

**Planning Act 2008 (as amended)****Application by Medworth CHP Limited for an Order Granting Development Consent for the Medworth Energy from Waste Combined Heat and Power Facility (EN010110)****Norfolk County Council – Summary of Relevant Representation**

This statement sets out Norfolk County Council's (NCC's) Summary of its Relevant Representation (RR) on the Development Consent Order (DCO) application. The RR addresses only the matters in relation to which NCC has technical competence to scrutinize, and not the planning merits of the proposal. It is principally concerned only with the impacts of the Proposed Development in Norfolk, namely those associated with the grid connection linking the proposed Energy from Waste (EfW) Combined Heat and Power (CHP) facility, to the grid connection point at the Walsoken substation.

The matters comprise the following, presented in the order of the Applicant's Environmental Statement (ES) chapters:

**Chapter 6 Traffic and Transport**

NCC Highway Authority (HA) has identified following issues relating to the construction phase and the operational phase of the development:

- Highways impact (on Norfolk roads); and
- Impact of the Grid Connection at Walsoken (including the Installation of Apparatus in the Public Highway etc).

Impact on the Local Highway Network

Whilst the impact at the Elm High Road roundabout will be fully assessed by National Highways, given the volume of background traffic already using the A47 roundabout, NCC officers do not regard the impact as severe in the terms set out in paragraph 111 of the National Planning Policy Framework (NPPF).

Impact of the Grid Connection at Walsoken

The EfW would connect to the power grid at the Walsoken Substation, which is accessed from Broadend Road. The Applicant's intention is to route the connection cable underground along the A47 verge, under the Elm High Road/A47 junction and then for it to continue longitudinally underground along the highway verge of Broadend Road.

The Applicant's is seeking to be classed as a Statutory undertaker as part of their DCO. However, if the DfT do not recognise the Applicant as a statutory undertaker and/or refuse to grant "state codes", the Applicant will not be able to connect their EfW facility to the power grid at the Walsoken Substation.

## **Chapter 7 Noise and Vibration**

NCC Highway Authority has identified potential amenity issues as including noise and vibration from traffic and the resulting impact on residents' quality of life. However, assessment of this issues falls outside the local Highway Authority's remit so that NCC defers to any RR submitted by the Borough Council of King's Lynn and West Norfolk (BCKLWN) on this matter.

## **Chapter 8 Air Quality**

In relation to Chapter 8 Air Quality, Norfolk County Council Highway Authority has identified potential amenity issues as including emissions from traffic and the resulting impact on residents' quality of life. However, assessment of this issues falls outside the local Highway Authority's remit so that NCC defers to any RR submitted by the BCKLWN on this matter.

## **Chapter 9 Landscape and Visual**

NCC's Principal Landscape Architect has raised concerns about the potential landscape and visual impact in Norfolk of the Proposed Development.

The landscape impacts of the grid connection in Norfolk are likely to be minimal with any cable trenches occurring in highways verges and being short term impacts prior to being reinstated like for like. There may be opportunities for enhancement where seeding etc is going to occur, but this would be a matter for later discussions.

In terms of the wider landscape and visual impacts the scale of the Proposed Development means that views from Norfolk are a concern. By nature of the proposal, it is difficult to entirely screen the stack/plume due to their scale and height.

The PRoW network is quite limited in the area to the east of Wisbech, so the primary concern would be with the impact on residential receptors in villages/remote dwellings, road users of the A47 and the smaller road network, and the overall impact on the landscape character.

## **Chapter 10 Historic Environment**

The Norfolk County Council Historic Environment Team advise that the archaeological impact of the grid connection at Walsoken and the cable route in Norfolk is minimal and that they have no other comments at this stage. The Examining Authority should however note that the BCKWN may wish to make a RR in relation to this matter.

## **Chapter 11 Biodiversity**

NCC's Principal Ecologist advises the direct impacts on ecology within Norfolk will be limited to the impacts of the grid connection along the A47 corridor. An Outline Construction Environmental Management Plan (OCEMP) has been drafted which includes in Appendix D an Outline Ecological Mitigation Strategy which will need to be secured via the Requirements in the DCO. Broadly speaking, NCC considers that the embedded environmental measures set out in the OCEMP are acceptable.

Responsibility for the Habitats Regulation Assessment (HRA)/Appropriate Assessment (AA) will lie with the Secretary of State as 'Competent Authority' rather than NCC.

## **Chapter 12 Hydrology**

It is proposed that the cable route crosses ordinary watercourses that are adopted by the King's Lynn internal Drainage Board (IDB) and therefore under the jurisdiction of the IDB rather than the Lead Local Flood Authority (LLFA). In addition, there are a number of other ordinary watercourses that are not adopted by the IDB that are under the jurisdiction of the LLFA. Should any temporary or permanent works be required in these ordinary watercourses, the LLFA will require the Applicant to obtain consent prior to undertaking works within these watercourses.

A review of the surface water flood risk along the route of the Order Limits, indicates that surface water flood risk is localised and of a limited extent, and that the proposed Walsoken Substation and the Grid Connection would be subject to a minimal increase in surface water runoff during construction and operation.

## **Chapter 13 Geology, Hydrogeology and Contaminated Land**

NCC does not raise any issues in relation to Chapter 12, but instead defers to any RR submitted by the BKLWN on this matter.

## **Chapter 14 Climate Change**

Given the scale of the development within Norfolk NCC does not raise any issues in relation to Chapter 14, but instead defers to any RR submitted by Cambridgeshire County Council (CCC) in respect of the proposed EfW plant itself.

## **Chapter 15 Socio-Economics, Tourism, Recreation and Land Use**

NCC's Economic Development team has identified the employment and skills benefit of the Proposed Development as a relevant consideration, to be considered in the planning balance.

It advises that the Applicant has taken a proactive and positive approach to developing an outline Employment & Skills Strategy that reflects the needs and priorities of the local area. It advises that NCC will continue to work with the Applicant to finalise the strategy.

## **Chapter 16 Health**

NCC Public Health have commented on the impact of the project as it pertains to population health in Norfolk.

The UK Health Security Agency (UKHSA) is the national technical expert on possible impacts on health of energy from waste facilities. Public Health England guidance, subsequently adopted by UKHSA as one of its successor bodies, states that "modern, well run and regulated municipal waste incinerators are not a significant risk to public health".

The impact of the proposal on traffic in Norfolk during construction has been assessed as minor and any health impacts related to additional traffic will be negligible.

The Proposed Development could give rise to potential anxiety in local populations both among those living and working immediately adjacent to the application site and those further afield, due to community perceptions of risks to health.

### **Chapter 17 Major Accidents and Disasters**

Norfolk Fire and Rescue Service (NFRS) has advised that it does not have any comment to make on hydrants for that part of the proposed EfW facility. A hydrant should however be installed at the proposed new gird connection in a location to approved by NFRS to ensure adequate fire-fighting water provision and should conform to BS750.

In addition, NCC's Resilience Team has advised that CCC would be the emergency lead for any incident, but that NCC would expect to be informed and involved, given the potential cross-boundary issues in the event of an incident. It advises that particular importance should be attributed to the flood plans for the construction and post-completion phases of the Proposed Development and that it expects further co-ordination when emergency plans are being prepared.

### **Chapter 17 Cumulative Impacts**

NCC does not have any issues to raise in respect of the cumulative impact of the Proposed Development within Norfolk i.e. the cabling and gird connection at Walsoken.

### **Waste Policy matters, including Waste Availability, Composition and Capacity**

NCC does not wish to raise any issues in relation to this matter, but instead defers to any RR submitted by CCC, in whose area the EfW facility would be located.

### **Additional Representations**

It understood that the purpose of the RR is to facilitate the Examining Authority, to identify and carry out an initial assessment of the principal issues, rather than to engage in substantive consideration of the each of these issues.

Date: 10 March 2023