elevate the predicted CO2 generated, meaning data is skewed in their favour. More accurate figures were put forward to suggest that an extra 3121 kt of CO2 will be generated if the Proposed Development is built, than if it is not.	approximately 2,571ktCO_2e over its lifetime. In accordance with IEMA guidance (2022) for defining significance it is concluded that the GHG impact of the Proposed Development will have a beneficial Significant effect. The Proposed Development has net GHG emissions below zero, causing an indirect reduction in atmospheric GHG emissions which has a positive impact on the UK Government meeting its carbon budgets/targets. As stated in **Table 14.15, ES Chapter 14: Climate Change (Volume 6.2) [APP-041]**: "*The Proposed Development will be carbon capture retrofit ready with land set aside for a CCS facility. However, the Application does not include the construction and operation of the carbon capture technology within the Proposed Development*." Two Requirements have been added to Schedule 2 of the **draft Development Consent Order (Volume 3.1)** submitted at Deadline 1. The first, Requirement 22, safeguards space for future carbon capture and export equipment. The second, Requirement 23, provides an ongoing obligation on the Applicant to undertake a feasibility study of CCS technology every two years. The plan showing the carbon capture and export readiness reserve space will be submitted at Deadline 2. Whilst the Applicant has considered the extent to which the Proposed development would contribute to carbon budgets and net zero within National Policy in the form of Draft NPD EN-3 states at paragraph that **ES Chapter 14: Climate Change (Volume 6.2) [APP-041]** paragraph 14.9.44 to 14.9.47 it should noted that national policy in the form of the Draft NPS EN-3 states that '…..*the Secretary of State does not, therefore, need to assess individual applications for planning consent against*	

ID	Matter raised	Applicant Response	Where commitment is secured in the DCO (if applicable)
		operational carbon emissions and their contribution to carbon budgets, net zero and our international climate commitments.'	
NP02	The development is not consistent with the Government's Levelling-Up Agenda.	The Applicant considers that the Proposed Development will deliver benefits to the local area. These benefits are identified within the Applicant's **Project Benefits Report (Volume 7.4) [APP-095].** This document identifies the benefits arising from the treatment of waste, production of heat and power and the environmental and other benefits such as biodiversity net gain and jobs.	Requirement 6 Biodiversity net gain Requirement 21 Employment and skills strategy Requirement 23 Combined heat and power
NP03	The application does not comply with the NPS. It appears disingenuous.	The Proposed Development is considered to be compliant with NPS EN-1, EN-3 and EN-5 and with the relevant Draft NPSs. The Applicant's has assessed the performance of the Proposed Development against policy contained within each national policy statement and this assessment is reported within the **Planning Statement (Volume 7.1) [APP-092].** The Applicant has also prepared a **National Policy Statement Compliance Tracker (Volume 9.18)** for submission at Deadline 1.	
NP04	Compulsory purchase powers are disproportionate and at odds with Government policy since 2011.	Section 122(3) of the Planning Act 2008 requires the Secretary of State to be satisfied that there is a compelling case in the public interest for the land included within the DCO to be acquired compulsorily. The Proposed Development has been designed to meet the relevant policy objectives contained within	

ID	Matter raised	Applicant Response	Where commitment is secured in the DCO (if applicable)
		the National Policy Statements for Energy, both existing and draft. The **Statement of Reasons (Volume 4.3) [APP-017]**, section 5.5 sets out the reasons the Applicant believes that there is a compelling case for compulsory acquisition powers to support the Proposed Development. The Applicant is seeking the minimum compulsory acquisition powers required in order to construct, operate and maintain the Proposed Development.	
NP05	The [Proposed Development] is an alternative to landfill but does not support the waste management need to meet net zero. The proposal does not comply with policies 3 or 4 of the minerals and waste local plan.	Draft NPS EN-3 paragraph 2.13.2 states stats that whilst a carbon assessment should be provided by the Applicant as part of its ES, that the Secretary of State does not need to assess individual applications for planning consent against operational carbon emissions and their contribution to carbon budgets, net zero and our international climate commitments. Consistent with the policy stated above, the Applicant has undertaken a carbon assessment, the results of which are reported within **ES Chapter 14 Climate (Volume 6.2) [APP-041]. Section 14.9** concludes that the Proposed Development will have a positive contribution in supporting carbon reduction targets and ambitions for carbon neutrality and net zero in areas where landfill would otherwise be used for residual waste. This conclusion does not account for the additional benefit that would be achieved through the CHP connection to local businesses nor does it account for the future potential for carbon capture. The Applicant has proposed an additional DCO Requirement 23 to require it to regularly investigate the potential for carbon capture within its update to the **Draft DCO (Volume 3.1)** submitted at Deadline 1.	Additional DCO requirement to regularly investigate the potential for carbon capture. Updated Draft DCO (Volume 3.1) [APP-013] submitted at Deadline 1.

ID	Matter raised	Applicant Response	Where commitment is secured in the DCO (if applicable)
		The Proposed Development is compliant with Cambridgeshire and Peterborough Minerals and Waste Local Plan 2021 Policies 3 and 4. Policy 3 Waste Management Needs which records that the net capacity figures it quotes are not ceilings for recycling, treatment or recovery of waste and that proposals will in principle be supported if any of three scenarios apply. Scenario (c) references proposals that would move waste capacity already identified in the quoted table, up the waste hierarchy. The treatment of waste to produce heat and power as proposed by the Applicant does move waste up the waste hierarchy compared with the stated approach contained within the policy which includes for landfill. Policy 4 Providing for Waste Management supports the movement of waste management up the waste hierarchy and states that new or extended facilities should be located within the settlement boundaries of existing or planned major urban areas (which include Wisbech). Where suitable in an urban setting they should be located within employment areas within the settlement boundary or on strategic employment areas. The Proposed Development is located within Wisbech within an employment area.	

Table 2.6 Consultation

ID	Matter raised	Applicant Response	Where commitment is secured in the DCO (if applicable)
CO00	**Inadequate breadth of consultation** *Concerns were raised that the consultation for the scheme was too narrow*		
CO01	Many local people felt excluded from 'having their say', with the parameters for consultation being draw very narrowly by the Applicant.	The Applicant has undertaken a multi-stage pre-application consultation process to ensure that consultees had the opportunity to provide feedback at appropriate points in the development of the Proposed Development. The stages of consultation undertaken were: • Stage 1 Consultation (16 March to 4 May 2020): This comprised the first non-statutory stage of consultation on the emerging proposals for the Proposed Development. The consultation was undertaken at an early stage in the project development process, to provide consultees with an opportunity to influence the proposals. • Due to the COVID-19 pandemic and the associated social restrictions, the public exhibitions proposed as part of the Stage 1 Consultation were postponed. The Applicant committed to rearranging them as soon as possible and subsequently proposed an additional stage of non-statutory consultation prior to the Stage 2 Statutory Consultation (the Stage 1b Consultation – see below). The consultation remained live, and consultees were directed to the project website, email address or community contact point should they have any queries about the consultation or the Proposed Development. • Stage 1b Consultation (18 September to 29 October 2020): This comprised the second non-statutory stage	

ID	Matter raised	Applicant Response	Where commitment is secured in the DCO (if applicable)
		of consultation on the emerging plans for the Proposed Development. The consultation provided a further opportunity for consultees to influence the proposals to be presented at the Stage 2 Statutory Consultation. The consultation included some updates on the proposals resulting from feedback received at the Stage 1 Consultation and the further development and refinement of the proposals. This included an update on the selection of a preferred corridor for the Grid Connection. Stage 2 Statutory Consultation (28 June to 13 August 2021): This comprised the Applicant's statutory consultation on the proposed application in accordance with the requirements of Sections 42, 47 and 48 of the Planning Act 2008. Section 47 consultation took place in February and March 2021 for a period of 29 days. Section 48 notices were placed in newspapers in June 2021, with Section 42 consultation also taking place in June 2021. Figure 3.1 of the **Consultation Report (Volume 5.1) [APP-018]** illustrates the pre-application consultation process. As part of its preparation for the non-statutory and statutory consultation, in order to draw upon their expertise of consulting people in the local area, the Applicant consulted with the host local authorities (Cambridgeshire County Council (CCC), Norfolk County Council (NCC), Fenland District Council (FDC) and the Borough Council of King's Lynn and West Norfolk (KLWN)). The purpose of consulting the host local authorities	

ID	Matter raised	Applicant Response	Where commitment is secured in the DCO (if applicable)
		was to seek feedback on and determine the geographical extent and method of communications to be used to inform the community about the Applicant's proposals. Further details of the Applicant's engagement with the local host authorities to finalise the approach to each stage of consultation can be found at a Section 4.2.1 to 4.2.2 (Stage 1), Section 4.3.1 to 4.3.4 (Stage 1b) and 5.5.11 to 5.5.14 (Stage 2) of the **Consultation Report (Volume 5.1) [APP-018].** All consultations were advertised through a variety of channels including: • Announcements in the local press • Digital advertisements in local media • Via the project website • Mailshot to the local community • Posters at exhibitions and other local venues advertising the public exhibitions and placed one week in advance. Stage 2 statutory consultation was also notified and publicised in accordance with s.42 and s.48 of the Planning Act 2008 and the relevant provisions of the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 and the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017. The Applicant provided the necessary information in accordance with the requirements of the Planning Act 2008 and associated regulations (including the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 and the Infrastructure Planning (Environmental Impact Assessment)	

ID	Matter raised	Applicant Response	Where commitment is secured in the DCO (if applicable)
		Regulations 2017. Having reviewed the matter of the adequacy of consultation, PINS accepted the DCO Application for the Proposed Development for Examination, see **Notification of Decision to Accept Application [PD-001]**. Full details of the Applications statutory and non-statutory pre-application consultation are reported in the **Consultation Report (Volume 5.1) [APP-018]** and the accompanying appendices.	
CO02	Over 30% of the town are Eastern European and were only given a 'tokenistic' consultation at centre where they are presumed to visit. This is insulting and a number of people don't go there. This is not somewhere that the whole community congregates, and so they were not properly consulted.	Prior to holding the Statutory Constatation, a formal consultation was held on the draft Statement of Community Consultation (SoCC) between 26 February 2021 and 27 March 2021, a period of 29 days. Consultation on the draft SoCC took place with the following host local authorities: • Borough Council of Kings Lynn and West Norfolk; • Cambridgeshire County Council; • Fenland District Council; and • Norfolk County Council. This consultation ensured the Applicant understood how consultation might best be undertaken with those affected communities and that the views of these local communities could be taken into account when finalising the proposals for the Proposed Development. Feedback on the draft SoCC was received from all four host local authorities and was considered by the Applicant as part of finalising the approach to the consultation. A full schedule of the	

ID	Matter raised	Applicant Response	Where commitment is secured in the DCO (if applicable)
		responses received on the draft SoCC, the Applicant's response and whether it resulted in a change to the draft SoCC can be seen in **Appendix E of the SoCC [APP-020].** Concerning hard to reach groups, a summary of the feedback received and the changes that were made to the draft SoCC is presented below: • A request was received that a consultation event take place at the Rosmini Centre. The Applicant confirmed that a consultation event was proposed to take place at the Rosmini Centre, as outlined in the draft SoCC. • Comments were received that agreed with the recognition in the draft SoCC that hard to reach groups would have the opportunity to participate in the statutory stage of consultation, including through the provision of documentation and materials during the consultation period and a public event at the Rosmini Centre. The Applicant welcomed the support for the measures detailed to ensure all members of the community were given the opportunity to participate in the consultation process. The SoCC was updated to incorporate changes to the wording, tone and content suggested by the host local authorities and published. In addition to the event at the Rosmini Centre, public exhibitions were held at the following DDA (Disability Discrimination Act)-compliant, accessible venues known to the local community: • Queen Mary Centre, Wisbech • Oasis Community Centre, Wisbech • Wisbech St Mary Sports & Community Centre, Wisbech St Mary	

ID	Matter raised	Applicant Response	Where commitment is secured in the DCO (if applicable)
		• Walton Highway Village Club, Walton Highway • Marshland Hall, Marshland • Walpole Community Centre, Walpole • Tower Hall, Friday Bridge To ensure that all Stakeholders were able to engage in and respond to the consultation, the Applicant offered a range of solutions for people requiring additional assistance. These included making the consultation documents available in large copy print, audio, or Braille on request. A translation service to provide documents in alternative languages was also available on request. To support requests for hard copy documents and/or alternative document formats, the community contact point and Freepost address were available to facilitate requests throughout the period of the consultation. Full details of the Applicant's approach to Consultation for the non-statutory and statutory constatations can be found in the **Consultation Report (Volume 5.1) [APP-018].**	
CO03	Compulsory acquisition of Algores Way was not mentioned in any of the consultation, this is unacceptable especially given the proximity to the Proposed Development.	The use of Algores Way during construction and operation of the Proposed Development was consulted on at PEIR. This section of Algores Way was shown on the plans and referred to in the PEIR Description of the Proposed Development at 3.3.20. which states: *"no physical improvement works are proposed on*	

ID	Matter raised	Applicant Response	Where commitment is secured in the DCO (if applicable)
		Algores Way, other than at the site access, but it has been included within the red line boundary because, although it is openly in public use, it is an unadopted highway and therefore confirmation of rights to use the road for access may be sought as part of the DCO." The PEIR documents were consulted on during statutory consultation which ran from 28th June to 13th August 2021. The statutory consultations were advertised through a variety of channels including: • Announcements in the local press • Digital advertisements in local media • Via the project website • Mailshot to the local community which included business within the Algores Way industrial estate • Posters at exhibition and other local venues advertising the public exhibitions and placed one week in advance. Stage 2 statutory consultation was also notified and publicised in accordance with s.42 and s.48 of the Planning Act 2008 and the relevant provisions of the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 and the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017. The s48 notice sent to s42 consultees and published in local newspapers included a reference to compulsory acquisition powers being sought as part of the Proposed Development (see Appendix I to the Consultation Report [APP-021]).	

ID	Matter raised	Applicant Response	Where commitment is secured in the DCO (if applicable)
		Full details of the Applicant's approach to Consultation for the non-statutory and statutory constatations can be found in the **Consultation Report (Volume 5.1) [APP-018].**	
CO04	The Eastern European community have not had a voice through this consultation, particularly as a result of the pandemic.	See responses CO01 and CO02	
CO05	Consultation events were inadequate; comments were not recorded and feedback given via the website was not acknowledged. Information available at an in-person consultation event was very biased (scale of artist impressions was misleading).	All comments, including those verbally received during consultation events, were logged, assigned a unique reference number and responded to in the Consultation Feedback Reports following non-statutory and statutory consultation [see **Consultation Report (Volume 5.1) [APP-018]**). The approach to consultation was agreed with the Host Authorities and presented within the Statement of Community Consultation. With regard to the reference to artist impressions, the approach taken to the production of the photomontage was one that followed accepted methodology. In addition, the Applicant provided an interactive virtual presentation, which allowed attendees at public exhibition events to view the Proposed Development from their own homes and/or other locations within a given radius. This was prepared by a company that provides a similar service for consultations held on many nationally significant infrastructure projects.	

ID	Matter raised	Applicant Response	Where commitment is secured in the DCO (if applicable)
CO06	Consultation materials were not made available in foreign languages; this excludes large proportions of the community. The materials presented were also deliberately misleading.	See response CO02	
CV00	**COVID-19 pandemic restrictions** *Concerns were raised that the pandemic prevented consultation from being carried out effectively*		
CV01	Local people were too scared to attend public discussions on the Proposed Development during the pandemic. Additional consultation is therefore requested so that everyone is able to have their say.	Due to the Covid-19 pandemic and the associated social restrictions, the public exhibitions proposed as part of the Non-Statutory Consultation (Stage 1) were postponed. In postponing the exhibitions, the Applicant committed to rearranging them as soon as possible and subsequently provided an extension to the Non-Statutory Consultation (Stage 1b) prior to the Stage 2 Statutory Consultation. The Applicant followed prevailing Government guidance as well as seeking legal advice in order to ensure that the public exhibitions were Covid-secure. The Applicant provided a virtual exhibition via its website at both Stage 1b and Stage 2 consultations to provide for members of the public who were vulnerable, or not comfortable attending the exhibitions in person. A full set of consultation documents was available to download free of charge from the Applicants project website. An electronic feedback form was available on the project website. This could either be completed and submitted online or downloaded from the project website and posted via the Freepost address. **Section 4.3.28 to 4.3.29** of the **Consultation Report (Volume 5.1) [APP-018]** report provides further details	

ID	Matter raised	Applicant Response	Where commitment is secured in the DCO (if applicable)
		on the measure in place at the public exhibitions and alternative arrangements that were available.	
CV02	Two separate consultations were held during the pandemic. These were ineffective.	See response to CV01	
DP00	**Local democratic powers** *Concerns were raised that the views of local authorities have not been considered by the Applicant*		
DP01	The Medworth Town, District and County Councils have pledged to oppose this consent on behalf of its constituents. Motions to oppose were also taken in Fenland and Cambridgeshire County Council with unanimous support.	Comment noted.	
DP02	The regional opposition to the proposal is intense. Previous incinerators proposed in Wisbech [sic Waterbeach], Norwich and Kings Lynn were open to a public vote and were hugely opposed.	Comment noted.	
DP03	The Application does not conform to local authority boundaries. The Applicant is bypassing local authority decisions and applying directly to the Government, against the devolved powers that exist. Devolution is merely a way for the Government to pass the blame,	The amount of residual waste to be processed at the Proposed Development will generate in excess of 50 megawatts of electricity. Therefore, the Proposed Development is a Nationally Significant Infrastructure Project (NSIP) under Part 3 Section 14 of the Planning Act 2008 (2008 Act) by virtue of the fact that the	

ID	Matter raised	Applicant Response	Where commitment is secured in the DCO (if applicable)
	and it is placing corporate lobbyist's interests above local interests.	generating station is located in England and has a generating capacity of over 50 megawatts (section 15(2) of the 2008 Act). It, therefore, requires an application for a DCO to be submitted to the Planning Inspectorate (PINS) under the 2008 Act. Please refer to response CO1 for further details about the engagement with local authorities.	
DP04	The Application does not comply with policy 3 or 4 of the Minerals and Waste Local Plan.	The Proposed Development is compliant with Cambridgeshire and Peterborough Minerals and Waste Local Plan 2021 Policies 3 and 4. Policy 3 Waste Management Needs which records that the net capacity figures it quotes are not ceilings for recycling, treatment or recovery of waste and that proposals will in principle be supported if any of three scenarios apply. Scenario (c) references proposals that would move waste capacity already identified in the quoted table, up the waste hierarchy. The treatment of waste to produce heat and power as proposed by the Applicant does move waste up the waste hierarchy compared with the stated approach contained within the policy which includes for landfill. Policy 4 Providing for Waste Management supports the movement of waste management up the waste hierarchy and states that new or extended facilities should be located within the settlement boundaries of existing or planned major urban areas (which include Wisbech). Where suitable in an urban setting they should be located within employment areas within the settlement boundary or on strategic employment areas. The Proposed Development is located within Wisbech within an employment area.	

Table 2.7 Traffic

ID	Matter raised	Applicant Response	Where commitment is secured in the DCO (if applicable)
TR00	**Volume of HGV vehicles** *Concerns were raised about the HGVs transporting waste to the Proposed Development*		
TR01	The proposed 300 vehicles a day would significantly increase traffic flow into Wisbech, forcing traffic onto roads such as Cromwell Road and Freedom roundabout. These roads are already struggling with traffic volumes.	**Table 6.14 ES Chapter 6: Traffic and Transport (Volume 6.3) [APP-050]** summarises the anticipated two-way operational weekday traffic generation; these are: • HGVs delivering waste and consumables and exporting the residuals (Incinerator Bottom Ash (IBA) and Air Pollution Control residues (APCr)) – 284 • Light goods vehicles – 16 • Cars - 62 **Table 6.15** summarise the weekend figures: • HGVs – 64 • Light goods vehicles – 8 • Cars – 24 The environmental impacts of the Proposed Development including HGV traffic associated with construction and operations, have been assessed and reported in **ES Chapter 6 Traffic and Transport (Volume 6.2), [APP-033]** accompanied by **Appendix 6B Transport Assessment (TA) (Volume 6.4) [APP-073].** Between these documents daily and peak hourly assessments are provided including detailed link and junction assessment for both the operational and construction period as appropriate. The junction assessment includes a highways	Requirement 10, 11, 12 and 15 Draft DCO (Volume 3.1) [APP-013]

ID	Matter raised	Applicant Response	Where commitment is secured in the DCO (if applicable)
		safety assessment, identifying accident hot spots and how the increases in traffic at these locations as a result of the Proposed Development can be managed. The Proposed Development also includes for improvements to New Bridge Lane which include for widening, a footpath, pedestrian crossing points and reducing the road speed from the national speed limit to 30mph. With these improvement measures in place the assessments conclude that there will be no significant residual effects resulting from the increase in HGV traffic. Where necessary, embedded mitigation, such as, onsite HGV queuing lanes, is included within the design of the Proposed Development and ongoing operational management plans will ensure that the EfW CHP Facility will continue to be operated appropriately. The operational management plans related to traffic and transportation will be secured by DCO Requirements and include: • **Construction Environmental Management Plan (CEMP) (Volume 7.12) [APP-103],** includes a requirement for Construction Staff Travel Plan – secured by Requirement 10, **Draft DCO (Volume 3.1) [APP-013]** • **Construction Traffic Management Plan (CTMP) (Volume 6.4) [APP-071]** – secured by Requirement 11, **Draft DCO (Volume 3.1) [APP-013];** • **Operational Traffic Management Plan (OTMP) (Volume 7.15) [APP-106]** including route restrictions to reduce impacts to Wisbech Town and surrounding villages. – secured by Requirement 12, **Draft DCO (Volume 3.1) [APP-013];** and	

ID	Matter raised	Applicant Response	Where commitment is secured in the DCO (if applicable)
		• **Operational Travel Plan (Volume 6.4) [APP-074]**– secured by Requirement 15, **Draft DCO (Volume 3.1) [APP-013].** To deliver commitments to operational vehicle route restrictions, and sustainable travel, the Applicant commits to the following draft DCO Requirements. • An **Operational Traffic Management Plan**; based on the outline proposals **(Volume 7.15) [APP-106]** this documents will confirm the vehicle route restrictions (including those mentioned) would be secured **by draft DCO Requirement 12 [APP-013].** • An **Operational Travel Plan;** based on the outline proposals **[APP-074]** this documents sets out how the Applicant aims to reduce single use car borne traffic and would be secured by draft **DCO Requirement 15 [APP-013].**	
TR02	HGV movements will either have to cross oncoming traffic to turn into the Proposed Development site, or turn around at Cromwell roundabout and make a left-hand turn in. This access road (between Guyhirn and Elm roundabout) is often closed due to fatal accident investigations. It was queried whether the Applicant had considered how HGV movements would respond to this situation.	The Applicant has set out an established route for HGVs during both the construction and operation phases. This is set out within the **Outline Construction Traffic Management Plan (ES Chapter 6 Appendix 6A Volume 6.4 APP-072]** and in the **Outline Operational Traffic Management Plan (Volume 7.15) [APP-106].** Both documents will be updated for Deadline 1 to reconfirm the routing. HGVs will therefore access New Bridge Lane heading north along Cromwell Road. In response to CCCs relevant representation the Applicant has updated the Access Improvement drawings to include for a signalised junction at Cromwell Road/New Bridge Lane. The details are shown in	Requirement 11 Construction traffic management plan Requirement 12 Operational traffic management

ID	Matter raised	Applicant Response	Where commitment is secured in the DCO (if applicable)
		section 10 to the updated **Outline Construction Traffic Management Plan, ES Chapter 6: Appendix 6A (Volume 6.4) [APP-072]**. Road closures and/or diversions resulting from third party accidents will be adhered to by the HGV drivers as directed by the Police or National Highway Officers.	plan Draft DCO (Volume 3.1) [APP-013]
TR03	No forecast has been provided for the energy value of deliveries to the site, and there is concern that the volume of waste matter will increase as the energy matter decreases.	The assessment of GHG emissions reported within **ES Chapter 14 Climate (Volume 6.2) [APP-041]** includes additional sensitivity analysis that considers changes to the future composition of waste, which assumes that the design quantity for residual waste managed by the EfW CHP Facility would remain constant (i.e. up to 625,6000 tonnes per annum). It would not therefore change the number of deliveries of waste to the site.	
TR04	Questions were asked as to what mitigation will be in place to manage the number of HGVs. When the road becomes congested there must be a plan to prevent them driving through the town.	The Applicant has set out an established route for HGVs during both the construction and operation phases. This is set out within the **Outline Construction Traffic Management Plan (ES Chapter 6 Appendix 6A Volume 6.4) [APP-072]** and in the **Outline Operational Traffic Management Plan (Volume 7.15) [APP-106].** The route restrictions are identified within Figure 4.3 to the CTMP and in **Figure 2.1** to the **OTMP**. They confirm that the HGVs accessing and egressing the Proposed development will be prevented from using the A1101 north of A47 Elm Road roundabout; Churchill Road (north of Elm High Road); Weasenham Lane (between Algores Way and Elm High Road); and access via the Freedom Bridge Roundabout.	Requirement 11 Construction traffic management plan Requirement 12 Operational traffic management plan Draft DCO

ID	Matter raised	Applicant Response	Where commitment is secured in the DCO (if applicable)
			(Volume 3.1) [APP-013]
TR05	The roads are built on moving silt, creating a risk of subsidence from HGVs. This often causes issues with roads breaking up; it was queried who will be responsible for fixing the roads.	The maintenance of the local road network is the responsibility of Cambridgeshire County Council. However, **Appendix 6A Outline CTMP (Volume 6.4) [APP-072]** confirms the Applicant will appoint an independent contractor to undertake a highway condition survey of the highway before and after construction of the Proposed Development. Any damage caused by the construction activities will be repaired by the Applicant and the road returned to the previous condition. The final CTMP is secured by **Requirement 12, Schedule 2**, **Draft DCO (Volume 3.1) [APP-013].**	Requirement 12, Construction traffic management plan Draft DCO (Volume 3.1) [APP-013]
HT00	**Heavy traffic on local roads** *Concerns were raised about the number of vehicles that would use the local roads*		
HT01	Telling the lorries to only use certain routes will not work, they will ignore instructions and follow their GPS to take the fastest route. The Applicant does not have the powers to enforce this. The roads are entirely unsuitable for the volume of traffic that will arrive.	**Construction Route restrictions** The Applicant will require HGVs to access the EfW CHP Facility Site and Temporary Construction Compound (TCC) either via the A47 Cromwell Road/New Bridge Lane or via the A47/Cromwell Road/Weasenham Lane/Algores Way to access the Algores Way site entrance thus avoiding the Thomas Clarkson Academy. The Applicant will impose contractual restrictions on its contractors to prevent construction HGV traffic on the following roads: • A1101 north of A47 Elm Road roundabout; • Churchill Road (north of Elm High Road);	Requirement 11 Construction traffic management plan Requirement 12 Operational traffic management

ID	Matter raised	Applicant Response	Where commitment is secured in the DCO (if applicable)
		• Weasenham Lane (between Algores Way and Elm High Road); and • Access via the Freedom Bridge Roundabout. **Figure 4.3** to the updated **Outline Construction Traffic Management Plan (CTMP) (Volume 6.4) submitted at Deadline 1** confirms the route restrictions. **Operational Route Restrictions** The operational traffic routes and restrictions are illustrated on **Figure 2.1** to the updated **Outline Operational Traffic Management Plan (Volume 7.15)**. These routes and restrictions ensure that HGVs entering or leaving the EfW CHP Facility Site are prevented from using the following roads: • A1101 north of A47 Elm Road roundabout; • Churchill Road (north of Elm High Road); and • Weasenham Lane (including Algores Way) Exceptions to the above will be limited to local collections of waste and consumables and matters which are beyond the control of the Applicant, such as, where HGVs are directed along routes by Police and/or National Highway officers and/or due to local diversions and closures. In such cases HGV access route restrictions would be temporarily suspended. Details of the Monitoring, review and compliance strategy for the CTMP and OTMP is set out below. ***Monitoring strategy*** A Traffic Coordinator will be responsible for monitoring and enforcement.	plan Draft DCO (Volume 3.1) [APP-013]

ID	Matter raised	Applicant Response	Where commitment is secured in the DCO (if applicable)
		The TCO(s) will undertake necessary monitoring to ensure compliance with the requirements of the CTMP and OTMP, including the maintenance of records and coordination of measures to include the monitoring of HGV routes and compliance with the routing restrictions. ***Review*** The TCO(s) will monitor and review the CTMP and OTMP. These reviews are required to ensure that the CTMP and OTMP delivers on the commitments and achieves the agreed goals. ***Compliance*** As part of the CTMP and OTMP, a series of mechanisms will be established to provide all parties with a clear understanding of the enforcement procedures that will be applied if the requirements contained within the CTMP and OTMP are not achieved. To be confirmed in the detailed CTMP and OTMP, secured by **Requirement 11 and 12** respectively of the **Draft DCO (Volume 3.1) [APP-013]**, It is anticipated that these mechanisms will include: • Implementation of the CTMP and OTMP, adhere to the requirements and meet the goals through management practices. This will include briefings on the obligations and compliance guidance. • Contractual requirements; these will be subject to a performance review by the Applicant. • Actions – To be taken if the commitments of the CTMP and OTMP are breached.	

ID	Matter raised	Applicant Response	Where commitment is secured in the DCO (if applicable)
HT02	Weasenham Way (used to access Algores Way) suffers from many closures and would push traffic onto local roads. Concerns were raised that locals have been asked to report HGVs seen using the incorrect route.	See response to HT01 above. The Applicant will be responsible for monitoring and ensuring compliance with the CTMP and OTMP. In support of this, the Applicant will put in place a complaints procedure so that if any local residents and business owners become aware of any instances of non-compliance they can inform the Applicant so that the Applicant can investigate these issues. However there is no suggestion that locals will be responsible for monitoring HGV traffic associated with the Proposed Development.	
HT03	There is no capacity on the roads to transport in the large volumes of waste needed.	The Applicant has prepared a **Transport Assessment (ES Chapter 6 Traffic and Transport Appendix 6B Volume 6.4 APP-073**), the scope of which was discussed and agreed with the relevant highway authorities including CCC. The conclusion of the Transport Assessment is that there is capacity in the network to accommodate the Proposed Development. In its relevant representation (**RR-002**) CCC stated that the Transport Assessment includes base models which validate well and are considered acceptable, future year modelling carried out in accordance with CCC and National Highway requirements and forecast flows which are agreed as robust. In its relevant representation, CCC is content other than with regard to the right-turn of HGVs into New Bridge Lane from Cromwell Road. To address this issue the Applicant now proposes a signalised junction, the details of which are included within an updated Outline CTMP. This is consistent with the suggestion made by CCC within its relevant representation.	Requirement 11 Construction traffic management plan Draft DCO (Volume 3.1) [APP-013]

ID	Matter raised	Applicant Response	Where commitment is secured in the DCO (if applicable)
HT04	The road infrastructure will not be able to handle the additional traffic. The A47 and B198 are regularly congested already. If HGVs cannot reach the Development due to traffic or accidents, it will not be able to achieve 50MW of power.	To avoid the temporary interruption to the operation of the EfW CHP Facility, the waste bunker would have a storage capacity of approximately 11.5 days (46,000m3). This is set out within **Section 3.4** of **ES Chapter 3 Description of the Proposed Development (Volume 6.2) [APP-030].**	
HT05	Construction, decommissioning and operational phases will all have significant impacts on the local road network. Mitigation is essential.	The Applicant has prepared an assessment of the effects arising from traffic and transport which is reported within **ES Chapter 6 Traffic and Transport (Volume 6.2) [APP-033]**. This identifies the potential environmental effects arising from the construction, and operation of the Proposed development with decommissioning scoped out of the assessment in line with the reasons set out within **ES Chapter 3 Description of the Proposed Development (Volume 6.2) [APP-030].** The Chapter is informed by **Appendix 6A Transport Assessment (ES Chapter 6 Traffic and Transport Appendix 6B Volume 6.4 APP-073)** the scope of which was discussed and agreed with the relevant highway authorities including CCC. The conclusion of the Transport Assessment is that there is capacity in the network to accommodate the Proposed Development. In its relevant representation (RR-002) CCC stated that the Transport Assessment includes base models which validate well and are considered acceptable, future year modelling carried out in accordance with CCC and National Highway requirements and forecast flows which are agreed as robust. In its relevant representation, CCC is content with the assessment other than with regard to the right-turn of HGVs into New Bridge Lane from Cromwell Road. To address this issue the Applicant now	

ID	Matter raised	Applicant Response	Where commitment is secured in the DCO (if applicable)
		proposes a signalised junction the details of which are included within an updated **Outline Construction Traffic Management Plan (Volume 6.4)**. This is consistent with the suggestion made by CCC within its relevant representation.	
HT06	266 heritage buildings in the town will be damaged by the vibrations from heavy traffic on the roads if there are no infrastructure improvements.	See response to HT01 above. The Applicant will introduce and manage route restrictions to prevent HGVs from routing through the town centre (including the Wisbech Conservation Area). The routing restrictions are illustrated on Figure 4.3 to the updated **Outline Construction Traffic Management Plan (CTMP) (Volume 6.4)** and the operational traffic routes and restrictions are illustrated on Figure 2.1 to the updated **Outline Operational Traffic Management Plan (Volume 7.15)** submitted at Deadline 1. With regard to the potential for vibration, more generally, this has been assessed within **ES Chapter 7: Noise and Vibration (Volume 6.2) [APP-034]**. The assessment considers the potential to affect residential, commercial and industrial Receptors with vibration during the construction and operational phases and includes for vehicle induced vibration. With the exception of New Bridge Lane (which contains no listed buildings) the assessment concludes that increased levels of vehicle induced vibration are unlikely to give rise to any significant effects at Receptors where there are significant baseline flows of HGVs.	Requirement 11 Construction traffic management plan Draft DCO (Volume 3.1) [APP-013]
HT07	There are limited roads in and out of town, meaning that accidents and hold ups are hard to avoid. Especially in summer, the A47 is often impacted with traffic and slow moving farm traffic	The route to be taken by HGVs accessing the operational EfW CHP Facility Site is via the A47/Cromwell Road/New Bridge Lane. This is confirmed within the updated **Outline Operational Traffic Management Plan (Volume 7.15)** submitted at Deadline 1.. Exceptions to the above will be limited to local	Requirement 12 Operational traffic management

ID	Matter raised	Applicant Response	Where commitment is secured in the DCO (if applicable)
		collections of waste and consumables and matters which are beyond the control of the Applicant. Such matters could include instances where traffic management measures introduced by third parties require potentially all vehicles to take alternative routes. Instances are likely to include those where there is direction Police and/or National Highway officers due to local diversions and closures.	plan Draft DCO (Volume 3.1) [APP-013]
HT08	Local roads have an unstable geological makeup and are extremely fragile (the B1101 to Twenty Foot closes annually because of flooding). Major mitigation is needed to stabilise the ground, which would create more noise nuisance	The route to be taken by HGVs accessing the operational EfW CHP Facility Site is via the A47/Cromwell Road/New Bridge Lane. This is confirmed within the updated **Outline Operational Traffic Management Plan (Volume 7.15)** submitted at Deadline 1. The Applicant does not propose to route vehicles along the B1101. The A47 forms part of the strategic highway network operated by National Highways. As such it is assumed to be sufficiently, structurally robust to accommodate existing vehicle flows and the additional vehicles that would result from the Proposed Development. Consultation responses received from National Highways and its relevant representation (RR-021) do not raise concerns regarding structural stability.	Requirement 12 Operational traffic management plan Draft DCO (Volume 3.1) [APP-013]
IT00	**Inaccurate traffic assessment** *Concerns were raised about the accuracy of the data extracted from the traffic assessment*		
IT01	The new Free School is being built on the Thomas Clarkson site, very close to the Proposed Development. The additional traffic numbers this will cause were not incorporated in the traffic assessment	The Applicant has prepared a **Transport Assessment** submitted as **Chapter 6 Traffic and Transport Appendix 6B (Volume 6.4) [APP-073]**. This document assesses the potential effects arising from the construction and operation of the	

ID	Matter raised	Applicant Response	Where commitment is secured in the DCO (if applicable)
		Proposed Development. It considers the current baseline and a future baseline of 2027. This is reported within **Section 7** of **Appendix 6B**, which also records that the approach was agreed with CCC and NCC highway authorities. For the future baseline growth factors derived from TEMPro 7.2 software for light vehicles and from the National Transport Model for HGVs has been used. The discussions held with CCC and NCC resulted in two additional developments being included into the modelled baseline. CCC requested that 'Land north-east of 25 Cromwell Road' a proposed extension to an existing warehouse and a new business park and service station proposed for the Cromwell Road/A47 junction be included. Information was taken from the transport assessments prepared for each development. In its relevant representation (RR-002) CCC comments at paragraph 3.35 that: *Future year modelling has been carried out, again in accordance with the requirements of CCC and NH. Local growth factors (from TEMPro) have been used to give a future year traffic flow baseline. In addition, committed developments in the vicinity of the site have been added to give a robust forecast of the future year base.* On the basis of consultation undertaken, the Applicant is satisfied that the Transport Assessment is robust. The potential for new development other than that cited by CCC is accounted for within the growth factors referenced.	

ID	Matter raised	Applicant Response	Where commitment is secured in the DCO (if applicable)
IT02	Tables on pages 614 and 615 do not account for traffic flow during bank holidays or decommissioning, nor consider the impact permanent scaffolding will have on traffic flow and visual impact	The Applicant has considered the potential for vehicles to access the site for purposes other than those connected directly with the transportation of waste or material required to operate the EfW CHP Facility. **ES Chapter 6 Traffic and Transport (Volume 6.2) [APP-033]** at **Section 6.6.99** assumes that vehicles associated with the maintenance of the EfW CHP Facility will equate to eight arrivals (16 two-way vehicle movements) per week. With regard to decommissioning**, ES Chapter 3 Description of the Proposed Development (Volume 6.2) [APP-030]** records at **Section 3.11.3** that the environmental effects associated with the decommissioning phase would be of a similar level to those reported for the construction phase works, albeit with a lesser duration of one year. On this basis the effects arising from traffic and transport would be the same or less than those assessed for construction. The Applicant would operate the EfW CHP Facility during Bank Holidays. **Section 3.5.51 ES Chapter 3 Description of the Proposed Development (Volume 6.2) [APP-030]** states that it will operate 365 days per year. The baseline traffic surveys were undertaken in October 2021. Whilst these did not include a Bank Holiday, CCC in its relevant representation (RR-002) confirms that this timing of surveys was agreed.	
IT03	Surveys were carried out during the pandemic and are not a true reflection of the traffic impacts	**ES Chapter 6 Traffic and Transport (Volume 6.2) [APP-033]** records that the traffic surveys were undertaken between 08 October and 21 October 2021. These dates were agreed in	

ID	Matter raised	Applicant Response	Where commitment is secured in the DCO (if applicable)
		advance with CCC and NCC. In its relevant representation (RR-002) CCC states that: *The baseline surveys were undertaken in October 2021 which was agreed by both Cambridgeshire County Council (CCC) and National Highways (NH). Whilst certain restrictions/advisory working practices were still in place due to the Covid 19 pandemic this 9 would not have affected traffic patterns in this part of the County to a large extent. Wisbech and surrounding areas have a predominantly manufacturing/agricultural economy and working from home would not have been practical.*