

# Comments on any further information/submissions received by Deadline 1

Borough Council of  
King's Lynn &  
West Norfolk



Planning Inspectorate reference: EN010110

IP Reference: 20033403

## Proposed Medworth Energy from Waste Combined Heat and Power Facility

### Noise and Vibrations

We have also looked at the applicant's comments on our Noise and Vibration query and are satisfied that these concerns will be dealt with via the Outline CEMP [APP-103].

### Air Quality

The Applicants response to BCKLWN's Relevant Representation (RR) is noted and set out within Table 2.1 within REP1-028. It is also accompanied by REP1-014 (Air Quality Appendix 8B – Air Quality Technical Note (Tracked)) which provides an update to the air quality assessment following the Councils' RR comments.

In terms of the Applicant's response to the RR, the BCKLWN comments have since been expanded on, as explained more fully with the NCC Local Impacts Report (LIR). This provides the most up to date response where for example BCKLWN are broadly in agreement with air quality related matters raised at RR, but also where we are yet to agree for example;

- 1.1 Under Health Damage Costs / AQ Monitoring (Sections 9.39 – 9.43 LIR) The applicant has indicated that as part its response to offsetting these potential health damage costs and also given the level of concern about air quality that it would be receptive in agreeing scope for an air quality monitoring scheme or strategy (AQMS) prior to commencement (to be agreed). As part of offsetting BCKLWN had previously mentioned within the RR that this could extend to work in progressing air quality

strategy. However, in light of AQ impacts as not being considered significant the LIR adds that the Applicant's response for an AQMS seems reasonable especially given the nature and scale of development proposed and as mentioned the level of concern regarding the emissions. An AQMS would also meet the Institute of Air Quality Management's (2018) position statement on mitigation, which advises that offsetting should be within the vicinity of the development which the AQMS would be.

1.2 Under Traffic/AQ Related Matters (Sections 9.26 – 9.38) the LIR confirms that traffic Air Quality (AQ) input data as set out within REP1-014 is now showing positive values for the respective road links and is therefore considered to be more representative which is welcome. However, the LIR explains that there is still some uncertainty with the AQ input data as it appears less than corresponding values as set out within the Transport Assessment that is based on apportioning the waste by payloads. The AQ road link values also do not tally when distributing the number of HGV vehicles within the traffic network. Based on this uncertainty with traffic / emissions the LIR explains that it increases the need for some roadside AQ monitoring to support the application i.e. a contribution towards the existing roadside diffusion tube monitoring stations (4) that BCKLWN deploy and an additional location along the A1101.

1.3 Within the Deadline 1 submitted documents that is newly presented is an Outline Air Quality Monitoring Strategy (AQMS; REP1-055) which is welcome. The Applicant's response to RR makes it clear that it is willing to commit to undertaking regular monitoring for air quality at locations to be agreed within both BCKLWN and Fenland DC. The Outline AQMS will be secured through newly inserted DCO Requirement 27 that sets out;

*(1) Prior to the date of final commissioning, a local air quality monitoring strategy must be submitted to the relevant planning authority for approval. The local air quality monitoring strategy submitted for approval must be substantially in accordance with the outline local air quality monitoring strategy.*

*(2) The local air quality monitoring strategy must be implemented as approved under sub-paragraph (1).*

The locations as depicted within the Outline AQMS were however submitted some while ago and prior to the Air Quality Assessments carried out. Therefore we would advise that the locations and type of monitoring should be updated in line with comments within the LIR i.e. that considers particulate matter emissions within an urban background type area within BCKLWN. This may require a financial contribution towards the existing roadside monitoring and as agreed new monitoring locations to be provided by the applicant i.e. that require both a s.106 and/or a DCO Requirement. The AQ monitoring scheme would benefit from joint remote interrogation and downloading rather than separately delivered by each local authority to help reassure public about AQ. It may also be of benefit to consult with the relevant public health sections of both NCC and CCC on this AQMS strategy.

1.4 The NCC LIR also expands on air quality matters that BCKLWN are broadly in agreement with for example under LIR Sections 9.18 – 9.25.