Medworth Energy from Waste
Combined Heat and Power Facility

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Applicant's response to the ExA's Written Questions (ExQ1)

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Contents

1. Introduction

1.1 Background

1.1.1 Medworth CHP Limited (the Applicant) submitted an application for development consent to the Secretary of State on 7 July 2022 (the Application). The Application was accepted for examination on 2 August 2022. The Examination of the Application commenced on 21 February 2023.

1.1.2 This document, submitted for Deadline 2 (24 March 2023) of the Examination contains the Applicant's responses to the Examining Authority's (ExA) First Written Questions (ExQ1) issued by the ExA on 2 March 2023.

1.1.3 The Applicant's response to ExQ1 are presented in the following tables:

- Table 2.1 General and Cross Topic Questions;
- Table 2.2 Principle and Nature of the Proposed Development;
- Table 2.3 Air Quality and Human Health;
- Table 2.4 Biodiversity, Ecology and the Natural Environment;
- Table 2.5 Climate Change;
- Table 2.6 Compulsory Acquisition/Temporary Possession;
- Table 2.7 Draft Development Consent Order;
- Table 2.8 Environmental Statement;
- Table 2.9 Flood Risk, Drainage and Water Environment;
- Table 2.10 Geology and Land Use;
- Table 2.11 Historic Environment;
- Table 2.12 Landscape and Visual;
- Table 2.13 Major Accidents and Disasters;
- Table 2.14 Noise and Vibration;
- Table 2.15 Planning Policy;
- Table 2.16 Socio-Economic, Population and Cumulative Effects; and
- Table 2.17 Traffic and Transport.

1.1.4 The Applicant's response is supported by the following appendices presented in **Applicant's response to the ExA's Written Questions (ExQ1) – Appendices (Volume 10.2):**

- 10.2A Application Index;
- 10.2B Technical Note - IBA and APCr Sites and Capacity;

- 10.2C: Biodiversity Net Gain: Next Steps. Update March 2023;
- 10.2D: DIO Correspondence; and
- 10.2E: Human receptors in an AQMA.

Table 2.1 General and Cross Topic Questions

ExQ1	Question to	Question	Applicant Response
GCT.1.1	Applicant	Tables included in Chapter 6 Traffic and Transport, for example, are not searchable. Can the Applicant please ensure that all tables from all documents are searchable and resubmit new versions of those documents?	The Applicant submitted the DCO Application documents and all subsequent documents as PDFs (version 1.7). PDF version 1.7 documents are fully searchable. Following a review of the Applicant's documents published on the PINS website, it appears that some of these have been downgraded to version 1.6 (untagged, and have fast web view activated), including Chapter 6 Traffic and Transport). It is the Applicant's understanding that this change could have occurred as part of the PINS document publication process, and PINS would need to maintain use of PDF version 1.7 in the publication process to ensure these documents are searchable.
GCT.1.2	Applicant	Several Appendixes have been submitted in support of the DCO application with some of the appendixes being grouped together and submitted as individual documents. For those documents that hold more than one technical appendix, e.g. [APP-075], [APP-076], [APP-078], [APP-079], [APP-080], [APP-081], [APP-081], [APP-083], [APP-085], [APP-087], [App-088], [APP-089], [APP-090] the Applicant is asked to prepare and submit an Appendix Index for each one of the documents, with hyperlinks, in order to assist the ExA in the navigation of the document itself	An Appendix Index providing hyperlinks to each of the Appendices published on the project page on the PINS website is provided in **Appendix 10.2A** of **Applicant's response to the ExA's Written Questions (ExQ1) – Appendices (Volume 10.2).**
GCT.1.3	Applicant Cambs CC Fenland DC BCKLWN	Can the Applicant please set out what considerations it has given to the need to develop a S.106 agreement with the Host Local Authorities (HLAs)? And, if the Applicant feels	The Applicant is currently in discussions with Cambridgeshire County Council regarding the need for an agreement pursuant to s106 of the Town and Country Planning Act 1990 to secure a section 278 agreement between the

ExQ1	Question to	Question	Applicant Response
	Norfolk CC	there is a need for one, what are the topics and issues that the S.016 (sic) Agreement should cover? Can the HLAs (Cambs CC, Fenland DC, BCKLWN and Norfolk CC) confirm their position in relation to the need for a S.106 agreement and confirm if any discussions or consideration has been given to this	Applicant and Cambridgeshire County Council under the Highways Act 1980 relating to the Access Improvements. The Applicant does not consider it necessary to cover any further topics within the section 106 agreement as these can be dealt with via a requirement in the DCO. No further section 106 obligations have been requested from the HLAs to date.
GCT.1.4	Applicant	The Applicant, in its Funding Statement (FS) [APP-016] defines itself as a Special Purpose Vehicle (SPV) created to deliver the Proposed Development and as a wholly owned subsidiary of MVV Environment Limited. MVV is a wholly owned subsidiary of MVV Umwelt GmbH whose ultimate parent company is MVV Energie AG. Para 3.1.1 of the FS states that the bank loan will be supported by a parent company guarantee provided by MVV Energie AG. Can the Applicant please confirm which organisation will be the undertaker and which organisation will be the guarantor?	The undertaker will be Medworth CHP Ltd. Following the grant of development consent, the Applicant would draw down funds in the form of equity from its parent company and debt provided via a bank loan direct to the Applicant from selected banks chosen by MVV Energie AG. The bank loan will be supported by a parent company guarantee provided by MVV Energie AG. There are 3 companies who could provide guarantees being: • MVV Environment Ltd • MVV Umwelt GmbH, and • MVV Energie AG Which of the above companies provides the guarantees will depend on the size of the guarantee required. For example, a Parent Company Guarantee and Indemnity was provided by MVV Energie AG to the South West Devon Waste Partnership (SWDWP) under the PFI Contract, whereas a Parent Company Guarantee was provided by MVV Umwelt GmbH to the Devonport Royal Naval Dockyard and to the Secretary of State for Defence, for the Energy Supply Agreements, which are associated with the SWDWP PFI Contract. For this project, the Applicant would propose that MVV Environment Ltd. provides the guarantee for compensation associated with compulsory acquisition. An allowance of £6.4m has been made for compensation payable in respect of any compulsory acquisition included in the DCO based on the advice received from Carter Jonas. Please refer to Section 7.1, **Funding Statement**

ExQ1	Question to	Question	Applicant Response
			(Volume 4.2) [APP-016]. In the event that compulsory acquisition powers are exercised in respect of any of the Order land, a sum representing the compensation due in respect of that land would be subject to a guarantee pursuant to Article 9(1)(a) of the **draft DCO (Volume 3.1) [REP1-007].** It is anticipated that the guarantor will be MVV Environment Ltd as the Applicant does not expect to have to exercise the compulsory acquisition powers in respect of all of the Order land (due to voluntary agreements being in place). However, the Applicant does not consider it necessary or appropriate to name the guarantor at this stage in the process. As part of the Secretary of State's approval of the guarantee pursuant to Article 9(1), the Secretary of State will need to be satisfied that the guarantor is of sufficient financial standing to provide the guarantee at that point in time. If the guarantor is an entity based in Germany, the Secretary of State will require a legal opinion confirming that the entity can legally enter into the guarantee as part of the approval process. It should also be noted that the voluntary acquisition of 9 New Bridge Lane has already taken place and the property is now owned by Medworth CHP Ltd.
GCT.1.5	Applicant	In the Funding Statement please confirm details of the timing and availability of funding	Funding for the Proposed Development will be made available following grant of the DCO and prior to the commencement of construction.
GCT.1.6	Applicant	The approximate maximum heights of the main buildings are set out in Section 3.4 and are consistent with the parameters set out in draft DCO [APP-013]. The tallest structures would be the two chimney stacks each of which would be a maximum of 90m high. The maximum height of the chimneys is set out in the dDCO, however the minimum height is not specified, which could have implications for the adequate dispersal of pollutants. Please can the Applicant explain how the dDCO secures assumptions applied in the assessment	Measures for the control of emissions, including the minimum height of the chimney stacks, will be secured in the environmental permit. However, the Applicant will update Schedule 14 in the **Draft DCO (Volume 3.1) [REP1-007]** submitted for Deadline 3 to include the minimum height parameters for the chimney stacks for clarity.

ExQ1	Question to	Question	Applicant Response
		of air quality that the minimum height of the chimneys would be 84m?	
GCT1.7	Applicant	Cambs CC and Fenland DC RR states, in para. 3.15 that "if the Department for Transport (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".	The Applicant has the powers to carry out the street works under Article 10 of the **Draft DCO (Volume 3.1) [REP1-007]**. As set out in Article 10(2), the power is a statutory right for the purposes of the New Roads and Street Works Act 1991. Once the DCO has been granted, the Applicant will register for a Street Works Act (SWA) Code as an organisation that has the power to undertake works in a street. The SWA Codes are administered by GeoPlace on behalf of the Department for Transport. The Applicant is not aware of any reasons why it would not be granted a SWA Code as it will be able to demonstrate that it has the necessary powers once the DCO is granted.
GCT.1.10	Applicant	Although no works are proposed to be carried out on some of the plots identified in the Land Plan [AS-004] these are included in the red line boundary of the Order limits. Can the Applicant explain the rationale for including these plots and why it believes these should be subject to the DCO?	The **Land Plan (Volume 2.2) [REP1-004]** details land where compulsory acquisition powers and temporary use powers are being sought. As set out in paragraph 5.3 of the **Statement of Reasons (Volume 4.3) [APP-017]**, section 122(2) of the Planning Act 2008 states that compulsory acquisition powers can be granted for land that is required to facilitate or is incidental to the Proposed Development in addition to land that is required for the Proposed Development. For example, a new right of access or right to use an existing drain may be required to facilitate the Proposed Development but no works are required to provide that access or drain. Appendix A of the **Statement of Reasons (Volume 4.3) [APP-017]** sets out the purpose for which compulsory acquisition and temporary use powers are being sought for all plots, including those where there no works are proposed. In addition, there are some areas of the Order limits where no compulsory acquisition powers are being sought but have been included within the Order limits as other DCO powers are required over this land. For example, the A47 is within the Order limits (shown coloured grey on the **Land Plan (Volume 2.2) [REP1-004]**) as the streets powers in Articles 13 and 17 of the **Draft DCO (Volume 3.1) [REP1-007]** are required over this public highway.

ExQ1	Question to	Question	Applicant Response
GCT.1.10 ***(sic)***	Applicant	Paragraphs 4.5.1 to 4.5.6 of NPS EN-1 establish the criteria for good design. Paragraph 4.5.1 includes that good design of energy projects should be "matched by an appearance that demonstrates good aesthetic as far as possible." Please could the Applicant: • expand on how the concept of good design has been considered in the design process for the buildings and structures relation to both aesthetics and functionality; and • ii. explain whether an independent design review of the Proposed Development has been undertaken and if not, why not?	**1. Good Design** NPS EN-1 paragraph 4.5.1 recognises that the concept of good design extends beyond aesthetic consideration recognising that functionality, 'fitness for purpose' and sustainability are equally important. It includes criteria for good design that extend beyond aesthetics to include sustainability, sensitivity and efficiency whilst recognising that the appearance should demonstrate good aesthetics as far as is possible. The paragraph concludes by recognising that much energy infrastructure development is limited to the extent to which it can contribute to the enhancement of an area. <u>EfW CHP Facility</u> The process of design and the consideration given to matters such as context, sustainability and appearance is explained within the **Design and Access Statement (DAS) (Volume 7.5) [APP-096]** and within **ES Chapter 2 Alternatives (Volume 6.2) [APP-029] and Appendix 2A Grid Connection Options report (Volume 6.4) [APP-069].** The concept of good design is driven by the need to create a facility that is functional in that it is able to accommodate the plant and machinery necessary to operate processes efficiently. As an example, the size of the boiler and steam turbines determine the minimum heights of their corresponding buildings. The Applicant's approach has been to adopt the minimum building heights necessary to accommodate the plant and machinery in order to be able to minimise the overall height of the EfW CHP Facility. The placement and resultant massing of the individual building elements is then defined by the operational processes to be employed within them (see **Graphic 3.20 Operational Process Diagram, ES Chapter 3 Description of the Proposed Development (Volume 6.2) [APP-030])**. Placement of the facility in the northern half of the site was influenced by the wider context which is industrial to the north, east and west and the desirability of operational access from New Bridge Lane.

ExQ1	Question to	Question	Applicant Response
			The Applicant has given due attention to the consideration of aesthetics within the framework of functionality described above. The **DAS (Volume 7.5) [APP-096]** explains the considerations given to scale, massing and roof profile at Page 22 and the different cladding styles and colours which are proposed to be used in order to both complement surrounding buildings and reduce the visual impact of the taller building elements. Responding to statutory consultation the Applicant further considered the visual appearance of the EfW CHP Facility. The **DAS (Volume 7.5) [APP-096]** Page 27-29 explains the Applicant's approach to over-cladding and its commitment to explore further the use of kinetic cladding with the potential to incorporate imagery that it relevant to the local area and further improve the aesthetics of the facility. This commitment is secured via the **Draft DCO (Volume 3.1) [REP1-007]** Requirement 2. Aesthetics is also addressed by the Applicant's proposals for landscaping. Locating the EfW CHP Facility within the northern half of the site enables the landscaping of the frontage to New Bridge Lane. The Landscape and Ecology Strategy (**ES Figure 3.4 Chapter 3 Description of the Proposed Development (Volume 6.3) Rev 2** submitted at Deadline 2 is informed both by aesthetics and functionality in that would provide an attractive mix of hedgerows, hedgerow trees, species rich neutral grassland that is appropriate to the landscape character to the south of the site, represents an improvement to the existing frontage to New Bridge Lane (including land currently used as an aggregate storage area) and is functionally, an area of ecological habitat. <u>Administration Building</u> The Administration Building forms part of the EfW CHP Facility and would be located at the visitor and staff entrance to the facility, accessed from Algores Way. The design of the building accommodates the Applicant's functional requirements within a modern, sustainable design. The **DAS (Volume 7.5) [APP-096]** Page 30 explains that the building has been designed to accommodate a community education area and the functional benefit of the flat roof that allows for visitor and a staff access whilst also enabling the formation of a brown roof (an ecological benefit) and solar panelling. Whilst the Applicant's aesthetic preference is for timber wall cladding which is considered to a more appropriate materials when employed alongside the proposed green

ExQ1	Question to	Question	Applicant Response
			wall, **Draft DCO (Volume 3.1) [REP1-007] Requirement 2** provides for the palette of materials to be first agreed with the relevant planning authority. Other elements of the Proposed Development In addition to the EfW CHP Facility and Administration Building the Proposed Development includes for a new of additional works which include the CHP Connection, Grid Connection, Access Improvements and Water Connections. These works are not buildings, however the Applicant has sought to combine functionality with aesthetics in the sense that they are designed to minimise adverse visual effects by placing the Grid Connection (and water Connections) underground and by selecting substation equipment of lower height and by replacing CHP expansion loops with bellows where is passes to the rear of residential properties. **2. Independent design review** NPS EN-1 paragraph 4.5.5 states that applicants and the IPC (now Secretary of State) should consider taking independent professional advice on the design aspects of a proposal. The design process for the Proposed Development has been informed by the technology type, by comments received at non-statutory and statutory consultation and through the appointment of professional designers (architects) and landscape architects. Whilst the Applicant did not seek an independent design review outside of the consultation process, it has evidenced and explained the design for the EfW CHP Facility within the accompanying **DAS (Volume 7.5) [APP-096].** The **DAS (Volume 7.5) [APP-096]** presents a summary of the Stage 1 design process (see process flow graphic, page 17 DAS) and establishes the design principles to be applied (**Appendix A**). Stage 2 – the post DCO consent stage – involves the preparation of detailed design drawings and further consultation and approval of the relevant local authority to ensure the design principles area met. A DCO requirement ensures that the detailed design will be substantially in accordance with the design principles set out in **Appendix A**. In addition to the relevant planning authorities contributing to finalising the detailed design, the Applicant commits to achieving BREEAM accreditation for the EfW CHP Facility and administration building. BREEAM is an independent

ExQ1	Question to	Question	Applicant Response
			certification process to assess sustainable design. The Applicant commits to achieving minimum standard of Good and Excellent for the EfW CHP Facility and administration building respectively. The BREEAM commitments are stated in **Appendix A, DAS (Volume 7.5) [APP-096] and secured by Draft DCO Requirement 2 (Detailed design approval) (Volume 3.1) [REP1-007].**
GCT.1.11	Applicant	Can the Applicant confirm how often it proposes that the Outline Construction Environmental Management Plan (Outline CEMP) is updated?	The **Outline Construction Environmental Management Plan (Volume 7.12) [REP1-024] (Outline CEMP)** was updated and reissued at Deadline 1. Further updates are dependent on future representations on the Outline CEMP during the Examination. Should consent be granted, the Applicant will appoint an EPC contractor to construct the Proposed Development. This contractor will be contractually required to update the Outline CEMP and produce a more detailed, final document which must be consistent with the outline document. **The Draft DCO (Volume 3.1) [REP1-007]** Requirement 10 requires that the final Construction Environmental Management Plan is submitted to the relevant planning authority prior to the commencement of the relevant part of the authorised development. The Outline CEMP includes provisions for compliance with the Considerate Constructors Scheme (including the appointment of a "Monitor"), a stakeholder engagement plan to form part of the detailed CEMP and a complaints procedure to ensure that the effectiveness of the measures set out in the detailed CEMP is monitored (paragraph 3.5.15 to 3.5.25). Monitoring obligations are also set out in the **Outline Dust Management Plan (Appendix A to the Outline CEMP**), **Outline Water Management Plan (Appendix B to the Outline CEMP**), **Outline Ecological Mitigation Strategy (Appendix D to the Outline CEMP), Outline Site Materials and Waste Management Plan (Appendix E to the Outline CEMP)** and **Outline Construction Noise and Vibration Management Plan (Appendix F to the Outline CEMP).**
GCT.1.12	Applicant	Can the Applicant confirm what specific measures it has taken in order to secure engagement with that residents, owners and or	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

ExQ1	Question to	Question	Applicant Response
		occupiers of the New Bridge Lane Traveller site and how these have been formally notified of the proposal?	host authorities and undertaken consistent with its Statement of Community Consultation and included a range of solutions for people requiring additional assistance and those identified as 'hard to reach groups'. 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. Invitations to consultation events were sent to an identified and agreed geographical area, including the New Bridge Lane Traveller site. New Bridge Lane Traveller site postcodes were checked with Royal Mail to ensure invitation flyers to consultation events, newsletters and other correspondence were delivered to those residents, owners and/or occupiers. **The Consultation Report (Volume 5.1) [APP-018-023]** provides full detail of this process.
GCT.1.13	Applicant	Can the Applicant confirm how residents, owners and or occupiers of the New Bridge Lane Traveller site are included in the BoR?	The New Bridge Lane Traveller site is located outside of the Order limits. The New Bridge Lane Traveller site is located adjacent to the public highway. The Applicant is not proposing to stop up the full width of the highway to carry out the Water Connection works, so residents, owners or occupiers of the traveller site will still be able to access the site. The Applicant does not consider that residents, owners or occupiers of the New Bridge Lane Traveller site constitute Category 1, 2 or 3 persons and are therefore not included in the **Book of Reference (Volume 4.1) [REP1-001]**.

Table 2.2 Principle and Nature of the Proposed Development

ExQ1	Question to	Question	Applicant Response
PND.1.1	n/a	As confirmed at ISH1, the ExA notes that the Applicant is intending to submit an updated version of the WFAA at Deadline 2	The Applicant's Deadline 2 submissions include the updated **Waste Fuel Availability Assessment (WFAA) Revision 2 (Volume 7.3)**.
PND.1.2	Applicant	Chapter 3 of the ES [APP-030] states in para. 3.4.20 that, located within the main building, the APC storage area is adjacent to the boiler house building's (ID05) southern elevation. This storage area provides a drive through road to enable the delivery of consumables (hydrated lime and Activated Carbon (AC)) and removal of APC residue (APCr) used in, and generated by, the processes in the APC building (ID07). Since APCr is classified as a hazardous waste, it is stored in contained silos. • Can the Applicant provide details regarding amounts of hazardous wastes by type which will be generated as a result of the Proposed Development? • Can the Applicant explain the proposals for storage of hazardous wastes, including heavy metals?	The only hazardous waste produced by the Proposed Development is air pollution control residue (APCr) which amounts to approximately 5% of waste processed. For 625,600 tonnes of waste treated, approximately 31,280 tonnes of APCr will be produced. These figures are approximate because the actual value will vary slightly depending on waste composition and hydrated lime and activated carbon consumption. Hazardous waste, including heavy metals, is generated in the economiser section of the boiler and air pollution control (APC) system. Together, these are APCr. The boiler and APC system are both kept under negative pressure by the induced draft (ID) fan and therefore, the hazardous waste is contained within the main process. The APCr is collected in sealed hoppers at the bottom of the economiser(s) and fabric filter. From the economiser(s) it is conveyed in a sealed transport system to sealed storage silos. From the fabric filter, a proportion of the residue is returned to the APC system, via a sealed transport system, to improve hydrated lime efficiency, and the remainder is conveyed to the storage silos via another sealed transport system. The combined capacity of the storage silos would be 720m3. The APCr would be collected from the silos using a sealed discharge system into sealed bulk powder carriers, before transport by road to a suitable licenced disposal facility. The **Applicant's response to the ExA's Written Questions (ExQ1) – Appendix 10.2B Technical Note: IBA and APCr Sites and Capacity** submitted at Deadline 2 sets out the Applicant's consideration of potential locations for (including capacity) IBA and APCr treatment/disposal facilities, in accordance with the requirements of paragraph 2.5.77 in NPS EN-3.
PND.1.3	Applicant	At ISH1 the Applicant has confirmed that the capacity created by other EfW Facilities in	For both the local and national analysis of fuel availability, the updated **WFAA (Volume 7.3)** submitted at Deadline 2 has sought to consider the extent to

ExQ1	Question to	Question	Applicant Response
		relation to the WFAA has been taken into consideration. • Can the Applicant please provide details/confirmation of which other EfW facilities were included as part of the Applicant's WFAA? • Can the Applicant also confirm what was the estimated capacity of said facilities also how it has been taken into consideration as part of the WFAA's calculation for the Proposed Development?	which there is a need for additional residual waste management capacity by reviewing the following EfW capacity both in the Study Area and in England: • Operational capacity; • Capacity under construction; • Consented capacity (but not built); and • Capacity in the planning system. The purpose of this review was to validate the findings of a key study that the WFAA relies on, namely: *Landfill and Residual Treatment Capacity in the Wider South-East of England, Report for the East of England Waste Technical Advisory Body; the Southeast Waste Planning Advisory Group; and the London Waste Planning Forum*, Sacks Consulting (May 2021). The details of which other EfW facilities within the Study Area which have been included within the Applicant's **WFAA (Volume 7.3)** are listed within Appendix C to that document, updated and submitted at Deadline 2. The individual estimated capacity of each facility is also included within **WFAA (Volume 7.3)** and is identified as follows: • Consented and operational – 925,000 tonnes per annum. • Consented and under construction – 595,000 tonnes per annum. • Consented and not built – 595,000 tonnes per annum. • In planning – 150,000 tonnes per annum. Consented EfW capacity which is either operational or under construction (as set out in Appendix C of the WFFA), equates to ~1,520,000 tonnes per annum. This is ~705,000 tonnes per annum below the findings of the May 2021 study (which assumed a residual waste treatment capacity of 2,225,000 tonnes). An adjustment has been made in this potential 'over-reporting' of residual waste treatment capacity in the May 2021 Sacks report. As such, instead of highlighting a 0.7-2.0 million tonne gap in residual waste management capacity (in line with the conclusions of the Sacks report), the **WFAA (Volume 7.3)** submitted at Deadline 2 has amended this to a gap of almost 1.3 million to over 2.6 million tonnes per annum.

ExQ1	Question to	Question	Applicant Response
PND.1.4	Applicant	The Proposed Development includes a diesel generator. Can you explain how the use of diesel, including emissions, has been taken into consideration as part of the wider environmental impact of the facility?	A description of the emergency diesel generator is provided in **Sections 3.4.37 – 3.4.38, ES Chapter 3: Description of the Proposed Development (Volume 6.2) [APP-030].** The emissions to air from the use of diesel fuel has been taken into consideration within **ES Chapter 8: Air Quality (Volume 6.2) [APP-035].** As discussed in **paragraph 8.6.30**, an 'Emergency' modelling scenario was undertaken which considers the emergency diesel generator that is provided to shut down the plant safely in the event of total loss of power. As discussed in **paragraph 8.10.11 ES Chapter 8: Air Quality (Volume 6.2) [APP-035]**, the combined short-term emission of NOx from the diesel generator has been modelled. The assessment has considered the likelihood of the generator causing exceedance of short-term Air Quality Objectives (AQOs). Long-term impacts were not considered as the generator will only operate for short times during the year.
PND.1.5	Applicant	Can the Applicant please expand on how it believes that the Proposed Development matches the management of waste hierarchy?	The Applicant fully supports the reduction of waste, re-use of waste and recycling of waste and it must be stressed that the facility will not prevent recycling. In terms of the waste hierarchy, it is considered that the Proposed Development will fully deliver implementation of the waste hierarchy – a cornerstone of England's waste management policy and legislative framework - and divert waste from continued management at the bottom of the waste hierarchy (i.e., landfill) up to having value (in the form of electricity recovered from it). The Proposed Development is designed to accept residual waste, from EWC (European Waste Catalogue) codes 19 and 20. These are wastes that remain after source separation of recyclables or processing to recover any such viable recyclable material. At the Applicant's other EfW CHP facilities, the use of EWC codes 19 and 20 prevents the delivery of source segregated or pre-sorted recyclates. The target feedstock is residual waste that is currently being landfilled. As such the facility will move the waste up the waste hierarchy from

ExQ1	Question to	Question	Applicant Response
			disposal to recovery. The WFAA (Volume 7.3) submitted at Deadline 2 provides more information on management in accordance with the waste hierarchy. Compliance with the waste hierarchy is secured via Requirement 14 in the **Draft DCO (Volume 3.1) [REP1-007].**

Table 2.3 Air Quality and Human Health

ExQ1	Question to	Question	Applicant Response
AQHH.1.2	Applicant EA	Table 8B3.6 of Appendix 8A: Stakeholder engagement and consultation comment on Air Quality [APP-078] includes the air quality monitoring results for 2021 of identified sites in the vicinity of the Proposed Development. The percentage of data capture varies considerably from site to site. How can the Applicant the (sic) confident that the data captured is representative of all sites? Does the EA have any comments to make on the date included here?	**Table 8B3.6** sits within Revision 3 of **Appendix 8B: Air Quality Technical Report (Volume 6.4)** submitted at Deadline 2**.** The air quality monitoring data used is considered to be appropriate to characterise the existing air quality in the vicinity of the Proposed Development. There are monitoring sites in different situations (e.g. roadside and background) across the geographic area considered in the assessment adopting both automatic monitoring and diffusion tubes. Cambridgeshire County Council and Fenland District Council provided written comments to the Applicant's methodology on 21/7/20 and welcomed the use of this mixed approach to monitoring. It recommended that passive monitoring be extended beyond six months and the Applicant's passive monitoring stations were commissioned in October 2020 until December 2021, thus providing more than 12 months of passive monitoring data. Revision 3 of **Appendix 8B (Volume 6.4)** submitted at Deadline 2 provides a summary of the stakeholder consultation on air quality matters. If a monitoring site in **Table 8B3.6,** Revision 3 of **Appendix 8B (Volume 6.4)** submitted at Deadline 2 reported data capture less than 75% (for example because tubes were missing for particular months), which is fewer than nine months of data, the average NO_2 concentration was annualised according to the methodology outlined within the Defra Local Air Quality Management Technical Guidance document (LAQM.TG22)[1].
AQHH.1.6	Applicant	Para 8.8.17 of Chapter 8 of the ES [APP-035] states that, regarding internationally designated biodiversity sites, namely Nene Washes and Ouse Washes SPA, SAC and Ramsar for this assessment and in line with the EA guidance, effects may be screened out as insignificant and do not require further assessment if the long-term PC is less than	Paragraph 8.8.17 of **ES Chapter 8 Air Quality (Volume 6.2) [APP-035]** refers to advice found within the EA's Air Emissions Risk Assessment guidance[2].

[1] Defra (2022). Local Air Quality Management Technical Guidance (TG22)

[2] Environment Agency (2022) Guidance – Air emissions risk assessment for your environmental permit.

ExQ1	Question to	Question	Applicant Response
		1%, or the short-term PC is less than 10% of the air quality assessment level (AQAL). Please can the Applicant clarify the EA advice they refer to in paragraph 8.8.17 of ES Chapter 8?	
AQHH.1.7	Applicant	Could the Applicant please provide further information on how the potential direct and indirect effects of traffic movement, including noise and air quality, are proposed to be mitigated against, particularly in relation to sensitive receptors, including but not limited to schools?	With respect to traffic noise, there are no significant effects at any sensitive receptor (residential, educational or commercial). This is reported in **ES Chapter 7: Noise and Vibration (Volume 6.2) [APP-034]** Section 7.6.23 for construction traffic and Section 7.6.41 for operational traffic. Therefore, in the absence of significant traffic noise, no mitigation is proposed. With respect to the effects of traffic movement on air quality, the results of the road traffic emissions assessment are presented in Table 8B.H1 in Annex H of the Air Quality Appendix 8B which has been updated to clarify the volumes of construction traffic anticipated and submitted as part of Deadline 1. Results show that the magnitude of impacts from road traffic emissions at each sensitive human receptor are negligible and not significant, therefore further mitigation of these impacts is not proposed. The air quality assessment presented in **ES Chapter 8: Air Quality (Volume 6.2) [APP-035]**, outlines the approach taken to scoping Receptors into the assessment (Sections 8.6.5-8.6.14). The Receptors identified included the closest Receptors to the emissions sources (chimney and traffic), to ensure the maximum impact on the local community was considered. **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. The **Outline Construction Traffic Management Plan (Volume 6.4) [REP1-011]** and **Outline Operational Traffic Management Plan (Volume 7.15)**

ExQ1	Question to	Question	Applicant Response
			[REP1-026] secured in Requirements 11 and 12 respectively of the **Draft DCO (Volume 3.1) [REP1-007]** include measures to mitigate the effects of traffic on sensitive receptors. This includes specific routing, to avoid construction and operational traffic passing close to sensitive receptors, such as schools.
AQHH.1.8	Applicant	Section 8.9 of Chapter 8 of the ES [APP-035] sets out the environmental assessment of air quality effects during construction. The assessment has identified a number of receptors within the buffer zones for dust soiling, and these are identified as high sensitivity receptors. However, with mitigation measures in place, no significant effects are anticipated. Can the Applicant confirm if the mitigation measures have been agreed with relevant stakeholders?	The mitigation measures outlined within Table 8.25 of **ES Chapter 8: Air Quality 9 Volume 6.2) [APP-035]** have been included within the Outline Dust Management Plan (DMP) included within the **Outline Construction Environmental Management Plan (CEMP) [REP1-024]** as Appendix A. The Outline DMP was consulted upon as part of the Draft Outline Construction Environmental Management Plan at statutory consultation when it was known as Dust Mitigation Measures. Two of the four host authorities made comments specific to the mitigation of dust. The Borough of Kings Lynn and West Norfolk recognised the IAQM recommended mitigation measures for dust effects which were presented within the draft Chapter 8 Air Quality and noted that it demonstrated good practice with the Draft Outline Construction Environmental Management Plan produced at PEIR controlling fugitive dust emissions. No comments specific to dust mitigation were received from Norfolk County Council or Cambridgeshire County Council. The CEMP is secured via Requirement 10 of the **Draft DCO (Volume 3.1) [REP1-007]**. Agreement on the Outline Dust Management Plan appended to the Outline CEMP is being sought from the Host Authorities within the Statements of Common Ground.
AQHH.1.9	Applicant	Annex C Modelled Receptors of the ES Chapter 8 Air Quality Appendices [APP-078] provides a list of receptors and their addresses, however it does not show which are included within a AQMA. Can the Applicant provide a list of receptors which are located within an AQMA and a summary of how the Proposed Development is anticipated to affect these receptors, both during construction and operation?	A list of receptors which are located within an AQMA are presented in **Appendix 10.2E** of the **Applicant's response to the ExA's Written Questions (ExQ1) – Appendices (Volume 10.2)** submitted at Deadline 2. Results for the construction phase assessment are reported in Table 8B.H1, Annex H of Revision 3 of the **Air Quality Appendix 8B (Volume 6.4)** submitted at Deadline 2. The results show negligible impacts at each sensitive receptor.

ExQ1	Question to	Question	Applicant Response
			Results for the operational phase of the Proposed Development are summarised in Table 8B6.1 under normal operation. The results show negligible impacts at each sensitive receptor.
AQHH.1.10	Applicant	Chapter 8 of the ES [APP-035] and Appendix 8B: Air Quality Technical Report [APP-078] state that hydrogen chloride (HCl) is a pollutant which has been assessed, although it appears that specific data has not been included in the tables contained in the Appendix 8B: Air Quality Technical Report [APP-078] whereas it has been for other pollutants. Can the Applicant explain why data has not been included for hydrogen chloride?	HCl results are reported within Table 8B.H17, Annex H of Revision 3 of the **Air Quality Appendix 8B (Volume 6.4)** submitted at Deadline 2.
AQHH.1.11	Applicant	A number of interactions between Chapter 8 of the ES [APP-035] and other relevant aspect chapters of the ES are included. These are listed as: Chapter 5: Legislation and Policy; Chapter 6: Traffic and Transport; Chapter 9: Landscape and Visual; Chapter 11: Biodiversity; Chapter 14: Climate Change; and Chapter 16: Health. No reference is made to the Habitat Regulations Assessment No Significant Effects Report (NSER) [APP-025], despite air quality being identified as a potential impact on the Ouse Washes SPA/SAC and Ramsar sites, and the Nene Washes SPA/SAC and Ramsar Sites within the HRA Report. Could the Applicant please clarify why?	This Section of the ES only identifies the related ES chapters where there is the potential for interaction with Air Quality and not the other application documents. The Applicant can confirm that the results of the air quality assessment within the **ES Chapter 8: Air Quality (Volume 6. 2) [APP-035]** have informed the **HRA NSER (Volume 5.3) [AS-007]**. The HRA considers the effects of collision, disturbance and displacement and air pollution and concludes that there will be no Likely Significant Effects.

ExQ1	Question to	Question	Applicant Response
AQHH.1.13	Applicant	Para 8.6.51 of Chapter 8 of the ES [APP-035] explains the mechanisms which will be implemented to avoid adverse effects from the release of odour. Could the Applicant please provide further information on how effective it believes these mechanisms will be in controlling odour and confirm if it anticipates that any odour will escape? If yes, can the Applicant please confirm how that will be managed?	The Applicant has prepared an **Outline Odour Management Plan (OMP) (Volume 7.11) [REP1-021]** which is one of many operational procedures controlled within the Applicant's Integrated Management System (IMS). This IMS is certified to international standards ISO9001, ISO14001, ISO45001 and ISO5001. **Table 4.1, Outline OMP (Volume 7.11) [REP1-021]** sets out the measures and procedures to control and monitor potential releases of odour associated with the operation of the Proposed Development. As detailed in Section 1.1.2, the Outline OMP is informed by EA guidance and the Best Available Techniques (BAT) Reference Document for Waste Incineration. In the experience of the Applicant, as a result of the appropriate building and process design, the waste bunker can always be kept under slight negative pressure, thus avoiding fugitive emissions of odour. During operation, primary air is drawn from the waste bunker into the combustion chamber where odorous compounds are destroyed. As such, odour is expected to be effectively managed. The odour assessment within Revision 3 **of ES Chapter 8 Appendix 8B Air Quality Technical Report (Volume 6.4)** submitted at Deadline 2 considered periods of maintenance or repair where both furnaces are shut down as a worst-case scenario. During these periods, waste is likely to remain within the storage bunker. The odour assessment considered a scenario where the building air would be extracted and vented through carbon filters by the shut-down exhaust system, to remove odorous compounds, before being released to the atmosphere. The results of this odour assessment concluded that there would be no significant effects on sensitive receptors.
AQHH.1.14	Applicant	Section 8.9 of Chapter 8 of the ES [APP-035] states that a Dust Management Plan will be prepared and included as part of the Construction Environmental Management Plan. At this stage, the CEMP does not include reference to a Dust Management Plan. Can the Applicant provide a draft of the	The Outline DMP is included within the **Outline Construction Environmental Management Plan (CEMP) (Rev 2) [REP1-024]** as Appendix A (referred to as Dust Mitigation Measures at application submission). The Outline CEMP has been submitted as part of Requirement 10 of the D**raft DCO** (**Volume 3.1) [REP1-007]**. Agreement on the outline dust management

ExQ1	Question to	Question	Applicant Response
		Dust Management Plan which will be implemented to reduce adverse effects from the release of dust? Can the Applicant confirm if agreement has been reached with the Local Planning Authority regarding the Dust Management Plan?	measures set out in the Outline CEMP is being sought from the Host Authorities within the Statements of Common Ground.
AQHH.1.15	Applicant EA	The Applicant has determined that there will be no likely significant air quality effects so no monitoring is required for significant effects. However, the Applicant would be required to monitor emissions under its Environmental Permit. Can the Applicant confirm if the Environmental Permit will contain a requirement for monitoring levels of heavy metals and will it require the inclusion of actions if monitoring identifies levels which exceed permitted levels? Does the EA have any comments to make on such a requirement?	As detailed in the Environmental Permit application, in practice, the majority of heavy metals form particles, or are adsorbed onto the surface of other particulate matter and, consequently, are removed by the fabric filter. Heavy metals will be monitored in incinerator bottom ash and air pollution control residues at a frequency of 2 samples per month in the first 12 months then every 3 months thereafter. Unlike the other metals, mercury is present in the flue gases as a vapour. It will be removed from the flue gas through the injection of powdered activated carbon before the dry sorption reactor. In powdered form, the activated carbon provides a large surface area for efficient adsorption of mercury. The Operator is proposing to monitor mercury emissions using periodic extractive techniques in preference to continuous monitoring. Six, separate (i.e., samples taken on different days) extractive mercury results will be obtained during commissioning or, alternatively, a minimum of two tests per month will be taken until six results are available. The Applicant's approach to monitoring and reporting of heavy metal emissions was described in the Technical Note: Capture and Monitoring of Heavy Metals, Appendix A (**Volume 9.23) [REP1-056**] submitted at Deadline 1. The Applicant anticipates that the Environmental Permit (EP) will contain requirements for monitoring frequency, standards and emission limits of heavy metals. However, in the Applicant's experience, it is unlikely that there will be specific requirements relating to exceedances of heavy metal emission limits.

ExQ1	Question to	Question	Applicant Response
			Any exceedance would be notified, in the normal way, within 24 hours of detection via a Schedule 5 – Notification to the Environment Agency, or as specified otherwise in the EP. Any exceedance of heavy metal emission limits would trigger an immediate review of the combustion and air pollution control processes, and waste inputs would also be reviewed to try and ascertain any potential cause for the exceedance. Any corrective actions would be taken as soon as possible. The Applicant expects that all of this would be carried out alongside regular dialogue with the EA, and the frequency of periodic emission monitoring would be reduced to a period agreed with the EA. This would continue until it is proven that heavy metal emissions are stable and below permitted limits.
AQHH.1.16	Applicant	Can the Applicant please provide details on how all emissions will be stringently regulated as to not exceed the required national standards and where possible seek to improve those standards?	The Proposed Development will operate under an Environmental Permit (EP) 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. An application has been made by the Applicant for an EP in August 2022. As detailed in the EP application, emissions from the thermal treatment process, discharged to atmosphere through emission points A1 and A2, will be monitored continuously. Periodic extractive monitoring will be performed for those determinands not requiring continuous monitoring under BAT 4 and the EP. As permitted under Annex VI, Part 6, point 2.3 and footnote 7 of BAT 4. One duty Continuous Emissions Monitoring System (CEMS) and one standby CEMS will be installed for each line. It is expected that the CEMS system will comprise the following components, subject to the completion of the detailed design once an EPC Contractor has been appointed: - Multi-component analysers including sample probe and heated sample line for continuous monitoring of emissions of NO_X, CO, SO_2, HCl, TOC, N_2O, NH_3, H_2O and O_2; - Particulate matter analyser; - Ancillary analysers for gas velocity, temperature and pressure; and - Data acquisition and handling system (DAHS).

ExQ1	Question to	Question	Applicant Response
			The Air Quality assessment of emissions to air expected during the operation of the Proposed Development is reported within **ES Chapter 8: Air Quality (Volume 6.2) [APP-035].** As detailed in **Section 8.6.22**, the Best Available Technique Associated Emission Levels (BAT-AELs) established by the BAT Conclusions were used as the basis for defining the pollutant emission concentrations. The impacts derived by assessing emissions to air due to the Proposed Development were not significant.
AQHH.1.17	Applicant Health Protection Agency (HPA) EA HLAs	Energy from waste facilities can release emissions such as particulate matter, nitrogen oxides, and sulfur dioxide. These emissions can contribute to air pollution and have negative impacts on human health and the environment. What work has the Applicant carried out to try and minimise any emissions? Are the HPA and the EA satisfied that the Applicant has complied with relevant National Policy Statements in relation to minimizing air pollution in energy infrastructure development through the use of best available techniques, monitoring and management of emissions, and compliance with relevant air quality standards and regulations?	An application has been made by the Applicant for an Environmental Permit (EP) in August 2022. An assessment of the Best Available Technology (BAT) for the plant is included in the EP submission. NO_X emission controls have been assessed. The BAT Assessment concludes that selective non-catalytic reduction (SNCR) represents the BAT option for the proposed EfW CHP Facility. This is because whilst Selective catalytic reduction (SCR) performs better from a NO_X emissions release perspective (NO_X emission reductions achieved with SNCR are expected to be 78% of those achieved with SCR), SNCR has fewer cross media effects than SCR (e.g. ammonia slip and spent catalyst waste streams) and, on its own, will meet the required BAT-AELs and prevent an exceedance of respective environmental benchmarks. Acid gas management technologies have been considered and assessed within the BAT assessment. Dry scrubbing and semi-dry processes have been assessed as the most feasible BAT to remove acid gases from the flue gas. The BAT option for the Proposed Development was concluded to be dry scrubbing. A powdered sorbent is injected which reacts with the acid gases and forms a calcium-based compound, thus removing gases such as SO_2. These newly formed calcium-based compounds are passed through a fabric filter which removes particulate matter thus reducing particulate matter emissions to levels within the Emission Limit Values (ELVs) required by the EP.

ExQ1	Question to	Question	Applicant Response
			As a result of these embedded emission control measures, and the chimney, the assessment detailed in **ES Chapter 8: Air Quality (Volume 6.2) [APP-035]**, concluded that impacts from emissions to air are not significant. In **ES Chapter 16: Health (Volume 6.2) [APP-043]** it was concluded health effects associated with air quality during the operation of the Facility on people living and working in the Study Area would not be significant.
AQHH.1.17	Applicant	Table 8.25 of Chapter 8 of the ES [APP-035] provides more details regarding what the monitoring will include. Table 8.25 also states that dust deposition, dust flux, or real-time PM10 continuous monitoring locations will be agreed with the Local Authority. Can the Applicant provide details regarding discussions which have been undertaken with the LPA in order to agree monitoring?	The Applicant has been in discussion with both FDC and BKLWN Environmental Health Officers (EHO) in advance of the application submission to discuss appropriate monitoring locations. This discussion has continued post application submission and has resulted in the Applicant preparing an **Outline Local Air Quality Monitoring Strategy (LAQMS) (Volume 9.21) [REP1-055]** which was submitted at Deadline 1. The LAQMS is secured in Requirement 27 of the **Draft DCO (Volume 3.1) [REP1-007].** The strategy includes the monitoring locations which have been suggested by the relevant EHOs and includes for passive and automatic continuous monitoring at the Thomas Clarkson Academy.
AQHH.1.18	Applicant	What dust monitoring is proposed at boundary locations to ensure that dust management controls and being effective and to provide quantifiable evidence in the event of complaints? What measures are proposed to address any concerns raised?	The Outline DMP included within the **Outline Construction Environmental Management Plan (CEMP) [REP1-024**] as Appendix A includes details of proposed monitoring in Table 2.1. This includes DM8 "*Around the boundary of the active construction areas, undertake daily on-site and off-site inspection*" and DM10 "*Agree dust deposition, dust flux, or real-time PM_{10} continuous monitoring locations with the Local Authority*". Table 2.1 also includes DM4 "*Record all dust and air quality complaints, identify cause(s), take appropriate measures to reduce emissions in a timely manner, and record the measures taken*" and the general Complaints Procedure is discussed in paragraph 3.5.24. As shown in Graphic 1.1, a Stakeholder Engagement Plan and Complaints Procedure Plan will be prepared for the final CEMP. The CEMP is secured in Requirement 10 of **the Draft DCO (Volume 3.1) [REP1-007].** The final CEMP would be agreed with the relevant planning authorities.

ExQ1	Question to	Question	Applicant Response
AQHH.1.18 (sic)	Applicant	Table 16.13 of Chapter 16 of the ES [APP-043] identifies that people living and working in the Study Area will be significantly affected by noise arising from construction of the EfW CHP Facility as well as operational noise, and that the significance of this effect is deemed minor (not significant) with residual mitigation at the local level. How does the Applicant propose that these will be monitored and maintained throughout the lifetime of the Proposed Development and what mechanisms are there in place in order to secure this?	Precise methods of monitoring are not determined at this stage, as precise construction methods are not available at this juncture and will not be available until the EPC contractor is appointed and detailed design progressed. However, the process by which monitoring locations and the requirements of such monitoring are set out in the **Appendix F Outline Construction Noise and Vibration Management Plan (NVMP) of the Outline CEMP (Volume 7.12) [REP1-024]** which is secured under Requirement 10 of the **Draft DCO** (**Volume 3.1) [REP1-007]**. The final CNVMP will be agreed with the relevant planning authorities as part of the discharge of requirements. Noise mitigation and monitoring that will be needed throughout the lifetime of the Proposed Development are a matter for detailed design and will be controlled through the permitting process, however, any requirements for operational monitoring and mitigation will be included in the final Operational Noise Management Plan (ONMP) secured by Requirement 19 paragraphs 4 and 5 of the **Draft DCO** (**Volume 3.1) [REP1-007],** and agreed with the relevant planning authorities as part of the discharge of requirements. The final ONMP would be developed in accordance with the **Outline ONMP (Volume 6.4) [REP1-013].**
AQHH.1.19	Applicant	Can the Applicant please confirm how regularly does it propose that the Outline Odour Management Plan (OMP) is updated?	As detailed in **Section 1.2. Maintenance and review of the Outline OMP, the Outline OMP (Volume 7.11) [REP1-021]** will be reviewed, and updated, in response to specific circumstances. These are: a change to site operations; an incident; or following receipt of a justified complaint. In any event, the OMP will be reviewed no later than three years from the date of the last review.
AQHH.1.20	Applicant	The Outline OMP include sin (sic) Table 4.1. a series of monitoring procedures for measures and proposes actions to be taken if outside optimum process parameters. Can the Applicant please clarify the process through which is proposes a review of the "action taken if outside optimum process parameters" if a persist occurrence is identified and if it has defined ant (sic) triggers for that.	As detailed in paragraph 1.1.2, the **OMP (Volume 7.11) [REP1-021]** is informed by EA guidance and the Best Available Techniques (BAT) Reference Document for Waste Incineration. As such, odour is expected to be effectively managed. The "Action taken if outside optimum process parameters" column of Table 4.1 of the **Outline OMP (Volume 7.3) [REP1-021]** will be reviewed in response to specific circumstances. These are: a change to site operations; an incident; or following receipt of a justified complaint. For example, as detailed in Section 5

ExQ1	Question to	Question	Applicant Response
			of the Outline OMP, complaints will be investigated including an investigation of all odour control measures to ensure they are operating correctly. If it is found that all odour control measures are operating in accordance with the Outline OMP, and the odour complaint is justified, then it will be clear that the existing odour control measures are not sufficient and the "Action taken if outside optimum process parameters" column will be updated accordingly, for example by introducing new procedures in relation to particular odour sources.

Table 2.4 Biodiversity, Ecology and the Natural Environment

ExQ1	Question to	Question	Applicant Response
BIO.1.1	Applicant	The Applicant is asked to provide further information regarding Biodiversity Net Gain (BNG) and how it proposes this will be achieved?	BNG for the Proposed Development would be achieved through a combination of habitat measures on-site and off-site. **Additional Submission – 6.4 Environmental Statement Chapter 11 Biodiversity Appendix 11M Biodiversity Net Gain - Rev 2 [AS-009]** sets out the BNG assessment for the Proposed Development and supporting BNG calculation using Biodiversity Metric 3.0. It identifies the change in biodiversity units for the Proposed Development based on the on-site **Outline Landscape and Ecology Strategy (Revision 2) ES Figure 3.14 (Volume 6.3)** submitted at Deadline 2 which is secured in Requirement 4 of the **Draft DCO (Volume 3.1) [REP1-007];** models appropriate off-site habitat creation/enhancement measures which would provide the target % BNG while satisfying the BNG trading rules; and identifies potential options for the Applicant to provide off-site habitat measures. On 16/11/2022 The Applicant held a project update meeting with the Host Authorities to discuss their relevant representation comments relating to Biodiversity including BNG. The meeting was attended by Cambridgeshire County Council, Norfolk County Council and Fenland District Council. The attendees were satisfied with the Applicant's approach to assessing BNG and the assessment undertaken for the Proposed Development (see **Additional Submission – 6.4 Environmental Statement Chapter 11 Biodiversity Appendix 11M Biodiversity Net Gain - Rev 2 [AS-009]**), and sought that delivery of BNG and associated aftercare is secured through a DCO requirement. Requirement 6 of the **Draft DCO (Volume 3.1) [REP1-007]** secures the need to produce and agree a Biodiversity Net Gain Strategy with the relevant planning authority, in consultation with the relevant statutory nature conservation body. A number of matters have been agreed with Natural England regarding BNG, including the approach and methodology used for assessing and calculating BNG for the Proposed Development and the identification of appropriate habitat measures. These are set out in the draft **SoCG with Natural England**

ExQ1	Question to	Question	Applicant Response
			(Volume 9.6) [REP1-043]. The matters still to be agreed are regarding the delivery of BNG pending the Applicant identifying appropriate mechanisms for delivering BNG habitat measure off-site. **Section 4.2** of the **BNG Assessment (Volume 6.4) [AS-009]** summarised the next steps the Applicant would take to investigate potential BNG opportunities to deliver a 10% net gain. To report progress, at Deadline 2, the Applicant has submitted a progress report; **Appendix 10.2C Biodiversity Net Gain: Next Steps. Update March 2023, (Volume 10.2).**
BIO.1.2	Applicant	The Applicant proposes that a proportion of the BNG would be delivered in-situ, where a minimum of 30-years of appropriate management can be guaranteed during the operational phase as secured through the Outline Landscape and Ecology Strategy. In para 11.10.4 of Chapter 11 of the ES [APP-038] the Applicant states that "an area of landscaping in the southern part of the EfW CHP Facility Site, alongside New Bridge Lane, is reserved to accommodate a potential new bridge embankment. Consequently, in this area it is not possible to guarantee the minimum 30-year habitat management commitment that would be a prerequisite for delivering BNG on this land, so elements of the Outline Landscape and Ecology Strategy in this area is excluded any BNG for the Proposed Development". 1) Can the Applicant please confirm if the text should read: "**are** excluded **from** any BNG for the Proposed Development"? 2) Can the Applicant please also confirm which elements of the Outline	1. Yes, the text in Section 11.10.4 of **Chapter 11 Biodiversity of the ES (Volume 6.2) [AS-008**] should read "**are** excluded **from** any BNG for the Proposed Development". 2. The following areas of habitat are excluded from any BNG calculations: • 0.146 ha of proposed species-rich neutral grassland; • 0.009 ha of proposed native species-rich hedgerow with trees; and • 0.019 ha of retained treeline and scrub. **Figure 3.14 Outline Landscape and Ecology Strategy (Volume 6.3)** has been updated and submitted at Deadline 2 to show these areas (see point 3 below). 3. **Figure 3.14 Outline Landscape and Ecology Strategy (Volume 6.3)** has been updated and submitted at Deadline 2 to show the location and extent of the area which is reserved to accommodate a potential new bridge embankment as "*Area Omitted from Biodiversity Gain and Reserved for Potential Rail Embankment*".

ExQ1	Question to	Question	Applicant Response
		Landscape and Ecology Strategy are excluded from any BNG calculations? 3) Can the Applicant update Figure 3.14 Outline Landscape and Ecology Strategy [APP- 030] in order to show the location and extension of the area of landscaping in the southern part of the EfW CHP Facility Site, alongside New Bridge Lane, that is reserved to accommodate a potential new bridge embankment?	
BIO.1.4	Applicant	The NPS for energy aim to minimise the impact of energy on the environment and promote sustainable development. Can the Applicant please expand on how it has aimed to minimise the impact of the proposal on the natural environment?	The Applicant's consideration of the NPS for energy is set out in the **Planning Statement (Volume 7.1) [APP-091]** and the **National Policy Statement Tracker (Volume 9.18) [REP1-052].** The Applicant has appointed suitably experienced ecologists to undertake biodiversity baseline surveys and Ecological Impact Assessment of the Proposed Development, following good practice methodologies as set out in **ES Chapter 11 Biodiversity (Volume 6.2) [AS-008]**. The Proposed Development avoids directly or indirectly affecting international/national/local nature conservation sites. There has been ecological input to the design of the Proposed Development which sought to avoid or minimise impacts on important ecological features, such as locating the Grid Connection within New Bridge Lane and Broadend Road and within the verge of the A47 (see **Section 2.7 of ES Chapter 2 Alternatives (Volume 6.2) [APP-029]**). **Table 11.16 of ES Chapter 11 Biodiversity (Volume 6.2) [AS-008]** summarises the environmental measures and feature-specific measures that have been embedded into the Proposed Development which would be implemented to avoid or minimise impacts on biodiversity. These measures are included in the **Outline Construction Environmental Management Plan (CEMP) (Rev 2) [REP1-024]** and accompanying **Appendix D Outline Ecological Mitigation Strategy** and the **Outline Landscape and Ecology**

ExQ1	Question to	Question	Applicant Response
			Management Plan [APP-098], which are secured by Requirement 10 and Requirement 5 respectively in **Draft DCO (Volume 3.1) [REP1-007].** The Applicant is committed to delivering Biodiversity Net Gain for the Proposed Development, as outlined in **Additional Submission – 6.4 Environmental Statement Chapter 11 Biodiversity Appendix 11M Biodiversity Net Gain - Rev 2 [AS-009]**. **Section 11.10 of ES Chapter 11 Biodiversity (Volume 6.2) [AS-008]** outlines biodiversity enhancements that would be provided by the Proposed Development. An **Outline Landscape and Ecology Strategy ES Figure 3.14 (Volume 6.3)** updated at Deadline 2 has been developed to provide habitat retention and creation within the EfW CHP Facility Site. This strategy is secured in Requirement 4 of the **Draft DCO (Volume 3.1) [REP1-007].** This strategy aligns with local habitat creation priorities identified in accordance with habitat Opportunity Mapping by the Cambridgeshire & Peterborough Environmental Records Centre and has been designed to extend habitat and connectivity for species and habitats present in the locality. In addition to habitat provisions, the Proposed Development would provide a range of other biodiversity provisions as outlined within **Section 11.10.5 of ES Chapter 11 Biodiversity (Volume 6.2) [AS-008]** to provide sustainable benefits to species and the natural environment, such as the provision of nesting/roosting features, planting of native species which would be of local provenance wherever possible, and using site-won materials where possible during habitat creation to minimise the requirement for importing virgin materials. These measures are included in the **Outline Landscape and Ecology Management Plan (Volume 7.7) [APP-098],** which is secured by Requirement 5 of the **Draft DCO (Volume 3.1) [REP1-007].** In addition, the Applicant proposes to create brown roofs on the Administration Building and Weighbridge and include a green wall on the Administration Building also. The location and extent of the brown roof and green wall can be seen on **ES Chapter 3 Description of the Proposed Development Figure 3.26 Administration building elevations (Volume 6.3) [APP-049]**.

Table 2.5 Climate Change

ExQ1	Question to	Question	Applicant Response
CE.1.1	Applicant	With regard to Climate and Carbon Emissions, can the Applicant identify any aspects of the proposed development which are unlikely to comply with the under review relevant National Policy Statements (NPSs)? For those aspects which are unlikely to comply explain changes to the proposed development to ensure compliance.	The Applicant's consideration of the NPS for energy is set out in the **Planning Statement (Volume 7.1) [APP-091]** and the **National Policy Statement Tracker (Volume 9.18) [REP1-052].** The Applicant can confirm that the Proposed Development does comply with all aspects of under review, NPSs. Both the adopted and the under review or Draft NPS's which are considered relevant to the Proposed Development and climate change are identified and addressed in **Table 14.2** - **Table 14.5** of **ES Chapter 14: Climate Change (Volume 6.2) [APP-041]**. Each table identified relevant policy and signposts to where the relevant policy requirement is addressed within the chapter. The key difference between the Draft NPS and adopted NPS with regard to climate and carbon emissions is the reference within Draft NPS EN-1 to net zero by 2050 (Section 2.2) which is then carried forward into Draft NPS EN-3 and Draft NPS EN-5. Draft NPS EN-3 (paragraph 2.13.2) notes that Applicants will prepare a carbon assessment as part of their ES but that the Secretary of State does not need to assess individual applications against operational carbon emissions as well as their contribution to carbon budgets, net zero and international climate commitments. The Applicant has prepared a carbon assessment as part of the ES, the results of which are reported within **ES Chapter 14: Climate Change (Volume 6.2) [APP-041]** Section 14.9. This concludes that the Proposed Development would contribute to relevant UK carbon budgets (see Table 14.32). Section 4.5 (Greenhouse Gas Emissions) of **the Planning Statement (Volume 7.1) [APP-091**] provides additional consideration on the extent to which the Proposed Development is consistent with both the adopted and draft NPSs. It concludes that the Proposed Development is in accordance with national (and local) policy on GHG emissions and climate change resilience.
CE.1.2	Applicant	In para 2.3.24 of Chapter 2 of the ES, the Applicant states that it has taken into account	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*

ExQ1	Question to	Question	Applicant Response
		the need to ensure that the Proposed Development can deliver future environmental requirements relating to carbon capture and storage. In light of the proposal not being carbon capture ready, can the applicant please explain further what it means by "ensure that the Proposed Development can deliver future environmental requirements relating to carbon capture and storage"?	*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*." Requirement 22 has been introduced into the **Draft DCO (Volume 3.1) [REP1-007]** at Deadline 1 to secure the carbon capture and export readiness reserve space required to deliver future environmental requirements relating to carbon capture and storage. A **Carbon Capture and Export Readiness Reserve Space Plan (Volume 10.7)** detailing the location of this space has been produced and submitted at Deadline 2. In addition, Requirement 23 has been introduced into the **Draft DCO (Volume 3.1) [REP1-007]** at Deadline 1 to secure the production of a carbon capture readiness monitoring report which will set out how the undertaker is monitoring the ongoing feasibility of carbon capture and exploring technology.
CE.1.3	Applicant	In para 2.3.25 of Chapter 2 of the ES, the Applicant states that there is no legal or policy requirements for the EfW CHP Facility to include carbon capture storage apparatus or to be carbon capture ready. Can the Applicant please confirm if there are any reasons other than it not being a policy requirement which justify why the Development Proposal does not include carbon capture and storage?	The potential for carbon capture is also discussed in **Section 3.4.80, ES Chapter 3: Description of the Proposed Development (Volume 6.2) [APP-030]**. The principal reason for not including carbon capture in the Proposed Development is that there are a number of emerging technologies that continue to be developed and assessed. Each has different energy consumption levels and environmental impacts, all of which would need to be assessed in detail. Furthermore, the necessary systems to transport the carbon dioxide captured also need to be developed, and without these there would be no point in capturing it. Transportation options have been assessed at a high level using experienced consultants. The Applicant's parent company has become a participant in the Bacton Thames Net Zero consortium, which is examining a wide ranging project to sequestrate carbon dioxide in expired gas and oil fields linked to the Bacton gas terminal in Norfolk. This includes new pipelines from the emitters to Bacton and as such are outside the scope of this DCO Application. Decisions on what to implement in this area will not be made until sometime after the DCO Application has been approved. However, the Applicant's commitment to investigate and if feasible implement carbon capture for the Proposed Development is secured by **Draft DCO** Requirement 22 and **23 (Volume 3.1) [REP1-007].**

ExQ1	Question to	Question	Applicant Response
			However, it should be noted that the consultation document recently published by the Department for Energy Security & Net Zero, entitled "Decarbonisation Readiness Consultation on updates to the 2009 Carbon Capture Readiness requirements" proposes that the requirements for energy from waste facilities, such as that proposed, to be decarbonisation ready will become part of the Environmental Permit. Subject to that the Applicant expects that detailed assessment of its proposals to be considered decarbonisation ready will be through the Environmental Permitting process.
CE.1.4	Applicant	Can the Applicant please confirm its approach towards Net Zero and also confirm that, as part of its approach and journey to Net Zero, the carbon footprint created by the HGV fleet necessary to transport residual waste to the facility is included?	MVV and consequently the Applicant's corporate objectives are to be carbon neutral by 2040 and thereafter carbon negative, i.e., climate positive, see **Section 1.2, ES Chapter 1: Introduction (Volume 6.2) [APP-028].** MVV's objective is within CCC's own journey for Cambridgeshire to be Net Zero by 2045 (Net Zero Cambridgeshire 2045, (2022). The Applicant confirmed its commitments to Net Zero at ISH1 highlighting that MVV has made commitments towards achieving net zero by 2040 and being climate positive thereafter, and this includes cutting carbon dioxide levels to 80% of their 2018 levels by 2050. All of these objectives are supported in the UK business and, wherever possible, existing and proposed facilities have been futureproofed. **(Agenda Item 3, Table 1.1 (Written Summary of the Applicant's Oral Submissions at ISH1 (Volume 9.23)).** The Applicant's journey towards Net Zero is reflected in the Proposed Development at a micro scale e.g., commitments to BREEAM (see GCT.1.10) and waste education (see **Outline Employment and Skills Strategy (Volume 7.8) [APP-099]** and a macro scale e.g., commitments for future carbon capture (see CE.1.2). The assessment described in **Section 14.9** of **ES Chapter 14 Climate Change (Volume 6.2) [APP-041]** is based on assessing whether the Proposed Development would impede the UK in being carbon net zero by 2050, this being the UK position in terms of meeting international obligations to reduce carbon emissions. The assessment includes quantification of

ExQ1	Question to	Question	Applicant Response
			emissions from operational transport including HGVs, considering the likely origin of the residual waste. 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 (see **Section 14.9** of **ES Chapter 14 Climate Change (Volume 6.2) [APP-041]**). In response to **CCC and FDC's LIR [REP1-074] paragraph 2.3.12** the Applicant has confirmed that the Proposed Development includes for EV car charging. However, electrical HGVs are not currently operational in the UK. The Applicant would be willing to include for future HGV charging should the demand materialise recognising that the choice of vehicle used by local authorities and/or waste collection companies is not within its control.
CE.1.5	Applicant	Can the Applicant please set out how the Proposed Development complies with the latest carbon targets?	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 **Section 14.9** of **ES Chapter 14 Climate Change (Volume 6.2) [APP-041]**). The change in GHG emissions associated with the Proposed Development are contextualised against the UK carbon budgets and GHG emissions policy objectives at national, regional and local scales. The assessment in **Section 14.9** of **ES Chapter 14 Climate Change (Volume 6.2) [APP-041]** has established that the Proposed Development net GHG emissions reduction will equate to 0.004% of the UK's carbon budget for the fourth carbon budget, 0.02% of the UK's fifth carbon budget and 0.03% of the sixth carbon budget. In 2050 when the UK net carbon budget is zero, the Proposed Development will have a beneficial impact equivalent to -67ktCO_2e.

Table 2.6 Compulsory Acquisition/Temporary Possession

ExQ1	Question to	Question	Applicant Response
CA.1.1	Applicant	Please complete the CA Schedule (Annex A) providing updates where appropriate on the position of ongoing negotiations for acquisition by agreement and include the total number of plots for which agreement has not been reached. The Applicant is requested to provide regular updates throughout the Examination.	The CA Schedule was submitted at Deadline 1 (see **Volume 9.17 [REP1-051].** The Applicant will provide an update on the status of negotiations at the Compulsory Acquisition Hearing on 13 April 2023. An updated version of the CA Schedule will be provided at Deadline 3.
CA.1.2	Applicant	Please advise whether the Book of Reference (BoR) [APP-015] is fully compliant with the Department for Communities and Local Government (DCLG) Guidance related to procedures for the compulsory acquisition of land (September 2013)1.	The Applicant can confirm that the **Book of Reference (Volume 4.1) [APP-015]** is fully compliant with the Department for Communities and Local Government (DCLG) Guidance related to procedures for the compulsory acquisition of land (September 2013).
CA.1.3	Applicant	The same Guidance as referred to in CA.1.1 states that ''Applicants should be able to demonstrate that adequate funding is likely to be available to enable the compulsory acquisition within the statutory period following the order being made, and that the resource implications of a possible acquisition resulting from a blight notice have been taken account of.'' The Funding Statement [APP-019] does not identify the CA costs separately from the project costs or explain how a figure for CA costs was arrived at. Please explain the anticipated cost of CA, how this figure was arrived at, and how these costs are going to be met.	Valuation of the anticipated Compulsory Acquisition (CA) costs was undertaken on behalf of the Applicant by Carter Jonas, qualified land agents and surveyors. Paragraph 6.1.2 of the **Funding Statement (Volume 4.2) [APP-016]** states that the estimated capital costs of the Proposed Development of £450m includes the sum of £6.4m to cover the CA costs. The breakdown of the £6.4m figure is set out below: • Permanent acquisition value £4,819,051.63 • Permanent easement value £473,665.00 • Temporary possession value £213,184.00 • Contingency sum value £882,099.37 The above valuation includes the costs of acquiring 9 New Bridge Lane and it should be noted that the voluntary acquisition of 9 New Bridge Lane has already taken place and the property is now owned by Medworth CHP Ltd.

ExQ1	Question to	Question	Applicant Response
			The Applicant refers to its response to ExQ1 GCT.1.4 regarding how these costs will be met.
CA.1.6	Applicant	There are a number of persons identified as 'unknown' in the BoR [APP-015]. Can the Applicant confirm whether further steps have been taken, or will be taken during the Examination, to identify any persons having an interest in the land?	The Applicant undertook the following steps in order to identify any unknown persons having an interest in the Order land: 1. Unregistered land was identified during the Desktop Referencing phase and reviewed again during data refresh using HMLR Documents Register and Title Plans and Web Checks, Electoral Roll (TraceIQ) etc. 2. Unregistered site notices were placed as close as possible to the land in question on public land – these were maintained for 6 weeks. 3. The notices displayed the unregistered land in question and provided details of how to contact the land referencing team with any relevant information. 4. Whilst maintaining the notices on site, any neighbouring or nearby parties, who may have been able to advise further, were engaged with.
CA.1.7	Applicant	The Book of Reference [APP-015] includes a number of Statutory Undertakers with interest in land. Please provide a progress report on negotiations with each of the Statutory Undertakers listed in the BoR, with an estimate of the timescale for securing agreement from them. Please also indicate whether there are any envisaged impediments to the securing of such agreements. State whether any additional Statutory Undertakers have been identified since the submission of the BoR as an application document.	The Applicant has engaged with each statutory undertaker listed in Part 3 of the **Book of Reference (Volume 4.1) [REP1-008].** Appendix B of the **Statement of Reasons (Volume 4.3) [APP-017]** provided a summary of the status of negotiations with the statutory undertakers at the point of DCO application and an update on the status of negotiations with those statutory undertakers that had submitted relevant representations was set out in the **CA Schedule** submitted at Deadline 1 (see **Volume 9.17 [REP1-051]**). A further update has been provided at Deadline 2. The Applicant is in negotiations with a number of statutory undertakers with the aim of reaching agreement on protective provisions and side agreements before the end of the Examination. The Applicant does not consider that there are any impediments to securing such agreements.

ExQ1	Question to	Question	Applicant Response
			Although an updated **Book of Reference (Volume 4.1)** has been submitted at Deadline 2, no additional statutory undertakers have been identified since the submission of the Book of Reference.
CA.1.8	Applicant	Section 122 of the PA2008 states that an order granting development consent may include provision authorising the Compulsory Acquisition (CA) of land only if the SoS is satisfied that the land: (a) is required for the development to which the development consent relates, (b) is required to facilitate or is incidental to that development, or (c) is replacement land which is to be given in exchange for the order land under Section 131 or 132. And that there is a compelling case in the public interest for the land to be acquired compulsorily. Can the Applicant please confirm that all of the land included within the Order Limits, as set out in the Land Plans [AS-004] and identified as subject to CA, meets the requirements set out in Section 122?	The Applicant can confirm that all of the land included within the Order limits meets the requirements set out in Section 122 of the Planning Act 2008. The Applicant refers to Section 6 and Appendix A of the **Statement of Reasons (Volume 4.3) [APP-017]** which provides the purpose for which compulsory acquisition and temporary possession powers are being sought for each plot. The compelling case in the public interest is set out in section 5.5 of the **Statement of Reasons (Volume 4.3) [APP-017]**
CA.1.9	Applicant	Certain special categories of land are subject to additional provisions in the Planning Act where it is proposed that they should be compulsorily acquired. Can the Applicant confirm that no Crown land forms part of the CA and update the ExA on special categories of land?	The Applicant can confirm that no Crown Land or Special Category Land forms part of the Order land.

ExQ1	Question to	Question	Applicant Response
CA.1.10	Applicant	The Applicant is asked to keep the unadopted Section of Algores Way proposed to be CA under review and update the ExA of any changes at the following Deadline throughout the examination.	The Applicant refers to its response to ISH1, see **ISH1 AP6, Table 1.2 Action Written Summary of the Applicant's Oral Submissions at ISH1 (Volume 9.23) [REP1-057]**.
CA.1.12	Applicant Cambs CC Fenland DC Host Authorities	At ISH1 the Applicant has confirmed that, depending on clarification from Cambs CC and Fenland DC regarding their intention for the unadopted highway Section of Algores Way (plots 13/4c, 13/4d and 14/a Land Plan [AS-004]) might lead to a revision of the Land Plans and the rights sought over the land. • Does the Applicant believe that this would trigger the need for further consultation on this change? • Would Cambs CC and Fenland DC and the Host Authorities like to comment on this point?	The Applicant does not consider that the removal of the provisions associated with the adoption of Algores Way would trigger the need for further consultation as this change is not considered to be substantial or fundamentally different from the proposal set out in the DCO application. As mentioned in the Applicant's oral submissions at ISH1 (and noted in the **Written Summary of the Applicant's Oral Submissions at ISH1 (Volume 9.23) [REP1-057]**), Article 25(1) of the draft DCO already enabled the Applicant to seek rights (as opposed to freehold acquisition) over any of the plots shown coloured pink on the Land Plan. The Applicant refers to its responses to ISH1 Action 6 and 7 in the **Written Summary of the Applicant's Oral Submissions at ISH1 (Volume 9.23) [REP1-057]**), which set the consultation undertaken with businesses and owners that use Algores Way and the reasons why powers to compulsorily acquire a new right of access along the unadopted section of Algores Way are required.

Table 2.7 Draft Development Consent Order

ExQ1	Question to	Question	Applicant Response
DCO.1.1	Applicant	Please supply subsequent versions of the draft Development Consent Order (dDCO) in both .pdf and Word formats and in two versions, with the first forming the latest consolidated draft and the second showing changes from the previous version in tracked changes, along with comments/explanations outlining the reason for the change. The consolidated draft version in Word is to be supported by a report validating that version of the dDCO as being in the Statutory Instrument (SI) template and with updated revision numbers.	Going forward clean and tracked versions of the **Draft DCO** in pdf and word will be submitted. The tracked version identifies the changes from the previously submitted version. The Applicant would prefer not to include comments and explanations within the Draft DCO itself as this corrupts the Statutory Instrument template. Instead, the Draft DCO will be accompanied by a Schedule of Changes explaining the reasons for the changes. This aligns with the usual approach taken for DCOs. The Applicant will submit a report validating the Draft DCO at Deadline 7. The Applicant does not consider that obtaining a report validating each version of the Draft DCO submitted into Examination would assist the Examining Authority as the validation process only checks formatting rather than content of the Draft DCO.
DCO.1.2	Applicant	Art 9(4) of the draft DCO [APP-013] states that nothing in this article requires a guarantee or alternative form of security to be in place for more than 15 years after the date on which the relevant power is exercised. Can the applicant explain why it considers 15 years to be sufficient?	A 15 year period has been selected as this fully covers the statutory limitation period for bringing a compensation claim following the exercise of compulsory acquisition powers (6 years) and a conservative allowance of the time required to refer a claim to the Upper Tribunal (Lands Chamber). This is deemed reasonable and proportionate and follows precedents in other DCOs, including Riverside Energy Park Order 2020.
DCO.1.3	Applicant	Where an Applicant is seeking powers in the Development Consent Order (DCO) to acquire land compulsorily, the drafting of the Art. containing the powers should make it clear whether or not the Applicant is also seeking a power to clear the title of the land of all private rights. The Applicant should consider whether the Art. should be subject to a power under a separate Art. which would allow the Applicant to exclude a particular private right from the blanket extinguishment	Article 27 of the **Draft DCO (Volume 3.1) [REP1-007]** provides that all private rights and restrictive covenants over land subject to compulsory acquisition under the Order are extinguished. This applies to the pink land shown on the **Land Plan (Volume 2.2) [REP1-004]**. In respect of the land shown coloured blue on the **Land Plan (Volume 2.2) [REP1-004]**, any private rights and restrictive covenants over land will be suspended but only in so far as the continuance of the right or restrictive covenant would be inconsistent with the exercise of the news rights by the Applicant (Article 27(2)).

ExQ1	Question to	Question	Applicant Response
		power. The Applicant is asked to set out how this has been achieved.	However, Article 27(6)(b) provides that the extinguishment or suspension is subject to a notice being given by the undertaker to the right holder that states that the power does not apply to such private rights or restrictive covenants or any agreement made between the undertaker and the person in whom the right or restriction is vested / belongs
DCO.1.4	Applicant	Art. 2 – definition of "commence" and Sch 2 (Requirements) - Various enabling activities (as defined) are specifically excluded from the definition of "commence". Whilst para 1.6 of the Explanatory Memorandum (EM) claims that these enabling activities will be subject to the Requirements to secure the mitigation required under the ES, this does not actually appear to be provided for in the draft DCO. Can the Applicant please confirm how it proposes to address this issue?	Paragraph 1.6 of the **Explanatory Memorandum (Volume 3.2) [APP-014]** states that the enabling activities are excluded from the definition of commence as they do not include activities which give rise to any likely significant adverse environmental effects as assessed in the Environmental Statement. The mitigation measures secured by the Requirements in Schedule 2 of the **Draft DCO (Volume 3.1) [REP1-007]** are therefore not necessary for these activities. Similar provisions were included in the Riverside Energy Park Order 2020 (referred to as "pre-commencement works") and the Wheelabrator Kemsley K3 Generating Station Order 2021 (referred to as "permitted preliminary works").
DCO.1.5	Applicant	Art. 6 – Disapplication of legislative provisions of the draft DCO [APP-013] includes a series of provisions that would not apply. Nevertheless, no explanation or reasoning behind the disapplication seems to be provided in the EM. Can the Applicant please provide information on the rationale for the disapplication of the statutory provisions included in Art. 6 of the draft DCO?	Section 120(5)(a) provides that an order granting development consent may apply, modify or exclude a statutory provision which relates to any matter for which provision may be made in the Order. The rationale for their disapplication is: • **Regulation 12 of the Environmental Permitting (England and Wales) Regulations 2016 (EP Regulations), section 24 of the Water Resources Act 1991 and the provisions of any byelaws made under paragraphs 5, 6 or 6A of Schedule 25 to the Water Resources Act 1991**: these disapply consents ordinarily required from the Environment Agency. Specifically, these are the requirements for approval under flood defence byelaws made, or deemed to have been made, under the Water Resources Act 1991, consents for abstraction of water and consents in respect of a 'flood risk activity' under the EP Regulations. These are consents for activities which may be a necessary part of constructing the authorised

ExQ1	Question to	Question	Applicant Response
			development. To provide certainty that the authorised development can proceed with the necessary timescales, the Order disapplies the requirement for a separate statutory consent to be obtained from the Environment Agency in relation to these activities. • **Section 23 and bylaws made under section 66 of the Drainage Act 1991**: these disapply consents required from drainage boards or the Minister to provide certainty that the authorised development can proceed without the requirement for separate statutory consents in relation to drainage activities. Again, this is to provide certainty that the authorised development can proceed with the necessary timescales. • Article 6(2) of the **Draft DCO (Volume 3.1) [REP1-007]** seeks to disapply the temporary possession provisions of the Neighbourhood Planning Act 2017. This is required as the relevant sections of the Neighbourhood Planning Act 2017 have not been brought into force and subsidiary regulations to that Act have not yet been made, and there is therefore no certainty as to the requirements of the new temporary possession regime. As such, this enables the temporary possession regime created by this Order to be applied. This approach was accepted by the Secretary of State in the Riverside Energy Park Order 2020.
DCO.1.6	Applicant Cambs CC	Art. 12(2) of the draft DCO [APP-013] states "those parts of each means of access specified in Part 2 of Schedule 6 (access) to be constructed or altered under this Order and which are not intended to be a public highway must be completed to the reasonable satisfaction of the street authority and must be maintained by and at the expense of the undertaker for a period of 12 months from completion and from the expiry of that period by and at the expense of the street authority." What discussions has the Applicant had with Cambs CC on this matter? Does Cambs CC	Article 12 of the **Draft DCO (Volume 3.1) [REP1-007]** is similar to Article 12 of the Riverside Energy Park Order 2020 and Article 12 of the South Humber Bank Energy Centre Order 2021. The Applicant is in discussions with Cambridgeshire County Council regarding a Section 278 Agreement (agreement as to execution of works) under the Highways Act 1980, to address concerns raised in its Relevant Representation and Local Impact Report. This will include the provision of a bond to secure any works required during the maintenance period. Article 16 of the **Draft DCO (Volume 3.1) [REP1-007]** authorises the parties to enter into such an agreement.

ExQ1	Question to	Question	Applicant Response
		agree with the requirements set out in this Art.?	Heads of Terms for the Section 278 Agreement are currently being negotiated with Cambridgeshire County Council.
DCO.1.7	Applicant	Art. 14(1) of the draft DCO [APP-013] states that "the undertaker may use any private road within the Order limits for the passage of persons or vehicles (with or without materials, plant and machinery) for the purposes of, or in connection with, the construction or maintenance of the authorised development." • Can the Applicant please explain the reasoning behind this article and why it believes that the power to take temporary passage over private roads both during the construction and maintenance periods is reasonable and proportionate? • Can the Applicant please provide further information regarding the alternatives considered to the article, namely why Temporary Possession was not a viable/preferred alternative? • Has the Applicant engaged with the relevant land owners and what were the outcomes of such engagement?	As set out in paragraph 1.18 of the **Explanatory Memorandum (Volume 3.2) [APP-014]**, this Article authorises the temporary passage by the undertaker of private roads within the Order limits by persons or vehicles, for the purposes of, or in connection with, the construction and maintenance of the authorised development, without the need for the undertaker to take temporary possession of the land under article 32 of the **Draft DCO (Volume 3.1) [REP1-007]**. There is precedent for this article, for example in the Silvertown Tunnel Order 2018, the Port of Tilbury (Expansion) Order 2019 and the Lake Lothing (Lowestoft) Third Crossing Order 2020. This provision is required to enable the construction of the authorised development to take place in the context of the private roads that exist within the Order limits (for example, part of Algores Way). The Applicant considers that this power is reasonable and proportionate because it is less onerous on the landowner if the Applicant only wishes to use the existing right of way as compared to the temporary possession powers, which are more suitable in circumstances where the Applicant wishes to carry out works to the private right of way and therefore may need to take possession of it. Appendix B of the **Statement of Reasons (Volume 4.3) [APP-017]** provides a summary of how each landowner is affected and details the status of negotiations. As set out in Appendix B, Fenland District Council (as the owner of Algores Way) will not enter into voluntary negotiations with the Applicant.
DCO.1.8	Applicant	The Applicant states in the EM [APP-014] that Art. 19 of the draft DCO [APP-013] is based on a model provision. Could the Applicant please provide further information regarding the model provision on which this Art. was based?	Reference to the model provisions within the Explanatory Memorandum is reference to Article 16 of the Infrastructure Planning (Model Provisions) (England and Wales) Order 2009. Although the model provisions have been repealed, these are still referred to in recent DCOs and PINS Advice Note 13.

ExQ1	Question to	Question	Applicant Response
DCO.1.9	Applicant	Art. 19(1) of the draft DCO [APP-013] allows for the undertaker to enter any land shown within the Order Limits or enter any land which may be affected by the authorised development for the purpose of survey or investigate the land. Can the Applicant please explain the reasoning behind this article and why it believes that the powers sought are reasonable and proportionate?	Article 19(1) of the **Draft DCO (Volume 3.1) [REP1-007]** enables the Applicant to enter on to land which might be affected by the Proposed Development to undertake surveys, bring equipment onto the land and make trial holes. This power is required to ensure that there is no delay in the implementation of the Proposed Development.
DCO.1.10	Applicant	Art. 19(2) of the draft DCO [APP-013] requires for a 14 day notice to be served on every owner and occupier of land before any land is entered into or equipment placed or left on or removed from the land. Can the Applicant please explain why it believe that a 14 day notice is an appropriate timescale?	The Applicant considers a minimum of 14 days' notice of entry for surveys to be reasonable and would provide landowners with sufficient time to make any necessary arrangements. The 14-day timeframe reflects the model provisions and was also included in Article 19 of the Riverside Energy Park Order 2020. It is noted that 14 days' notice is also the statutory time period for access for surveys under s172 of the Housing and Planning Act 2016 and s53(4) of the Planning Act 2008.
DCO.1.11	Applicant	Art. 19(4) stat that "such consent must not be unreasonably withheld or delayed". Can the Applicant please provide further information regarding how it anticipates to enforce this provision?	Article 19(7) of the **Draft DCO (Volume 3.1) [REP1-007]** applies section 13 of the Compulsory Purchase Act 1965 which provides the enforcement mechanism, by way of a warrant, to enter onto the land where entry is refused. This provision could be used to obtain entry in the event that consent was unreasonably withheld or delayed. Alternatively, the Applicant could refer the matter to arbitration in accordance with Article 46 of the **Draft DCO (Volume 3.1) [REP1-007]**.
DCO.1.12	Applicant	Can the Applicant please provide a justification for the apparent overlap between Art. 19 and "enabling activities" in Art. 2 of the draft DCO [APP-013]?	The Applicant refers to its response to ExQ1 DCO.1.4. Article 19 of the **Draft DCO (Volume 3.1) [REP1-007]** provides the power to enter land to survey and investigate the land, whereas the definition of 'enabling activities' in Article 2 has been excluded from the definition of "commence" to avoid triggering the requirements within Schedule 2. For example, the requirement to prepare and obtain approval of the final landscape and ecology management plan would

ExQ1	Question to	Question	Applicant Response
			not be triggered by carrying out any surveys required to inform the final landscape and ecology management plan.
DCO.1.13	Applicant	Art. 20(1) of the draft DCO [APP-013] allows for the undertaker to carry out such protective works to any building or structure lying within the Order land as the undertaker considers necessary and expedient. Can the Applicant please explain the reasoning behind this article and why it believes that the powers sought are reasonable and proportionate?	Article 20(1) of the **Draft DCO (Volume 3.1) [REP1-007]** enables the Applicant to undertake any necessary protective works to buildings or structures that may be affected by the authorised development. Whilst protective works are not currently anticipated, including this power is considered reasonable and proportionate to ensure that the undertaker can swiftly carry out any required protective works where there are any unforeseen effects as a result of the authorised development. This Article reflects the model provisions in the Infrastructure Planning (Model Provisions) (England and Wales) Order 2009 and follows precedents in other DCOs, including Riverside Energy Park Order 2020.
DCO.1.14	Applicant	Art. 20(5) of the draft DCO [APP-013] requires for a 14 day notice to be served on the owner and occupier of the building, structure or land of its intention to exercise that power. Can the Applicant please explain why it believe that a 14 day notice is an appropriate timescale?	The Applicant considers a minimum of 14 days' notice of entry (save in the case of an emergency) to be reasonable and would provide landowners with sufficient time to make any necessary arrangements. The 14-day timeframe reflects the model provisions and was also included in Article 20 of the Riverside Energy Park Order 2020.
DCO.1.15	Applicant	Art. 22 and Art. 24 of the draft DCO [APP-013] are broadly drafted as to allow for the CA of land and rights overall all of the Order Land. Although the ExA recognises that Sch. 8 limits the CA power in defined plots to the defined rights listed in that schedule, the CA right are not limited to the plots listed in Sch 8. Can the Applicant please explain the reasoning behind this article and why it believes that the powers sought are reasonable and proportionate?	Schedule 7 to the **Draft DCO (Volume 3.1) [REP1-007]** specifies the areas of land (shown coloured blue on the **Land Plan (Volume 2.2) [REP1-004]**) in which *only* new rights may be acquired and restrictions imposed by the Applicant and the nature of the rights that may be acquired. Schedule 7 relates to Article 25(2) (previously Article 24). Article 23 (previously Article 22) provides for the compulsory acquisition of the freehold of land required for, or to facilitate or is incidental to, the authorised development. The powers in Article 23 are subject to the restrictions in Article 25 to ensure that, where relevant, the Applicant can only acquire new rights over certain plots, and cannot acquire the freehold interest in that land.

ExQ1	Question to	Question	Applicant Response
			However, Article 25(1) enables rights to be acquired over land subject to Article 23 (i.e. the land shown coloured pink land on the **Land Plan [REP1-004]**). This enables the Applicant to acquire a "lesser" interest if appropriate to do so.
DCO.1.16	Applicant	Considering the powers sought in Art. 22 and Art. 24 of the draft DCO [APP-013], does the Applicant believe that these are clearly justified in the EM or SoR?	Sections 4, 5, and 6 of the **Statement of Reasons (Volume 4.3) [APP-017]** set out the reasons why the powers are justified and Appendix A of the **Statement of Reasons (Volume 4.3) [APP-017]** provides a plot by plot explanation of why compulsory acquisition powers are sought.
DCO.1.17	Applicant	Following from EXQ1 DCO.1.14, the Applicant is asked to provide further evidence to demonstrate that persons with an interest in the Order land (and not just those with plots listed in Sch 8) were aware that undefined new rights were being sought over all of the Order land and that they were consulted on that basis.	The Applicant assumes that this question relates to pre-application consultation. The Applicant refers to its response to ISH Action Point 7 in **Written Summary of the Applicant's Oral Submissions at ISH1 (Volume 9.23) [REP1-057]** which sets out that the Applicant's intention to seek compulsory acquisition powers was clear during pre-application consultation process. In addition, the Applicant refers to Appendix B of the **Statement of Reasons (Volume 4.3) [APP-017]** which sets out how the Applicant has tried to acquire the land and rights necessary for the Proposed Development by agreement from landowners. The Applicant's approach has been compliant with the requirements of the Planning Act 2008, including associated regulations and guidance, and has followed the standard practice adopted by DCO promoters.
DCO.1.18	Applicant	Does the Applicant believe that the Draft DCO [APP-013], as it stands, accurately represents the Applicant's intentions in relation to CA, particularly in light of EXQ1 DCO.1.16?	The Applicant considers that the **Draft DCO (Volume 3.1) [REP1-007]** accurately represents its intentions in relation to compulsory acquisition, as detailed and justified in the **Statement of Reasons (Volume 4.3) [APP-017]**. The Applicant's position and approach is consistent with other energy DCOs including the powers sought in the Riverside Energy Park Order 2020.
DCO.1.19	Applicant	Can the Applicant please provide further clarification in regard to the objectives of both Art. 26 and Art. 27, the main points that	Article 27 (Private rights) (previously Article 26) of the **Draft DCO (Volume 3.1) [REP1-007]** is a model provision that (i) extinguishes private rights and restrictions over land subject to the compulsory acquisition powers contained

ExQ1	Question to	Question	Applicant Response
		distinguish one from the other and update the EM accordingly?	in Article 23 (Compulsory acquisition of land); (ii) provides that private rights and restrictions over land cease to have effect in so far as their continuance would be inconsistent with the exercise of compulsory acquisition of rights or the imposition of restrictive covenants under Article 25 (Compulsory acquisition of rights); and (iii) suspends private rights and restrictions over land so far as their continuance would be inconsistent with the exercise of temporary possession powers under the Order. This is required because it enables the undertaker to implement the authorised development without impediment. Article 27 (Power to override easements and other rights) provides that in carrying out or using the development authorised by the Order and doing anything else authorised by the Order, the undertaker may interfere with any easement, liberty, privilege, right or advantage annexed to land and affecting other land, including any natural right to support, or breach any restriction as to use of land arising by virtue of contract. It also provides that compensation may be payable under section 7 or 10 of the Compulsory Purchase Act 1965 for any such interference or breach. This is not a model provision but is added to clarify the position with regard to rights and restrictions that continue to bind the Order land (i.e. that have not been extinguished or suspended by Article 26). It has precedent, for example, in Article 19 of the Immingham Open Cycle Gas Turbine Order 2020 and Riverside Energy Park Order 2020
DCO.1.20	Applicant	The Applicant refers to S.158 of PA2008 in relation to Art. 27. This specific Section of PA2008 does not appear to readily apply to Art.27. Can the Applicant please clarify?	Section 158 of the Planning Act 2008 provides the authority to '*do anything else authorised by an order granting development consent*' for the purposes of a defence in civil proceedings in nuisance. Article 28 of the **Draft DCO (Volume 3.1) [REP1-007]** (previously Article 27) enables the undertaker to interfere with any interests or rights in carrying out the authorised development without being at risk of a claim for nuisance. However, compensation is payable under Article 28(4) of the **Draft DCO (Volume 3.1) [REP1-007]** for any such interference. Section 158 is also referred to justify the power to override easements and other rights in Riverside Energy Park Order 2020.
DCO.1.21	Applicant	Whilst the majority of the land over which TP may be taken during construction of the	Article 32 of the **Draft DCO (Volume 3.1) [REP1-007]** (previously Article 31) applies to land temporarily used for carrying out the authorised development

ExQ1	Question to	Question	Applicant Response
		Proposed Development is listed in Sch 10, Art. 31(1)(a)(ii) extends this power more broadly as well as Art. 32. Can the Applicant please explain the reasoning behind these articles and why it believes that the powers sought are reasonable and proportionate?	during the construction phase. However, Article 33 (previously Article 32) applies to land temporarily use for maintaining the authorised development, which applies during the first 5 years of the operational phase. This power is required to ensure that land can temporarily be used during construction and operation and to avoid any delays to the authorised development. As set out in paragraph 6.5.3 of the **Statement of Reasons (Volume 4.3) [APP-017]** this power is required so that temporary construction works can be carried out and then compulsory acquisition powers exercised over the land actually required for the permanent elements of the Proposed Development. This would ensure that the permanent land and rights acquired are over the minimum amount of land necessary for the Proposed Development. Both Articles 32 and 33 have clear limits on the length of time that the land can be used in this way and are designed to minimise the compulsory acquisition of permanent land and rights, ensuring that they are reasonable and proportionate.
DCO.1.22	Applicant	Following from EXQ1 DCO.1.20 the Applicant is asked to provide further evidence to demonstrate that persons with an interest in the Order land (and not just those with plots listed in Sch 10) were aware that TP rights, as set out in Art. 31 and Art. 32, were being sought over all of the Order land and that they were consulted on that basis.	The Applicant assumes that this question relates to pre-application consultation. The section 48 notice sent to section 42 consultees and published in local newspapers included a reference to powers for the temporary use of land being sought as part of the Proposed Development (see **Appendix I to the Consultation Report (Volume 5.1) [APP-020]**). In addition, the Applicant refers to Appendix B of the **Statement of Reasons (Volume 4.3) [APP-017]** which sets out how the Applicant has tried to acquire the land and rights, including the temporary use of land for construction, necessary for the Proposed Development by agreement from landowners. The Applicant's approach has been compliant with the requirements of the Planning Act 2008, including associated regulations and guidance, and has followed the standard practice adopted by DCO promoters.
DCO.1.23	Applicant	Can the Applicant please provide further clarification in regard to the objectives of both	The Applicant refers to its response to ExQ1 DCO.1.21 as to why temporary use powers are required over all of the Order land.

ExQ1	Question to	Question	Applicant Response
		Art. 31(9)(a)(b) and update the EM accordingly?	The wording in Article 32(9) of the **Draft DCO (Volume 3.1) [REP1-007]** (previously Article 31(9)) clarifies that exercising the power for the temporary use of land for carrying out the Proposed Development pursuant to this Article does not preclude the creation or acquisition of new rights, imposition of restrictions or acquisition of rights in the subsoil of any part of the Order land. This explanation is provided within the **Explanatory Memorandum (Volume 3.2) [APP-014]** and the Applicant therefore considers that no further amendments are required.
DCO.1.24	Applicant	Can the Applicant please provide confirmation of engagement with the discharging authorities in relation to Sch 2 (Requirements) of the Draft DCO [APP-013] as per Advice Note 15: Drafting Development Consent Orders[2]?	The Applicant has been engaging with the relevant planning authorities, in accordance with Advice Note 15, and discussions are ongoing in respect of a SoCG.
DCO.1.25	Applicant	Sch 14 (Maximum Design Parameters) provides for maximum parameters for certain elements of the authorised development. Nevertheless, minimum parameters or limits of deviation from the maximum parameters included in Sch 14 are not part of the draft DCO. Can the Applicant justify this approach or explain why it believes that the minimum standards or appropriate levels of deviation should not be included?	The Environmental Statement was undertaken based on a reasonable worst case parameter for each given topic, to ensure a precautionary approach to assessment. The reasonable worst cast parameters have been captured within the 'Rochdale Envelope' of the Proposed Development. The Applicant refers to its response to ExAQ1 GCT.1.6 and will update Schedule 14 of the **Draft DCO (Volume 3.1) [REP1-007**] to include the relevant minimum parameters for the chimney stacks.
DCO.1.26	Applicant	Sch 11 (Protective Provisions) protects the interests of certain statutory undertakers. What engagement, if any, has there been with the relevant statutory undertaker? And how have any concerns been addressed?	The Applicant has engaged with each relevant statutory undertaker with apparatus or an interest in the Order Land. A summary of the current status of negotiations has been submitted at Deadline 2.

ExQ1	Question to	Question	Applicant Response
DCO.1.27	Applicant Cambs CC HLAs	Sch 6 (Access) includes a series of tables that detail those part of the access to be maintained at the public expense, by the street authority and those works to restore the temporary accesses which will be maintained by the street authority. Do the HLAs, particularly the highways authority, agree with this approach and do they have any other comments to make on this Sch?	The Applicant has been in regular discussions with Cambridgeshire County Council from the inception of the project and is entering into negotiations regarding a section 278 agreement, with the aim of reaching agreement before the end of the Examination. Heads of Terms for the Section 278 Agreement are currently being negotiated with Cambridgeshire County Council.
DCO.1.28	Applicant	Assuming that CA is granted for Algores Way, as proposed at the moment, the Applicant please provide confirmation how it proposes public access is be secured along Algores Way past Britannia Way and how this will be reflected within the DCO? During and after construction period?	The Applicant refers to its Deadline 1 submissions and notes that it is no longer seeking to acquire the freehold of the unadopted section of Algores Way (see the Applicant's response to ISH Action Points 6, 7 and 8 in **Written Summary of the Applicant's Oral Submissions at ISH1 (Volume 9.23) [REP1-057]).** It is noted that this section of Algores Way is a private access.

Table 2.8 Environmental Statement

ExQ1	Question to	Question	Applicant Response
EIA.1.1	Applicant	The ES does not provide details of any utilities which may require diversion, such as gas pipelines. Can the Applicant confirm whether the Proposed Development will require stopping up/diversion of any existing utilities and any associated impacts and effects of such works?	The Applicant has identified a list of statutory undertakers whose apparatus may be affected as a result of the Proposed Development. The Applicant has entered into discussions with each of the Statutory Undertakers and is in negotiations regarding protective provisions and side agreements. The Applicant is confident that agreement can be reached during the Examination.
EIA.1.2	Applicant Environment Agency (EA)	The ES is reliant in numerous aspect chapters on the proposed Environmental Permits (EP) for the delivery of the Proposed Development. The EPs have not yet been agreed with the EA. The existing permits have also not been submitted to the Examination at present. Please can an update be provided as to the stage of the Environmental Permits.	The Environmental Permit for the EfW CHP Facility was submitted to the Environmental Agency and is currently undergoing Duly Made checks. Once the Duly Made checks are complete the Environment Agency will commence its examination of the submitted documents.
EIA.1.3	Applicant	Can the Applicant provide further details regarding the content of the water quality monitoring programme or provide a draft of the document to the Examination?	A water quality monitoring programme for the discharge of uncontaminated surface water runoff from the Proposed Development into the local drains will be implemented during construction and operation phases to ensure that the measures taken to protect the surface water environment are effective. Details of the water quality monitoring programme will be developed and agreed with the Environment Agency and are likely to include regular monitoring of pH, suspended solids and visible oil/grease against agreed emission limits. The water quality monitoring programme for the construction phase will be agreed before construction at detailed design and will be set out in the Construction Environmental Management Plan (in line with Rev 2 of the **Outline Construction Environmental Management Plan (Volume 7.12) [REP1-024])** Sections 3.5.1 to 3.5.4, which is secured in Requirement 10 of the **Draft DCO (Volume 3.1) [REP1-007].** The water quality monitoring programme for the operational phase will be agreed at detailed design and will be secured as part of the Environmental Permitting process.

ExQ1	Question to	Question	Applicant Response
EIA.1.4	Applicant	Can the Applicant provide details of any remediation measures which may be required if monitoring identifies any issues which are identified?	As set out in Table 3.1 and Section 4.3 of Rev 2 of the **Outline Drainage Strategy (Volume 6.4, Appendix 12F of the ES) [REP1-017],** the drainage system will have an emergency shut-off valve to prohibit the discharge of contaminated/potentially contaminated water into the Internal Drainage Board (IDB) drains in the event of an emergency, such as a fire event or major spillage, or if the water quality monitoring of the surface runoff discharge identifies any issues. As set out in Table 3.1 of the **Outline Drainage Strategy (Volume 6.4, Appendix 12F of the ES) [REP1-017],** contaminated water will be retained in the SuDS and underground tanks before appropriate disposal, e.g., tankering off-site. Actions will be put in place to identify, and if required, address the causes of contamination in line with Accident Response Protocol. The **Outline Drainage Strategy (Volume 6.4, Appendix 12F of the ES) [REP1-017]** is secured in Requirement 8 of the **Draft DCO (Volume 3.1) [REP1-007].**
EIA.1.5	Applicant EA	The base configuration was a chimney 3m above the level of the tallest building, this being the minimum requirement of the EA's D1 guidance note. Therefore the assessment parameters ranged between 53m – 150m. The worst case scenario height is considered to be 84m and the limit of deviation is a height of up to 90m. Taking in to account the EA's guidance, the chimney height which has been identified as corresponding to best Available Techniques (BAT) and has been used to model impact of chimney emissions in this assessment is 84m (this is considered a worst case scenario recognising that the Applicant's vertical Limits of Deviation (LoD) includes for chimneys up to 90m in height). Can the Applicant explain why 84m was considered	Revision 3 of **ES Chapter 8 Air Quality Appendix 8B Air Quality Technical Report (Volume 6.4)** (submitted at Deadline 3) Section 6 Chimney Height Assessment explains the methodology used to ascertain the chimney height which would correspond with BAT. Through the use of dispersion modelling, a chimney height assessment graph is produced which considers long and short-term NO_2 impacts on human receptors (Graphic 8B6.1 and 8B6.2). This identifies a height of 84m at which there would be no exceedance of NO_2 air quality standards in the long-term and 75m at the short-term. 84m is therefore considered a worst case scenario in that it is the minimum height to ensure neither long or short-term exceedances but whilst acceptable it allows for less pollutant dispersion than the height of 90m that is allowed for in the Limits of Deviation (LoD). This is why 84m was used in the air quality assessment. A chimney height of 84m is not worst case for visual impact. The 90m chimneys which being taller would be of greater visual prominence, were assessed in the LVIA and illustrated on the photomontages and ZTV.

ExQ1	Question to	Question	Applicant Response
		to the worst case scenario, both in terms of visual impact and emissions?	

Table 2.9 Flood Risk, Drainage and Water Environment

ExQ1	Question to	Question	Applicant Response
WE.1.1	Applicant	Figure 3.11i CHP Facility Temporary Construction Compound Layout: Phase 1 [APP-049] shows three surface water storage ponds but these do not appear to be shown on any supporting plans for Chapter 12 of the ES [APP-064]. These do not appear to be included within the draft DCO. Can the Applicant update the draft DCO if necessary to include all surface water storage ponds which are required for the Proposed Development? Can the Applicant confirm that the surface water drainage strategy has been approved with the relevant flood authority? If not, what confidence is there that the surface water can be appropriately managed and will not pose a risk to the new infrastructure or to existing sites and interests elsewhere?	<u>Drainage layout figures</u> The three surface water storage ponds are shown in Figures 4.1 and 4.2 of the **Outline Drainage Strategy (Volume 6.4, Appendix 12F of the ES) [REP1-017].** The Outline Drainage Strategy is secured in Requirement **8 of the Draft DCO (Volume 3.1) [REP1-007].** <u>Approval of Outline Drainage Strategy</u> The content of the **Outline Drainage Strategy (Volume 6.4, Appendix 12F of the ES) [REP1-017]** has been subject to extensive consultation and agreement on its principles have been undertaken with the LLFAS (CCC and NCC) and the IDBs (KLIDB and HWIDB) during the pre-application phase and remains ongoing following the submission of the DCO application. A summary of the consultation undertaken to date is provided in the **Outline Drainage Strategy (Volume 6.4, Appendix 12F of the ES) [REP1-017]**. Discussions and agreement to date have included discharge rates and locations, storage attenuation requirements and modelled climate change allowances, and water treatment requirements. The need for infiltration at Walsoken Substation will be subject to further investigation undertaken prior to construction, through consultation with NCC and KLIDB and by undertaking a soakaway testing exercise. This agreed approach is set out in the **Outline Drainage Strategy (Volume 6.4, Appendix 12F of the ES) [REP1-017].** The agreements reached to date are also set out in the relevant Statements of Common Ground (SoCGs) with the LLFAS (CCC and NCC)) **(Volume 9.4) [REP1-038]** and the IDBs (KLIDB **(Volume 9.14) [REP1-048]** and HWIDB **(Volume 9.13) [REP1-047]**). The Applicant submitted Rev 2 of the **Outline Drainage Strategy (Volume 6.4, Appendix 12F of the ES) [REP1-017]** at Deadline 1. The Applicant awaits comments on the updated Strategy at Deadline 2, and will confirm in future SoCG updates with the LLFAS (CCC and NCC) **(Volume 9.4) [REP1-038]** and the IDBs (KLIDB **(Volume 9.14) [REP1-048]** and HWIDB **(Volume 9.13) [REP1-047]),** the extent to which agreement on the surface water drainage

ExQ1	Question to	Question	Applicant Response
			strategy has been reached. At this stage, the Applicant is confident that agreement can be reached during the Examination.
WE.1.2	Applicant	Can the Applicant please provide further information in relation to how flood risk informed the development of the proposal and how it has considered flood risk as part of alternatives?	<u>How flood risk informed the development of the proposal</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 (details provided in **Appendix 12B of the ES (Stakeholder Engagement) of the ES (Volume 6.2) [APP-085]** and **EA SoCG (Volume 9.7) [REP1-041]).** Design 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). <u>How flood risk was considered as part of assessment of alternative locations</u> The Applicant's consideration of alternative locations in the context of the sequential test is set out within the **FRA (ES Chapter 12 Hydrology, Appendix 12A FRA (Volume 6.4) [APP-084]** and summarised within the **Planning Statement (Volume 7.1) [APP-091].** 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

ExQ1	Question to	Question	Applicant Response
			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 as 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 **FRA (Appendix 12A FRA Volume 6.4 [APP-084]**) records that the WMA which is located approximately 0.5km to the east of the EfW CHP Facility is too small to accommodate the EfW CHP Facility of the type and size proposed (3.5ha). The other WMA is located approximately 2.5km to the north and

ExQ1	Question to	Question	Applicant Response
			alongside the River Nene and is close to residential areas and does not benefit from proximity to larger users of heat. 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. <u>Site layout</u> Having applied the sequential test, the Applicant followed a sequential approach at the site level, consistent with NPS EN-1 paragraph 5.7.9, with the EA with the identification on compatible and non-compatible uses within the relevant flood zones. The definition of such uses was agreed with the EA at a meeting on 28/4/21 and with CCC on 26 October 2021. Essential infrastructure elements of the EfW CGHP Facility, CHP Connection and Grid Connection were required to pass the Exception Test. The Exception Test assessment is presented in **FRA (Appendix 12A FRA Volume 6.4 [APP-084]**) and provides further detail at Section 7.2 which demonstrates that the Proposed Development would be safe, without increasing flood risk elsewhere and, where possible, would reduce flood risk overall. It also demonstrates how the Essential Infrastructure located in Flood Zone 3a has been designed and constructed to remain operational and safe in times of flood.
WE.1.3	Applicant	The Proposed Development will use water in order to produce steam as part of its energy production. Cam (sic) the Applicant please confirm how it proposes water to be treated to remove pollutants as to not negatively impact nearby water bodies or land?	There will be no discharges of process effluents from the EfW Facility into the IDB drains. The only discharge into IDB drains is of uncontaminated surface runoff in line with Section 4.3 of Rev 2 of the **Outline Drainage Strategy (Volume 6.4, Appendix 12F of the ES) [REP1-017].** During normal operation, process effluents (including any effluent generated during steam production) will be reused within the process. In the event that there are excess effluents generated which cannot be re-used within the process, they will be discharged to foul sewer in compliance with a Trade Effluent consent obtained from Anglian Water or be tankered off-site for treatment in a suitably licensed facility. Any constraints on the quality of effluent to be discharged to foul sewer

ExQ1	Question to	Question	Applicant Response
			to be imposed by Anglian Water through the Trade Effluent will be confirmed to the Environment Agency prior to commencement of operations. The approach to foul (trade) effluent discharge was discussed at a meeting held with Anglian Water on 13/03/2023. Anglian Water confirmed they would re-model the Applicant's requirements to confirm the capacity of the network. An update on agreements reached with Anglian Water will be presented in a Technical Note and updated Statement of Common Ground at Deadline 3. Domestic effluent from welfare facilities will be discharged to foul sewer.

Table 2.10 Geology and Land Use

ExQ1	Question to	Question	Applicant Response
GLU.1.1	Applicant	Table 13.9 of Chapter 13 of the ES [APP-040] states that a walkover survey for desk study was completed October 2019, with ground investigation completed during February and March 2020. It is noted that further Phase 2 ground investigation works are due to be carried out. Can the Applicant confirm what further ground investigation works have been carried out and report findings to the Examination?	No further ground investigation works have been undertaken at this stage. The Applicant is committed to carrying out Phase 2 ground investigation during pre-construction based upon the findings of the Phase 1 geoenvironmental desk studies (**Chapter 13 Geology, Hydrogeology and Contaminated Land Appendices 13A and 13B) (Volume 6.4) [APP-087].** This phased approach to site investigation to assess land contamination is in accordance with the UK Government, Land Contamination Risk Management (LCRM), 2020. Compliance with LCRM is a requirement in the **Outline CEMP (Volume 7.12) [REP1-024],** which is secured in Requirement 10 of **the Draft DCO (Volume 3.1) [REP1-007].**
GLU.1.2	Applicant	The Proposed Development is located in close proximity to agricultural land. Can the Applicant please clarify how it has accessed its impact on nearby agricultural land?	The Proposed Development does not require temporary or permanent disturbance to soils in agricultural use and all elements of the Proposed Development are located in brownfield land, as such effects on soils and agricultural land were scoped out of the assessment, as stated in **Table 13.14, ES Chapter 13 Geology, Hydrogeology and Contaminated Land (Volume 6.2) [APP-040]**. PINS agreed in the Scoping Opinion that impacts on soil resources could be scoped out for the EfW CHP Facility site. This is detailed in **Table 13.1, ES Chapter 13 Geology, Hydrogeology and Contaminated Land (Volume 6.2) [APP-040]** which also explains the rationale for scoping out effects on soil resources for all project elements. **ES Chapter 13 Geology, Hydrogeology and Contaminated Land (Volume 6.2) [APP-040]** considers the potential for the Proposed Development to impact on nearby land due to contaminants in or on the land that could potentially migrate through the soil profile, as surface run-off, or in groundwater, onto adjacent land (including agricultural land). The assessment in the **ES Chapter 13 Geology, Hydrogeology and Contaminated Land (Volume 6.2) [APP-040]** of potential effects on receptors due to land contamination is supported by a Phase 1 Geo-environmental desk study for the Grid Connection, CHP Connection and Access Improvements, and a Phase 1 Geo-environmental desk study and

ExQ1	Question to	Question	Applicant Response
			Phase 2 intrusive ground investigation of the EfW CHP Facility Site, included as **Chapter 13 Geology, Hydrogeology and Contaminated Land Appendices 13A and 13B (Volume 6.4) [APP-087]**. No existing potential contamination sources were identified within the EfW CHP Facility Site with potential to affect offsite land quality. The Phase 1 geo-environmental desk studies for all elements of the Proposed Development confirm that the CHP Connection Corridor and Access Improvements are located on brownfield land where some localised contamination may be present in soils and groundwater. The risk of such contamination becoming mobilised during construction such that it could migrate onto other areas of land is mitigated through the embedded environmental measures detailed in **Table 13.23**, **ES Chapter 13 Geology, Hydrogeology and Contaminated Land (Volume 6.2) [APP-040]**. These include ground investigation to be undertaken during the pre-construction phase to check for the presence of contamination in areas not investigated to date, but which have been identified in the Phase 1s as being potentially contaminated. Following completion of the Phase 2 ground investigation, appropriate risk assessment will be completed in accordance with UK Government, Land Contamination Risk Management (LCRM), 2020. Handling of materials excavated during construction will be in accordance with the Construction (Design and Management) Regulations 2015 (CDM 2015), the Control of Asbestos Regulations 2012 (CAR 2012), and a Materials Management Plan (MMP) which ensures that excavated non-waste materials will be reused in line with CL:AIRE (2011) The Definition of Waste: Development Industry Code of Practice (DoWCoP), and best practice air quality management measures will be applied as described in Institute of Air Quality Management (IAQM) (2014) guidance on the Assessment of Dust from Demolition and Construction 2014, version 1.1. The use of an MMP to ensure that all placed soils / materials are suitable for use and the operational controls that will be applied within the EfW CHP Facility Site mean that there should be no releases to ground as a result of the Proposed Development that would have potential to result in impacts on agricultural land quality.

Table 2.11 Historic Environment

ExQ1	Question to	Question	Applicant Response
HE.1.1	Applicant	Please provide lower resolution versions of the figures that make up APP-010 as these are quick (sic) large and not suitable for a virtual environment.	A low resolution version of **Statutory and Non-Statutory Features of Historic Environment** (**Volume 2.6) [APP-010]** has been created and is submitted at Deadline 2.
HE.1.2	Applicant	Para 10.6.10 of Chapter 10 of the ES [APP-037] states, as Bowthorpe Conservation Area overlays with the ZTV (Zone of Theoretical Visibility) that some theoretical visibility of the upper part of the chimneys from within the southern part of Wisbech Park, within an area occupied by sports pitches could occur. The Applicant goes on to say that: "However, at a distance of 2-2.5km, this would not affect the historic character of this part of the conservation area as an open recreation ground, enclosed along its edge by a line of mature park trees." Could the Applicant provide further information on how it arrived to this conclusion and what work has been carried out in order to assess the impact of the Proposed Development on Bowthorpe Conservation Area, particularly the area that overlays with the ZTV?	Effects on the setting of Bowthorpe Conservation Area were not assessed in detail in the ES as it was not considered that there was a potential for a significant effect on this asset, for the reasons described in paragraph 10.6.10 of **ES Chapter 10 Historic Environment (Volume 6.2) [APP-037]**. The list of heritage assets to be included in the assessment of effects on setting as part of the ES was shared with the host authorities at a meeting on 23 March 2021. Bowthorpe Conservation Area comprises the full extent of Wisbech Park, along with areas of mostly later Victorian housing which became established following the purchase of the land for the park in 1869. The Wisbech Park is comprised of two distinct parts. The northern half comprises the 'formal' part and is well wooded with a range of mature specimen trees, a network of paths and two listed buildings, a Memorial to Richard Young (LB1331618) and a Band stand (LB1126649). The southern part comprises the recreation grounds, with a play area and various sports pitches. The boundary of the park is marked by a border of mature trees, particularly on the eastern and southern sides, and there are no formal designed views within or from the park, other than that the memorial and band stand form focal points within the northern part of the park. There is no conservation area appraisal for Bowthorpe, though it appears to be of historical interest as an area of later Victorian residential development alongside a formal park and recreation ground. The park is not designated in its own right, but in the in the context of the heritage interest of the conservation area the northern part of the park is the more sensitive part, being characterised by a more formal layout and also providing the setting for the

ExQ1	Question to	Question	Applicant Response
			focal points of the band stand and the memorial. In contrast, the southern part of the park is less sensitive part, being occupied by a range of sport pitches. The ZTV (**Figure 10.5 Wisbech Conservation Area ES Chapter 10 Historic Environment Figures (Volume 6.3) [APP-062])** identifies theoretical visibility of the chimney from the southern part of the park. However, in reality, the mature trees on the edge of the park would be likely to screen or filter much of this, as illustrated in the photowire view from VP11 (**Figure 9.27b Viewpoint 11, ES Chapter 9, Landscape and Visual Figures 9.17 – 9.24 (Volume 6.3) [APP-058**]). Even where not entirely screened, a glimpsed view of a chimney at a distance of 2-2.5km would have no effect on the conservation area. There are no designed or other views looking out from within the park which contribute to the significance of the conservation area, though as an urban park there is an expectation of 'urban' features being visible from within the park, including buildings and structures of residential, hospital, commercial and industrial use. There will be no effect on the northern part of the park, on an appreciation of the existing focal points provided by the band stand and the memorial and on its relationship to the surrounding residential streets which make up the conservation area.
HE.1.3	Applicant	Para 10.9.36 of Chapter 10 of the ES [APP-037] states that there will be visibility of the EfW CHP Facility from a group of listed buildings comprising the Elgoods Brewery Site and that a photomontage from this point has been included as Figure 9.23a & b of Landscape and Visual Figures 9.17 to 9.24 [APP-058]. Can the Applicant please provide further information of how it has arrived to its assessment of impact being Minor (not significant) as set out in Table 10.17 Summary of significance of adverse historic environment effects included in Chapter 10 of the ES [APP-037]?	As noted in section 10.9.43 of **ES Chapter 10 Historic Environment (Volume 6.2) [APP-037]** the Wisbech Conservation Area Appraisal notes the open nature of this part of the conservation area and it also characterises Elgoods Brewery as the first large structure entering the town of Wisbech along the North Brink. It is identified as a landmark building as viewed from South Brink looking north, in which view it is seen as marking the 'edge' of the range of buildings extending along North Brink to the north and east. The setting of Elgoods Brewery contributes to its significance through its position within The Brinks character area, as a commercial element within the Georgian and Victorian streetscape and a landmark building in views from the south and looking along North Brink toward the town centre. Views outward to the south and southeast take in a contrasting environment defined, in part, by the River Nene and by the mix of industrial uses, the low-lying residential edge of Wisbech and tree cover. This gives a general impression of more

ExQ1	Question to	Question	Applicant Response
			open views in contrast to the town centre but is clearly of a different character and views into this area do not make a notable contribution to the significance of Elgoods Brewery, The Brinks character area or the conservation area as a whole. The photomontage location was requested by Historic England (email dated 1 December 2021 and subsequent telephone call to agree the additional illustration to be included following PEIR response, as referenced in SoCG). Photomontage locations were also agreed with the host authorities is set out in Appendix 9A Volume 6.4 ES Chapter 9 Landscape and Visual Appendices [APP-079]. The photomontage from VP7 (Elgoods Brewery) was requested by Historic England as a location at the edge of the conservation area with a more open outward than is typical from within the conservation area, and from which the Proposed Development would be visible. The open character along the river contributes to the historic character of this area (though will not be affected) but views across the Purina factory, other industrial structures and 20th century residential area from this part of the conservation do not notably contribute to the significance of the Wisbech Conservation Area. Therefore, an incremental change, introducing some visibility of new industrial structures within a view which already contains industrial buildings and which makes only a very limited contribution to the significance of The Brinks character area or the conservation area as a whole will not result in a significant effect.
HE.1.4	Applicant	Para 10.9.36 of Chapter 10 of the ES [APP-037] states There will also be visibility of the EfW CHP Facility from a more extensive area along the southern extent of South Brink. Could the applicant confirm if any photomontages of this view have been submitted?	Consultation was undertaken with Historic England following submission of the PEIR and with regard to photomontages from within Wisbech Conservation Area, one photomontage was requested from the Elgood's Brewery (email dated 1 December 2021 and subsequent telephone call to agree the additional illustration to be included following PEIR response, as referenced in SoCG), which was provided (**Figure 9.23b Viewpoint 7, ES Chapter 9 Landscape and Visual Figures 9.17 – 9.24 (Volume 6.3) [APP-058]).** No photomontage was requested from the southern extent of South Brink.

ExQ1	Question to	Question	Applicant Response
			The ZTV (**Figure 10.5 Wisbech Conservation Area ES Chapter 10 Historic Environment Figures (Volume 6.3) [APP-062]**) illustrates the extent of theoretical visibility of the upper part of the main building of the EfW CHP Facility and the chimney, showing an area with predicted visibility along the South Brink, south of Coalwharf Road. There are no other heritage assets in this area and it is an area that is dominated by the adjoining Purina factory. This is not a sensitive part of the conservation area and outward views from this location do not make any contribution to the heritage significance of the asset, so it was not considered that a photomontage would be helpful.
HE.1.5	Applicant	Para 10.9.41 of Chapter 10 of the ES [APP-037] states that there would be limited visibility of chimneys and the upper Sections of the tallest EfW CHP Facility buildings. Considering the size and overall volume of facility, could the Applicant provide further information on what is considers "limited visibility", particularly in relation to heritage assets?	The ZTV (**Figure 10.5 Wisbech Conservation Area ES Chapter 10 Historic Environment Figures (Volume 6.3) [APP-062]**) illustrates the extent of theoretical visibility of the Proposed Development from within Wisbech Conservation Area. This shows that across most of the conservation area the extent of visibility of the tallest elements of the Proposed Development would be limited in extent and highly fragmented within the tightly enclosed spaces of the town centre. This is illustrated in the photomontage from the northern end of North Brink at the Grade I listed Peckover House (**Figure 9.26b Viewpoint 10, ES Chapter 9 Landscape and Visual Figures 9.25 – 9.32 (Volume 6.3) [APP-058])** in which the EfW CHP Facility buildings would not be visible.
HE.1.6	Applicant Fenland DC	Para 10.9.41 of Chapter 10 of the ES [APP-037] states that, in the context of the Wishbech (sic) Conservation Area, the visibility of the chimneys and the upper Sections of the tallest EfW CHP Facility buildings would be greatest from the southern part of The Brinks character area. • Could the Applicant please provide further information regarding how visible the the (sic) chimneys and the upper Sections of the tallest EfW CHP Facility buildings would from the Binks character area and	The photomontage from Elgoods Brewery (**Figure 9.23b Viewpoint 7, ES Chapter 9 Landscape and Visual Figures 9.17 – 9.24 (Volume 6.3) [APP-058**]) illustrates the greatest degree of visibility from within Wisbech Conservation Area. This degree of visibility would be experienced from a small Section of North Brink directly outside of the brewery, and before the road turns north to the junction with Barton Road. There would be much less visibility of the Proposed Development from further north along North Brink, as illustrated in the photomontage from the northern end of North Brink at Peckover House (**Figure 9.26b Viewpoint 10 ES Chapter 9 Landscape and Visual Figures 9.25 – 9.32 (Volume 6.3) [APP-058]**) in which the EfW CHP Facility buildings would not be visible.

ExQ1	Question to	Question	Applicant Response
		why it believes its impact will be "not significant"? • Could Fenland DC please also comment?	The reasons for drawing the conclusion that the impact will be "not significant" are explained in the reply to Question HE.1.3.
HE.1.8	Applicant	Para 10.9.41 of Chapter 10 of the ES [APP-037] states that the identified limited visibility of the chimneys and upper Sections of the main building at the EfW CHP Facility would be in the context of existing large scale industrial and logistic buildings in the intervening space. Can the Applicant please provide further justification of why it believe that further industrial development, even if in the context of existing other large scale industrial and logistic buildings, would not be significant?	Assessment of effects on setting is undertaken with reference to Historic England guidance (Historic England 2017, The Setting of Heritage Assets, see Table 10.6 of **Chapter 10 of the ES (Volume 6.2) [APP-037]).** This provides guidance on identifying elements of the setting of an asset which make a contribution to its significance (Step 2) and how a proposed development may affect these (Step 3). Identifying elements of a setting which contribute to significance of an asset starts with the character of the heritage asset itself, which in the case of The Brinks is largely of a Georgian and Victorian streetscape with some elements of its commercial past. The later 20th century industrial and logistics buildings which are present south of The Brinks and the town centre and in which the Proposed Development would be located is clearly of a different character and views into this area do not make a notable contribution to the significance of The Brinks character area or the conservation area as a whole. In considering how a proposed development may affect an asset, the guidance identifies that the location, form and appearance are a factor, as well as any changes to general character and clearly, it is not possible for a development to have the effect of 'industrialising' an already industrial area. The photomontage (**Figure 9.23b Viewpoint 7 ES Chapter 9 Landscape and Visual Figures 9.17 – 9.24 (Volume 6.3) [APP-058])** location was selected and agreed (email dated 1 December 2021 and subsequent telephone call to agree the additional illustration to be included following PEIR response, as referenced in SoCG) as a location at the edge of the conservation area with a more open outward than is typical from within the Wisbech Conservation Area, and from which the Proposed Development would be visible. The open character along the river contributes to the historic character of this area (though will not be affected) but views across the Purina factory, other industrial structures and 20th century residential area from this part of the

ExQ1	Question to	Question	Applicant Response
			conservation do not notably contribute to the significance of the Wisbech Conservation Area. Therefore, an incremental change, introducing some visibility of new industrial structures within a view which already contains industrial buildings, and which makes only a very limited contribution to the significance of The Brinks character area or the conservation area as a whole will not result in a significant effect, as described in paragraphs 10.9.41-10.9.44 of **Chapter 10 of the ES (Volume 6.2) [APP-037])**.
HE.1.9	Applicant	Para 10.9.51 of Chapter 10 of the ES [APP-037] states, in relation to Elm Conservation Area, that would be very limited visibility of the EfW CHP Facility from within the conservation area. Can the Applicant confirm that this would also be case for the Church of All Saints Grade I Listed Building, located within Elm Conservation Area, particularly in relation to views from the building and of the building from key viewing corridors and also confirm how the impact of the Proposed Development on the Church of All Saints Listed Building has been carried out?	The theoretical visibility of the Proposed Development is illustrated on **ES Figure 10.6 Elm Conservation Area (ES Chapter 10 Historic Environment Figures (Volume 6.3) [APP-062]).** As described in ES paragraph 10.9.48 (Volume 6.2 ES Chapter 10 Historic Environment [APP-037]) the Grade I Listed Church of All Saints (LB1331971) occupies a central location within Elm Conservation and the 'limited visibility' can be seen to the case for this building. The church is located within a churchyard which is enclosed by mature trees and this further limits any outward views from this location. The ground within the churchyard also slopes down somewhat from the boundary wall alongside Main Road and so from the church itself, outward views are further restricted. The church is not particularly prominent within the village and is mainly seen in relatively close views around the junction between Main Road and Begdale Road, framed along the streets leading toward the church. The Elm Conservation Area appraisal correctly identifies a key view looking southwest along Main Road toward the church. There would be no visibility of the Proposed Development from within this view. The church can also be seen in relatively close views looking north from Main Road, east from Begdale Road and in association with the Grade II Listed War Memorial (LB1331969). There would be no visibility of the Proposed Development from within these views and so as described in ES paragraphs 10.9.54-10.9.56 (**ES Chapter 10 Historic Environment (Volume 6.2) [APP-037])** the effect on this asset will not be significant.

ExQ1	Question to	Question	Applicant Response
HE.1.10	Applicant	Considering that the PA2008 requires that, in considering the impact of a proposed development on heritage assets, decision-makers should have regard to the desirability of preserving the asset or its setting, including considering any harm or loss that may result from the development, can the Applicant please provide further justification of why it believes that the impact of the proposal on identified heritage assets is not significant?	The responses to questions HE.1.2-9 have addressed the specific questions on the heritage assets identified in the individual questions. This has included further justification where required in order to answer the specific questions. **ES Chapter 10 Historic Environment (Volume 6.2) [APP-037**] confirms that there would be no significant effects on heritage assets as a result of the Proposed Development.

Table 2.12 Landscape and Visual

ExQ1	Question to	Question	Applicant Response
LV.1.1	Applicant	There will be no requirement for visible aviation lighting on the chimneys as confirmed by the Defence Infrastructure Organisation (email dated 05/05/2021). Can the Applicant provide a copy of the communication from the Defence Infrastructure Organisation dated 05/05/2021 stating they do not consider that visible aviation lighting on chimneys is required?	The communication between the Applicant and the Defence Infrastructure Organisation, dated 05 May 2021 is enclosed as **Appendix 10.2D of ExA's Written Questions (ExQ1) – Appendices (Volume 10.2).**
LV.1.2	Applicant	Para 9.10.4 of Chapter 9 of the ES [APP-036] states that no additional mitigation measures are proposed at this stage to further reduce the landscape and visual effects identified in this chapter because all relevant and implementable measures have been embedded into the development proposal. Can the Applicant please clarify what additional measures were considered and why these were deemed to not relevant or not implementable, particularly considering that likely significant effects remain?	No additional measures have been considered and all measures that are relevant and implementable have been embedded into the Proposed Development as set out in **Tables 9.12** and **9.19** of **ES Chapter 9 Landscape and Visual (Volume 6.2) [APP-036]**. It is inevitable that some significant landscape and visual effects would remain given the scale of the Proposed Development which is not unusual for an EfW power station. Other forms of development located in the Study Area have resulted in significant landscape and visual effects that cannot be fully mitigated including wind farms (Ransonmoor, Coldham/Coldham Extension Stags Holt and Grange Wind Farms) and 400Kv pylons. Mature trees typically reach heights of 15-20m and consequently planting within the Order Limits would not eliminate views of the upper parts of the EfW CHP Facility buildings or the chimneys, and this new built form is predicted to have localised long-term significant landscape and visual effects as concluded in Section 9.12 of **ES Chapter 9 Landscape and Visual (Volume 6.2) [APP-036].** The **Design and Access Statement (Volume 7.5) [APP-096]** documents the design process and the options considered, adopted and dismissed in terms of mass, scale, roof profile and cladding materials to minimise the visual impact of the EfW CHP Facility building.

ExQ1	Question to	Question	Applicant Response
			Table 9.19 of **ES Chapter 9 Landscape and Visual (Volume 6.2) [APP-036]** describes the landscape and visual environmental measures embedded within the Proposed Development which would be implemented through Requirements 2, 4, 5, 18 and 19 of the **Draft DCO (Volume 3.1) [REP1-007].** The proposed 3m acoustic fence which would provide some partial screening (see LV.1.5), would be implemented through Requirement 19 **of the Draft DCO (Volume 3.1) [REP1-007].**
LV.1.3	Applicant	Table 9.16 Summary of significance of adverse effects: residential and community visual Receptors, included in Chapter 9 of the ES [APP-036] includes a series of Residential Properties within 500m of the main building at the EfW CHP Facility. Instead of relying on Appendix 9K, the ExA requests that a new figure is produced that shows, in one page, the location of all of the Residential Properties within the 500m boundary in relation to the Proposed Development.	Figure 2.1 of **Appendix 9K** (**ES Chapter 9 Landscape and Visual Appendices (Volume 6.4) [APP-079]**), which shows the location of all of the Residential Properties within the 500m boundary in relation to the Proposed Development, was omitted in error as part of the DCO submission. The Landscape and Visual Appendices have been resubmitted at Deadline 2 and include Figure 2.1 of Appendix 9K as well as other omitted figures for Appendix 9D (Figures 1.1, 2.1, 3.1 and 3.2) and Appendix 9L (Figures 2.1 to 2.18).
LV.1.4	Applicant	Table 9.16 Summary of significance of adverse effects: residential and community visual Receptors, included in Chapter 9 of the ES [APP-036] states, in relation to "Group of southern properties on New Drove" and "Group of southern properties on Cox Close and Ellerby Drive" that impacts of the Construction and Operation phases and Not Significant, with the significance being Minor at Construction Phase and Moderate at Operation Phase. Can the Applicant please provide further information on how it reach this conclusion,	The views from "Group of southern properties on New Drove" and "Group of southern properties on Cox Close and Ellerby Drive" are assessed in Appendix 9K at pages 9K28-9K32 and in more detail at Tables 9K.8 and 9K.9 (**ES Chapter 9 Landscape and Visual Appendices (Volume 6.4) [APP-079]**). The detailed assessment references nearby photomontage visualisations and estimates likely visibility from relevant upper floor windows using professional judgment. This approach accords with best practice guidance published by the Landscape Institute (Technical Guidance Note 2/19) that is referenced in Appendix 9K (**ES Chapter 9 Landscape and Visual Appendices (Volume 6.4) [APP-079]**) and states at paragraph 4.25 that the assessment will *"typically involve both desk study and detailed fieldwork but is unlikely to require visits to individual properties which, for the purposes of this step, can generally be assessed from the nearest publicly available vantage / access point."* The moderate level of effect predicted for residents at both receptor

ExQ1	Question to	Question	Applicant Response
		particularly in relation to potential views from higher floors?	groups would be Not Significant, due to the restricted or typically oblique nature of available views and an existing visual context in which extensive, visually similar development is present (retail, commercial and light industrial development within the Wisbech Retail Park and Wisbech Industrial Estate).
LV.1.5	Applicant	10 New Bridge Lane, as recognised by the Applicant, is particularly exposed to the Proposed Development in relation to visual impacts. This is then exacerbated, as also acknowledge by the Applicant, by the partial removal of trees and scrubs which would otherwise offer some degree of protection. Could the Applicant please confirm why the partial removal of trees and scrubs is necessary and why, at operation phase, the 3m high acoustic fence is deemed appropriate for screening views of HGVs?	The vegetation to be removed and retained is shown in **Figure 3.14** of **ES Chapter 3 Description of the Proposed Development Figures (Volume 6.3) [APP-049]** (a revised version of this Figure has been submitted at Deadline 2)**.** This shows that the existing trees and scrub outside of the Order Limits directly opposite 10 New Bridge Lane (which is the smaller, eastern most building outline on the plan with the western building outline being a large garage/outbuilding), would be retained. The tree and shrubs to be removed are those in oblique views from 10 New Bridge Lane and would be removed to accommodate the permanent access to the Site on New Bridge Lane, as well as soil storage bunds, grid connection compound and temporary workshop/store building, the locations of which are illustrated in **Figure 3.11i** and **3.11ii** of **ES Chapter 3 Description of the Proposed Development Figures (Volume 6.3) [APP-049]. Figure 3.14** of **ES Chapter 3 Description of the Proposed Development Figures (Volume 6.3) [APP-049]** also illustrates the location of native tree, hedgerow and wet woodland planting which is proposed within the area between the EfW Facility building and New Bridge Lane. The primary purpose of the 3m high acoustic fence is to provide noise attenuation as documented in **ES Chapter 7 Noise and Vibration (Volume 6.2) [APP-034]** and shown in **Figure 7.13** of **ES Chapter 7 Noise and Vibration Figures (Volume 6.3) [APP-051],** with partial screening representing a secondary benefit. The assessment for 10 New Bridge Lane in **Table 9K.1** in Appendix 9K (**ES Chapter 9 Landscape and Visual Appendices (Volume 6.4) [APP-079]**) recognises that the acoustic fence would not screen HGVs in their entirety and that HGVs would be partially visible above the 3m high fence.

ExQ1	Question to	Question	Applicant Response
LV.1.6	Applicant	How has the impact of the new proposed access for HGV vehicles via New Bridge Lane, both during Construction and Operation phases been taken into consideration as part of the overall Landscape and Visual Impact of the proposal in relation to Potty Plans Nursery, New Bridge Lane, 10 New Bridge Lane, Group of southern properties on New Drove, and Residents in Oakdale Place Park and New Bridge Lane Travellers Site Caravan Parks south of A47?	The assessment has considered the impact of HGV traffic upon these properties where relevant as outlined in Appendix 9K (**ES Chapter 9 Landscape and Visual Appendices (Volume 6.4) [APP-079]**) as follows: • At Table 9K.1 the increased level of movement from HGVs as a result of the construction and operation phase is described at 9 and 10 New Bridge Lane and also Rose Bungalow on New Bridge Lane. • The effects from Potty Plants of vehicle movements on the Site are recorded in the assessment (vehicles would not pass this property). • Views from the group of southern properties on New Drove has been assessed and concludes there would be no views of ground level construction or operational activities (vehicles would not pass these properties). The visual impact upon residents of Oakdale Place Park and New Bridge Lane Travellers Site Caravan Parks south of A47 are assessed at pages 9J25-J27 of **Appendix 9J** (**ES Chapter 9 Landscape and Visual Appendices (Volume 6.4) [APP-079]**). The caravan parks have dense screening to their northern boundaries and consequently views of during construction and operation of HGVs along New Bridge Lane would not be available.
LV.1.7	Applicant	Para 9.12.4 of Chapter 9 of the ES [APP-036] confirms the Applicant's intention to acquire 9 New Bridge Lane and cease its use as a residential property which would remove it as a visual Receptor with the consequence that no significant visual effects would occur. Could the Applicant please provide the ExA with an update on these negotiations and also what alternatives has it considered, particularly in relation to mitigation measures, in the event that it is unable to acquire 9 New Bridge Lane?	The Applicant's Additional Submission **[AS-001]** dated 24 August 2022, confirmed 9 New Bridge Lane had been acquired by the Applicant and the **Book of Reference (Volume 4.1) [REP1-001]** has been updated to reflect this.

Table 2.13 Major Accidents and Disasters

ExQ1	Question to	Question	Applicant Response
MA.1.1	Applicant	Para 17.3.6 of Chapter 17 of the ES [APP-044] states that a 1km buffer from the EfW CHP Facility Site is considered conservative for harm to Receptors. Could the Applicant please provide some further information of why that is the case, particularly in relation to stored waste materials?	The 1km Study Area has been selected as a conservative area for which to screen receptors which could be relevant to a potential major accident arising from the EfW CHP Facility, as any harm would be very localised. For a receptor to be relevant, there has to be a credible risk of suffering serious damage which was defined in Appendix D of the Scoping Report as a substantial number of members of the public requiring medial attentions, or multiple life changing injuries or loss of life to workers. It should be noted that a full assessment of Major Accidents and Disasters has not been undertaken as the Planning Inspectorate agreed in their **Scoping Opinion (Appendix 1D of the ES (Volume 6.4) [APP-068])** that the effects were unlikely to be significant and were therefore not required to be considered as part of the EIA. The nature of the harm from the types of potential major accidents inherent in the Proposed Development is relatively localised. For example, As described in **Table 17.5 of ES Chapter 17 Major Accidents and Disasters (Volume 6.2) [APP-044]**, a major fire is likely to have the most widespread consequences but even these are anticipated to be limited to much less than 1km. The design of the facility ensures that fire prevention, detection and suppression systems are built into the facility and the structure of the building will ensure that any fire and the waste materials will be retained within the building envelope, which will be secured under the Fire Prevention Plan, Requirement 17 of the **Draft DCO (Volume 3.1) [REP1-007].** In relation to the stored waste materials, the waste will be primarily domestic waste streams and will not be classified as hazardous under any category, i.e., it will not be flammable, explosive or toxic. The waste materials or dry fractions of it may be combustible solids, where there is a potential fire risk. However, the structural design of the facility will retain the waste materials, the fire and any firewater deployed in the event of a fire, which will be secured under the Fire Prevention Plan, Requirement 17 of the **Draft DCO (Volume 3.1) [REP1-007].** The nature of the material ensures that it cannot migrate offsite and lead to a major fire or explosion outside of the facility, which is a recognised hazard in other industries such as natural gas. Any offsite harm is anticipated to be limited the effects of smoke, and the potential effects of smoke will diminish

ExQ1	Question to	Question	Applicant Response
			significantly with increasing distance from the site, and the impacts of smoke are described in Table 17.5 of **ES Chapter 17 Major Accidents and Disasters (Volume 6.2) [APP-044]**.
MA.1.2	Applicant	Para 17.3.13 of Chapter 17 of the ES [APP-044] states that it is unlikely that two unrelated major accidents and disasters could occur in the same time period. Although the ExA accepts this, accidents and disasters are by nature unpredictable events and therefore one major accident could lead to others. Can the Applicant please confirm if any assessment has bene carried out of the cumulative or combined effects of major accidents and disasters?	Where a major accident could directly lead to additional consequences, this would be considered as an escalation of the first accident, rather than an unrelated accident occurring at the same time. The potential for escalation events has been inherently considered in the assessment through two approaches. Firstly, where a major accident could occur offsite, this would be assessed under 'External accidents'. As there is limited potential for major accidents in the vicinity, and the Proposed Development is not located within the consultation zone of any hazardous site, no escalation events of this type were identified. Secondly, where a major accident could occur on site, these were assessed as part of the consequence for the initiating event. For example, the accidents involving high voltage electricity includes the potential to cause a subsequent fire or explosion. The embedded measures will ensure that the potential for these escalation events are considered through a robust risk-assessed design process. For example, Embedded Measure ID 3 requires consideration of separation and segregation to prevent escalation of fires, which is to be secured through the Environmental Permit. The assessment of these potential major accidents are described in **ES Chapter 17 Major Accidents and Disasters** (**Volume 6.2) [APP-044]**. However, as accepted by the ExA, it is extremely unlikely that unrelated but simultaneous major accidents could occur, so no assessment has been undertaken and the assessment of MADs was scoped out with the agreement of the Secretary of State. While this is theoretically credible, the likelihood of such a coincident occurrence is small and therefore not reasonably foreseeable. Additionally, it should be noted that our approach is aligned to

ExQ1	Question to	Question	Applicant Response
			HSE's Decision Making Methodology, as described in Paragraph 17.3.16 of **ES Chapter 17 Major Accidents and Disasters (Volume 6.2) [APP-044]**.

Table 2.14 Noise and Vibration

ExQ1	Question to	Question	Applicant Response
NV.1.1	Applicant Cambs CC Fenland DC BCKLWN Norfolk CC	Chapter 7 of the ES Noise and Vibration [APP-034] states, in para. 7.5.2 that the influence of COVID-19 on the measurement data was considered by comparison with monitoring data acquired in 2019 (prior to the pandemic) and with noise mapping data which indicates expected levels of road noise during daytime and night-time. The comparisons indicated that differences in sound levels were generally within ±3 dB, indicating that the 2021 monitoring data were not unduly affected by variations in local conditions due to the pandemic, and are therefore representative of current baseline conditions. Do the Host Authorities agree with this approach and the conclusions reached by the Applicant?	Although the question is directed at the Host Authorities, the topic of suitability of data with respect to Covid conditions was specifically raised with the Host Authorities and reported in Table 7.3 of **ES Chapter 7 Noise and Vibration (Volume 6.2) [APP-034]**. FDC Senior EHO confirmed by email that baseline surveys may go ahead after 12 April 2021, assuming local activity had returned to normal following the lifting of lockdown restrictions in place to control the spread of coronavirus. FDC requested that data is provided (traffic and footfall data) demonstrating that local activity has returned to typical levels. They provided suggested amendments to the SMP, which have been addressed with further consultation. No response was received from CCC. However, comments from FDC were understood to represent CCC's view, as FDC were the leading local authority stakeholder for noise and vibration. The Principal EHO for KLWN (on behalf of KLWN and NCC) responded by email confirming they were satisfied that the proposal to carry out baseline surveys after 12 April 2021 was reasonable, assuming retail and other businesses were open following lifting of restrictions in place to control the spread of coronavirus. Further clarification via a consultation email dated 7 January 2022, the response from FDC's consultant EHO raised on behalf of all Host Authorities was that the data should be suitable if the survey was conducted in accordance with the Institute of Acoustics/Association of Noise Consultants *'Joint Guidance on the Impact of COVID-19 on the Practicality and Reliability of Baseline Sound Level Surveying and the Provision of Sound and Noise Impact assessments'* The assessment was conducted as set out in Section 4.1 of ES Appendix 7A 'Baseline Monitoring Report' (**Volume 6.4) [APP-076].**
NV.1.3	Applicant	Can the Applicant clarify its assessment in terms of the effect of the proposed development on sensitive receptors, in relation to noise and vibration and clarify why it does not believe that the effects of the proposal will be significant, particularly considering the relative proximity of the	The assessment of noise and vibration has been carried out in accordance with nationally recognised standard assessment methodology set out in Table 7.9 of the ES (**ES Chapter 7 Noise and Vibration (Volume 6.2) [APP-034]**). Significant adverse effects have been determined using the standard methodologies and the IOA/IEMA 'Guidelines for environmental noise impact assessment, Version 1.2' this approach was agreed with the Host Authorities

ExQ1	Question to	Question	Applicant Response
		Proposed Development to other businesses as well as residential ues (sic).	at scoping stage and reported in paras 7.3.7 to 7.3.11 of **ES Chapter 7 Noise and Vibration (Volume 6.2) [APP-034].** Embedded mitigation measures for noise are reported in Section 7.7 of **ES Chapter 7 Noise and Vibration (Volume 6.2) [APP-034]**. In addition to embedded mitigation, where significant adverse effects have been identified, additional mitigation has been included to reduce such effects. Significant effects were established and mitigation, in the form of an acoustic fence was deemed sufficient to reduce effects to non-significant at 10 New Bridge Lane (residential receptor). The acoustic fence is permitted through the **Draft DCO (Volume 3.1) [REP1-007]** as Work no.10 and secured by Requirement 19(3). Significant effects were established and mitigation was deemed insufficient to reduce effects to non-significant at 9 New Bridge Lane (residential receptor). The Applicant has subsequently purchased this property (**Book of Reference (Volume 4.1) [REP1-001])** and it will be brought out of residential occupation if the Proposed Development goes ahead, as secured under Requirement 19(1) and (2) of the **Draft DCO** (**Volume 3.1) [REP1-007]**. Other residential receptors will benefit from embedded mitigation and application of the Construction Noise and Vibration Management Plan (CNVMP) within Appendix F of the **Construction Environmental Management Pla**n **(Document 7.12) Appendix F [REP1-024]** through the construction phase which is secured under Requirement 10 of the **Draft DCO** (**Volume 3.1) [REP1-007]**. With these measures in place, effects will not be significant. During the operational phase, Best Available Techniques (BAT) and the application of the final Operational Noise Management Plan (ONMP) based on the **Outline ONMP (ES Chapter 7 Noise and Vibration Appendix 7D, Volume 6.2 [REP1-013]** secured by Requirement 19(4) and (5) of the **Draft DCO** (**Volume 3.1) [REP1-007]** support the conclusion that operational noise and vibration effects will not be significant.

ExQ1	Question to	Question	Applicant Response
			In terms of commercial receptors, it should be recognised that there are no definitive guidelines for assessment. As described in Section 7.8.35 of British Standard 5228 part 1:2009 +A1:2014 states in Annex E.2. *"Noise from construction and demolition sites should not exceed the level at which conversation in the nearest building would be difficult with the windows shut... Noise levels, between say 07.00 and 19.00 hours, outside the nearest window of the occupied room closest to the site boundary should not exceed:* *• 70 decibels (dBA) in rural, suburban and urban areas away from main road traffic and industrial noise;* *• 75 decibels (dBA) in urban areas near main roads in heavy industrial areas. These limits are for daytime working outside... ...offices."* A project specific criterion of 65 dB for construction noise at non-residential receptors was selected such that the 70 dB BS5228-1 criterion is unlikely to be exceeded and the 75 dB 5228-1 criterion cannot be from site emissions. This is considered a conservative approach and protects all employees at nearby businesses. This was agreed with FDC's Consultant EHO (Table 7.2, **ES Chapter 7 Noise and Vibration (Volume 6.2) [APP-034]).** Table 7.38 of the **ES Chapter 7 Noise and Vibration (Volume 6.2) [APP-034]** provides the predictions of operational noise at non-residential receptors. This shows that the highest predicted level is 65dB. BS4142:2014 +A1:2019 is suitable for assessing residential and educational receptor exposure, but not commercial receptors. Therefore, the BS 8233 commercial noise environment criteria used for construction noise assessment of commercial receptors is also considered appropriate for operational noise. Therefore, the maximum operational noise of 65dB at nearby commercial receptors would confirm that significant effects are not predicted at nearby businesses.

Table 2.15 Planning Policy

ExQ1	Question to	Question	Applicant Response
PP.1.1	Applicant	Can the Applicant confirm how other energy projects have been taken into consideration in relation to need and which projects have been considered?	For both the local and national analysis of fuel availability, the updated **WFAA (Volume 7.3)** submitted at Deadline 2 has sought to consider other energy projects in terms of EfW capacity and the extent to which there is a need for additional residual waste management capacity by reviewing the capacity of these EfW projects both in the Study Area and in England: • All operational capacity; • All capacity under construction; • All consented capacity (but not built); and • Capacity in the planning system. The purpose of this review was to validate the findings of a key study that the WFAA relies on, namely: Landfill and Residual Treatment Capacity in the Wider South-East of England, Report for the East of England Waste Technical Advisory Body; the Southeast Waste Planning Advisory Group; and the London Waste Planning Forum, Sacks Consulting (May 2021). The details of which other EfW facilities within the Study Area which have been included within the Applicant's **WFAA (Volume 7.3)** are listed within Appendix C to that document, updated and submitted at Deadline 2. The estimated capacity of these facilities in the Study Area is identified as follows: • Consented and operational – 925,000 tonnes per annum. • Consented and under construction – 595,000 tonnes per annum. • Consented and not built – 595,000 tonnes per annum. • In planning – 150,000 tonnes per annum. Consented EfW capacity which is either operational or under construction (as set out in Appendix C of the WFFA), equates to ~1,520,000 tonnes per annum. This is ~705,000 tonnes per annum below the findings of the May 2021 study (which assumed a residual waste treatment capacity of 2,225,000 tonnes). An adjustment has been made in this potential 'over-reporting' of residual waste treatment capacity in the May 2021 Sacks report. As such, instead of

ExQ1	Question to	Question	Applicant Response
			highlighting a 0.7-2.0 million tonne gap in residual waste management capacity (in line with the conclusions of the Sacks report), the updated **WFAA (Volume 7.3)** submitted at Deadline 2 has amended this to a gap of almost 1.3 million to over 2.6 million tonnes per annum. **ES Chapter 18 Cumulative Effects Appendix 18A Long-list and Short-list of Other Developments (Volume 6.4) [APP-090]** lists the other projects considered by the Applicant including other energy projects within its environmental assessment. The Applicant's cumulative assessment methodology is consistent with PINs Advice Note 17 and requires the development of a project long-list and short-list. The Applicant can confirm that the long-list includes energy projects such as solar and battery storage. Because these energy projects sat outside of relevant Zones of Influence they were scoped from the consideration of cumulative effects.
PP.1.2	Applicant Cambs CC Fenland DC BCKLWN Norfolk CC	As stated in para 3.3.2 of the [APP-095] Project Benefits Report, "NPS EN-3, in its consideration of waste combustion generating stations states, at paragraph 2.5.64 that stations 'need not disadvantage reuse or recycling initiatives where the proposed development accords with the waste hierarchy' ". How does the Applicant feel that the present Development Proposal meets the Waste hierarchy? The HLAs are asked to also comment on this point.	MVV fully supports the reduction of waste, re use of waste and recycling of waste and it must be stressed that the facility will not prevent recycling. In terms of the waste hierarchy, it is considered that the Proposed Development will fully deliver implementation of the waste hierarchy – a cornerstone of England's waste management policy and legislative framework - and divert waste from continued management at the bottom of the waste hierarchy (i.e., landfill) up to having value (in the form of electricity recovered from it). The Proposed Development is designed to accept residual waste, from codes 19 and 20. These are wastes that remain after source separation of recyclables or processing to recover any such viable recyclable material. At other MVV EfW facilities the use of waste codes 19 and 20 prevents the delivery of source segregated or pre-sorted recyclates. The target feedstock is residual waste that is currently being landfilled. As such the facility will move the waste up the waste hierarchy from disposal to recovery. The Applicant's **WFAA (Volume 7.3)** updated for Deadline 2 explains how waste would be managed in accordance with the waste hierarchy and lists

ExQ1	Question to	Question	Applicant Response
			those waste streams which it will accommodate and which are currently managed lower down the hierarchy at Section 3.2. The Applicant has included within the **Draft DCO (Volume 3.1) [REP1-007]** Requirement 14 which requires the undertaker to submit to the relevant planning authority for approval a scheme which sets out the arrangements for the maintenance of the waste hierarchy and minimisation of recyclable and reusable waste received at the EfW CHP Facility.
PP.1.5	Applicant	Technology in relation to EfW is fast evolving. Can the Applicant please confirm how it has considered the best available technology in relation to the production of EfW and how has this technology informed the development of Alternatives?	The Applicant's parent companies have many years of experience in EfW technology and keep abreast of latest developments. This includes developments in Germany and the UK, and alternatives to combustion such as gasification and pyrolysis. Experience by others has shown that these alternatives in particular are difficult to make work at the scale of, and with mixed residual wastes of the type envisaged by, the Proposed Development. Other systems not involving thermal treatment have also been examined; most recently the Applicant's parent company examined a system using enzymes to treat the waste, but on assessment following a site visit it was determined that this system also has not worked on a commercial basis. In reality, most technologies evolve slowly and take many years of small scale and then larger scale plants to demonstrate effectiveness, reliability and commercial competitiveness. Where full scale plants using new technologies have been built there are several examples of them being subsequently closed down. The MVV has many years of experience in EfW technology and keep abreast of latest developments. This includes developments in Germany and the UK, and alternatives to combustion such as gasification and pyrolysis. Experience by others has shown that these alternatives in particular are difficult to make work at the scale of, and with mixed residual wastes of the type envisaged by, the Proposed Development. Other systems not involving thermal treatment have also been examined; most recently the Applicant's parent company examined a system using enzymes to treat the waste, but on assessment following a site visit it was determined that this system also has not worked on a commercial basis. In reality, most technologies evolve slowly and take many years of small scale and then larger scale plants to demonstrate effectiveness, reliability and commercial competitiveness. Where full scale plants using new

ExQ1	Question to	Question	Applicant Response

technologies have been built there are several examples of them being subsequently closed down or failing to work at a commercial level. See **Table PP.1.5**, below.

Table PP.1.5: Examples of failed or commercially substandard residual waste management facilities (2023)

Site*	Technology	Status
Sinfin, Derby	Gasification	Mothballed
TOVI Eco Park, Essex	MBT	Decommissioned and demolished
Swindon	SRF conversion	Decommissioned and demolished
Hoddesdon ATT	Gasification	Mothballed
Air Products, Billingham, Teesside	Gasification	Mothballed (possibly demolished)
Avonmouth ATT	Gasification	Mothballed
Renescience, Northwich	Treatment with enzymes, anaerobic digestion and mechanical treatment	For sale
Greater Manchester MBTs, four locations	MBT	Partly Mothballed or decommissioned
Merseyside, Huyton	MBT	Mothballed
Rotherham	MBT with autoclave	Mothballed
Derwenthaugh, EcoParc, Gateshead	MBT with autoclave	Mothballed
Waterbeach, Cambridgeshire	MBT	Working inefficiently
Thornton, Lancashire	MBT	Mothballed
Leyland, Lancashire	MBT	Mothballed

ExQ1	Question to	Question	Applicant Response
			*Does not include energy from waste facilities that were initially consented to be gasification or pyrolysis that were subsequently approved to be changed to conventional combustion energy from waste. MBT = mechanical and biological treatment SRF = solid recovered fuel ATT = advanced thermal treatment Should it assist the ExA, the Applicant can provide further information on the failed/commercially substandard facilities.
PP.1.5 (sic)	Applicant	Can the Applicant please confirm how it has considered the National Infrastructure Commission Design Principles for National Infrastructure and what consideration has the Applicant given to the National Model Design Code.	The **Design and Access Statement (Volume 7.5) [APP-096]** (DAS) explains the consideration given to the National Infrastructure Commission Design Principles for National Infrastructure. Page 7 records that four design principles are identified which are: • Mitigate greenhouse gas emissions and adapt to climate change • Reflect what society wants and share benefits widely • Provide a sense of identify and improve our environment and • Achieve multiple problems and solve problems well. The National Infrastructure Commissions expands upon each principle with supporting text. This text, together with guidance provided within NPS EN-1, EN-3 and EN-5, draft NPSs, the NPPF and National Design Guide and local plan policy and guidance was developed into four wider design principles which are also referenced within the DAS at page 7 and this document also signposts where these principles are addressed within the Statement. The DAS conclusion returns to the Commission's principles and summarises how the design of the Proposed Development is consistent with them (Page 53). In summary the Proposed Development mitigates greenhouse gas emissions by reducing the amount of waste landfilled, by proposing an EfW CHP Facility that would be BREEAM Good and an Administration Building that would be BREEAM Excellent. It is also adaptable to future climate change having been designed to accommodate future flooding events and to respond to higher temperatures and fluctuations in rainfall via sustainable urban drainage systems, rainwater harvesting and the provision of natural cooling

ExQ1	Question to	Question	Applicant Response
			and ventilation within the administration building. The Proposed Development would share benefits by providing lower cost heat and power to adjoining businesses, by reopening New Bridge Lane consistent with the Council's proposed Wisbech Access Strategy but not compromising future reopening of the disused March to Wisbech Railway. It would provide wider, biodiversity benefit through a commitment to net gain with a landscaping scheme design with ecological enhancement as a key principle. Taking into account comments on the design that have been raised at both non statutory and statutory consultation, greater architectural consideration has been given to alternatives with regard to the finishing materials and appearance of the main boiler house, through the commitment to BREEAM Good and Excellent referred to above and the provision of opportunities to create a sense of identity. Separate to the proposed EfW CHP Facility, significant consideration has been given to the consideration of alternatives in the design of the Grid Connection with regard both to the point and type of connection. Information on this element of the Proposed development is to be found within ES **Chapter 2 Alternatives Appendix 2A Grid Connection Options Report (Volume 6.4) [APP-096].** The ExA also refers to the National Model Design Code. The Model Code describes itself as '*detailed guidance on the production of design codes, guides and policies to promote successful design*' and records that it is aimed primarily at local planning authorities and the preparation of their design guides or codes rather than as a document for assessing planning application. However, Part 2 Guidance Notes sets out the possible contents for a design code to be produced by a local planning authority and it identifies eleven topics. These have been set out below together with signposts as to where these are considered within the DAS: • Context: the DAS considers context at Pages 12-13. • Movement: the DAS considers movement at Page 15 and 36. • Nature: the DAS considers nature at Page 33. • Built form: the DAS considers at Page 22. • Identify: the DAS considers at Pages 27-29.

ExQ1	Question to	Question	Applicant Response
			• Public space: As an operational EfW CHP facility, no public space is proposed. • Use: the DAS establishes the use at Pages 9-11 • Homes and buildings: not applicable • Resources: the DAS considers sustainability at Pages 30-31. • Lifespan: the BREEAM commitments referenced above aim to reduce the impact on the environment throughout the whole of the building's lifespan (DAS page 35) • Community engagement: the DAS summarises the statutory engagement at Pages 25-26.

Table 2.16 Socio-Economic, Population and Cumulative Effects

ExQ1	Question to	Question	Applicant Response
SPC.1.1	Applicant	ES Chapter 15: Socio-economics and Tourism [APP-042] does not explain if any Public Rights of Way will required to be temporary or permanently diverted as a result of the Proposed Development. Can the applicant confirm whether any Public Rights of Way will be affected by the Proposed Development and whether any diversions or temporary closures will be necessary?	The Applicant can confirm that no Public Rights of Way will be directly affected by the Proposed Development. **The Access and Rights of Way Plan Rev 3 (Volume 2.4) [REP1-005]** identifies the Public Rights of Way in proximity to the Proposed Development and demonstrates that rights of way, 266/21 to 72/6, Emneth FP9 and Walsoken FP8 were terminated by the construction of the A47. As such they would not be directly affected by the construction of the Grid Connection.
SPC.1.3	Applicant	Para 18.8.1 of Chapter 18 of the ES states that, in relation to inter-project effects that the assessment of cumulative effects has been completed based on information relating to the committed developments which are available within the public domain. Can the Applicant confirm if any projects currently under consideration but yet undecided, particularly linked to energy, have been considered as part of cumulative effects?	The Applicant's methodology for the consideration of inter-project related effects is consistent with PINs Advice Note 17 Cumulative Effects. As such, three types of project were considered: • Tier 1 – NSIPs or TCPA application either under construction, permitted or yet to be determined; • Tier 2 - Projects on the Planning Inspectorate's Programme of Projects, and/or the relevant local planning authorities planning portal where a scoping report has been submitted but an application is still to be submitted; • Tier 3 - Projects on the Planning Inspectorate's Programme of Projects but where a scoping report is yet to be submitted, local plan allocations and any relevant future development frameworks. The relevant projects were initially identified within a long-list. This was populated based upon the establishment of a Zone of Influence (ZOI) for each environmental topic. Project identified in the long-list can be found within **ES Chapter 18 Cumulative Effects Appendix 18A Long-list and Short-list of Other Developments (Volume 6.4) [APP-090].** The Applicant can confirm that this long-list includes projects which were under consideration but undecided as of 14 February 2022 and that these projects include energy projects such as solar and battery storage.

ExQ1	Question to	Question	Applicant Response
			As the Applicant's approach was to include applications at scoping and local plan allocations, any projects which may have been submitted subsequent to February 2022 would have been captured within the long and potentially short-list.
SPC.1.4	Applicant	Can the Applicant please confirm that the short list of developments for the cumulative assessment has been agreed with relevant consultees.	The long-list and short-list was issued to the host authorities on 14 February 2022. Cambridgeshire County Council responded via email to request that an additional project, the proposed SMEH school be included. The Borough Council of Kings Lynn and West Norfolk also requested the addition of one project and confirmed within its relevant representation (**RR-001**, Section 3.16) that it had no further comments to make other than with regard to individual (ES) topic chapters. Both additional projects were included for consideration by the Applicant. No responses were received from Fenland District Council and Norfolk County Council although Norfolk County Council has confirmed within its relevant representation (**RR-004**) that it does not have any further issues to raise in respect of the cumulative impact of the development within Norfolk i.e., the cabling and connection to the Grid Connection at Walsoken.
SPC.1.5	Applicant	The Applicant has identified in Para. 18.7.6 of the ES Chapter 18 [APP-045] that several receptors (Potty Plants, The Chalet New Drove, Peckover House, Wisbech Town Centre Conservation Area and River Nene CWS) are identified as having two or more 'Not Significant' effects which cumulatively have the potential to be significant. In the following Para. It states that: "In respect of these Receptors, the various combinations of Noise, Air & LVIA; LVIA & Historic Environment; Air and Hydrology and Socio economic, Tourism, Recreation and Land use are judged to be Not Significant effects". Could the Applicant please provide further detail on how it has reached this position	The Applicant recognises that the conclusions of 'not significant' effects identified within para. 18.7.6 of **ES Chapter 18 Cumulative Effects (Volume 6.2) [APP-045]** have been arrived at with embedded mitigation measures in place. The reference to 'cumulatively have the potential to be significant' refers to the fact that where a Receptor experiences more than one 'not significant' effect that there is always a potential for a single, cumulative, significant effect to occur. This is not however automatic, and the cumulative level of significance is instead a professional judgement informed by the comprehensiveness of the embedded mitigation measures to keep the individual 'not significant' effects as low as is practicably possible. In the case of the Receptors identified the Applicant did conclude that the measures embedded to address individual 'not significant' effects would also prevent significant cumulative effects from occurring. In the case of those Receptors experiencing a combination of 'not significant' historic environment and landscape and visual effects, para 18.7.7 records

ExQ1	Question to	Question	Applicant Response
		particularly considering that the significance of identified effects already took into consideration mitigation measures associated with the construction and operation stages as identified in the outline CEMP?	that the individual effects would not combine to give rise to a significant cumulative effect. The reason for this is the distance and orientation of the Receptors to the Proposed Development.
SPC.1.6	Applicant	Can the Applicant also provide further confirmation in relation to the employment numbers, during construction and operation phase that expects to be generated? Can the Applicant also confirm if it has had any conversations or negotiations already with local training facilities in relation to facilitating training and employment opportunities?	The Applicant can confirm that around 700 Full Time Equivalent (FTEs) would be employed during the 36 month construction process. This number is set out within **ES Chapter 3 Description of the Proposed Development (Volume 6.2) [APP-030]** at Section 3.8.57. The Applicant cannot provide a precise number because this will be dependent upon the EPC contractor appointed and the extent to which it will sub-contract various aspects of the construction. The estimate of 700 is informed by the Applicant's experience of constructing similar facilities elsewhere in the United Kingdom. The Applicant can confirm that 40 FTEs would be employed at the EfW CHP Facility during operation. This number is an increase on the 32 FTE employed at MVV's existing UK facilities but reflective of the fact that the Proposed Development would operate two lines and as such require an additional number of permanently employed maintenance and operational staff. At this time, the Applicant's discussions have included the Thomas Clarkson Academy, regarding educational opportunities, including work experience. Meetings were also offered to the Host Local Authorities' economic development teams, although only Norfolk County Council responded. The Applicant would therefore welcome further engagement with the Host Local Authorities to better target local training and education needs; this would allow local people to access higher paid jobs. The Applicant has also identified the following education and training establishments: • College of West Anglia, Wisbech Campus • Anglia Ruskin University, Cambridge Campus

ExQ1	Question to	Question	Applicant Response
			Emails have been sent to these educational establishments, offering to engage with them on curriculum support, guest lectures, apprenticeships and internships. More detail is provided in the **Outline Employment and Skills Strategy (Volume 7.8) [APP-099].**
SPC1.7	Applicant	Several education facilities are located within relative close proximity of the proposed development. Can the Applicant please explain how it has considered the cumulative effects of the Proposed Development, particularly in the context of impacts on young people?	Relevant, individual, environmental assessments reported within the Environmental Statement consider the potential for effects upon local schools as Receptors. They are considered within **ES Chapter 6 Traffic and Transport, Chapter 7 Noise and Vibration, Chapter 8 Air Quality and Chapter 15 Socio economics, Tourism, recreation and Land Use (all Volume 6.2, APP-033, APP-034, APP-035 and APP-042 respectively). ES Chapter 9 Landscape and Visual (Volume 6.2) [APP-036]** also considers the visual effects upon the Thomas Clarkson Academy. This assessment was undertaken at the request of Cambridgeshire County Council notwithstanding the agreement of the Planning Inspectorate to scope out the Thomas Clarkson Academy which is explained in **Appendix 9A– Consultation Response Summaries (Volume 6.4) [APP-079].** The ES does not commonly consider young people or indeed any age cohort as a distinct Receptor group. The one assessment which does differentiate young people from other human receptors is the **Human Health Risk Assessment, ES Chapter 8 Air Quality Appendix 8B Annex G HHRA (Volume 6.4)** Revision 3 submitted at Deadline 2. This states at para 3.1.5 that children are important because they tend to ingest soil and dust directly and have lower body weights such that the effect of the same dose in greater in the child than the adult. The assessment assesses the potential effects upon children, adults and children and adults (farmers) across each of the emissions modelled and concludes that exposure would not be significant. In view of the above, the assessment of cumulative effects has not considered young people as a specific Receptor group. It has focused instead upon those Receptors where potential significant effects have been predicted in respect of at least two or more environmental topics.

ExQ1	Question to	Question	Applicant Response
			The Applicant believes that the Proposed Development and associated community benefits will have a positive effect on local young people by raising aspirations in relation to STEM careers and offering opportunities for work experience, apprenticeships and internships. This is based on the Applicants previous experience at its three operational sites in the UK, as well as the UK-wide company. A total of nine apprentices are currently employed in the UK businesses. More detail is provided in the **Outline Employment and Skills Strategy (Volume 7.8) [APP-099].**

Table 2.17 Traffic and Transport

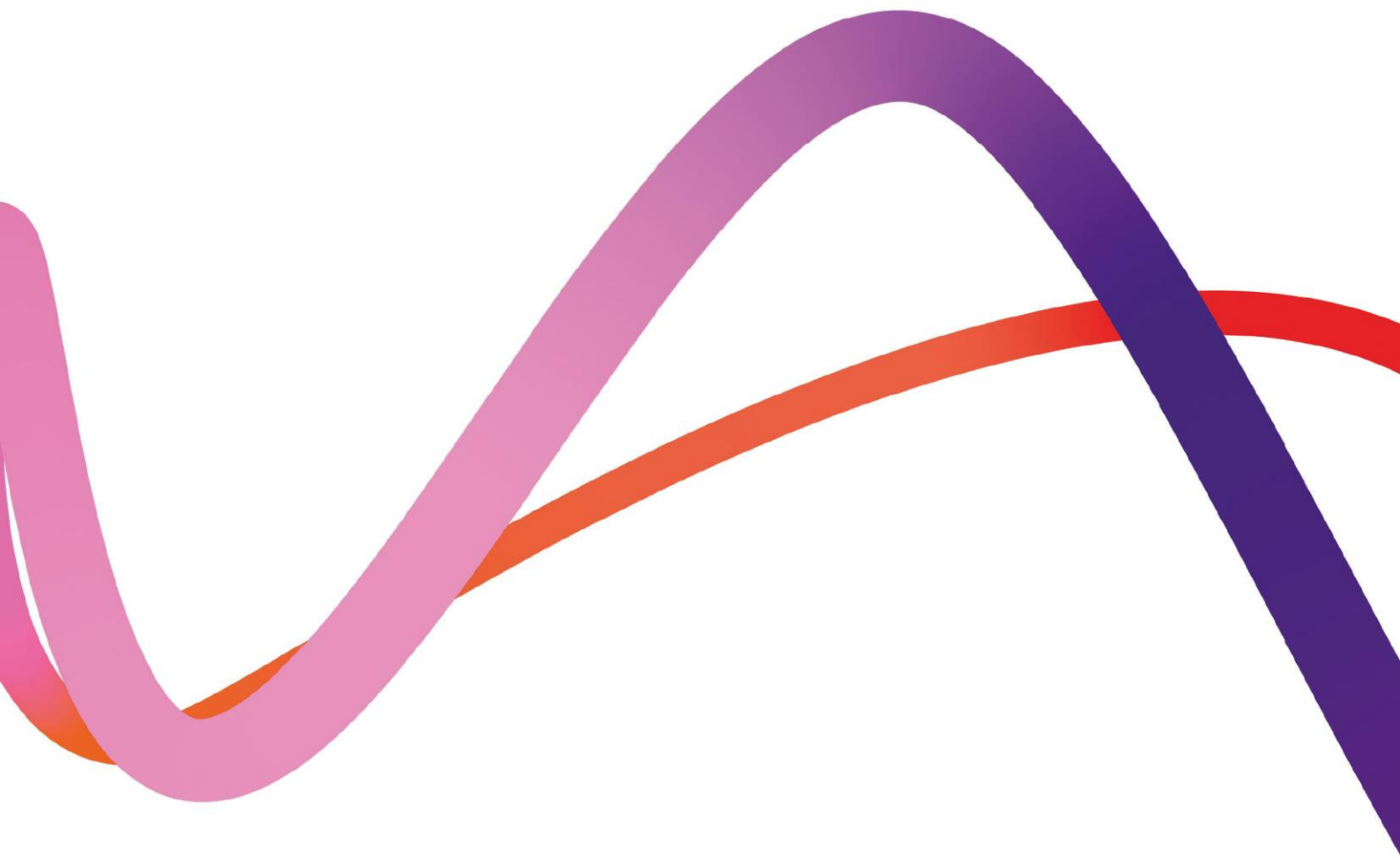
ExQ1	Question to	Question	Applicant Response
TT.1.1	Applicant Cambs CC Norfolk CC National Highways	Chapter 6 of the ES [APP-033] states, in para. 6.5.31 that the baseline traffic surveys were undertaken over a two-weeks between 8 October 2021 to 21 October 2021. In para. 6.5.28 of the same document the Applicant recognises that, due to the ongoing COVID-19 pandemic, the baseline traffic flows could have been skewed and therefore it was agreed with the relevant highways authorities (National Highways, Cambs CC and Norfolk CC) that the baseline traffic flows could be derived from existing historic traffic counts. Can the Applicant please confirm how this work informed the Proposed Development and also how the baseline traffic flows derived from existing historic traffic counts differed from the baseline traffic surveys undertaken between 8 October 2021 to 21 October 2021?	As per Section 6.5.28 and 6.5.29 **ES Chapter 6 Traffic and Transport (Volume 6.2) [APP-033]** identifies that at PEIR stage historic counts were used to inform assessment (with the agreement of National Highways, Cambridgeshire CC and Norfolk CC) within Sections 6.10 and 6.11. During the period of the PEIR submission undertaking traffic surveys to inform assessment would not have been appropriate due to COVID 19 pandemic restrictions and the resultant impact on traffic flows. Historic data included a mix of DfT counts and surveys from recent planning applications submitted within the scope of assessment. These are the historic traffic counts referred to. Sections 6.5.28 and 6.5.29 also identify that as per agreement receptor locations identified for assessment in Sections 6.10 and 6.11 would be resurveyed to provide an updated dataset for DCO submission. These surveys were undertaken between 8 October 2021 and 21 October 2021. As such assessment within **ES Chapter 6 Traffic and Transport (Volume 6.2) [APP-033]** uses surveyed data which reflects the conditions of the local highway network within the scope of the assessment and does not use historic data. Any differences between the historic data and surveyed data are not material, therefore, the Applicant's approach is robust. This conclusion is supported by CCC in its relevant representation [**RR-002]** which confirmed the following at paragraph 3.32: *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 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.*

ExQ1	Question to	Question	Applicant Response
TT.1.2	Applicant	Chapter 6 of the ES [APP-033] states, in para. 6.5.29 states that it was also agreed that all the Receptor locations included at the Preliminary Environmental Information Report (PEIR) would be resurveyed for the DCO submission. Can the Applicant please confirm that this work was carried out and how the results of the resurveyed sites differ from the previous survey (if applicable)?	As per Section 6.5.29 **ES Chapter 6 Traffic and Transport (Volume 6.2) [APP-033]** of the ES all links which were assessed within the PIER submission have been resurveyed for DCO submission. In addition, and in response to comments received at statutory consultation two additional Receptors were included, the A47 (between Lynn Road and A17) and A1011 south of the A47. Traffic count surveys undertaken between 8 October 2021 and 21 October 2021 provide the resurveyed data which has been used to inform the assessment. The traffic count surveys identified that the percentage of HGV using the routes to taken by construction and operational traffic was broadly comparable with the data presented in the PEIR although the total number of vehicles did differ being sometimes higher and sometimes lower. For example, New Bridge Lane figures for PEIR estimated 1691 vehicles, 20.6% being HGV whilst traffic counts identified 791 vehicles with 21.9% being HGV. In contrast Weasenham Lane estimated for PEIR were 8647 with 5.4% HGV with traffic counts registering 12026 of which 5.3% would be HGV. The relevant tables are PEIR Chapter 6 Traffic and Transport Table 6.6 and **ES Chapter 6 Traffic and Transport (Volume 6.2) [APP-033]** Table 6.6.
TT.1.4	Applicant	ES Chapter 6: Traffic and Transport [APP-033] para 6.6.83 states that there may be occasions where deliveries may be required outside of the usual delivery times of between 07:00 and 20:00. Therefore, it is proposed that the Proposed Development be able to accept waste outside the operating hours stated above in these circumstances. Can the Applicant clarify how deliveries of waste outside of standard permitted hours will be managed and how this is reflected within the DCO? Can the Applicant confirm that the flexibility for out of standard permitted hours has been taken into account for the ES assessments?	The **Outline Operational Traffic Management Plan (Volume 7.15) [REP1-026]** establishes the procedure to be adopted should deliveries outside of specified delivery times occur. It states at 2.1.3 that in the event of a waste delivery being received outside of the normal operating hours, the circumstances will be logged by the control room operators and the vehicle parked up onsite. The vehicle will not be weighed and unloaded until normal operational hours for the acceptance of waste resume. The **Draft DCO (Volume 3.1) [REP1-007]** Requirement 12 requires an **Operational Traffic Management Plan** substantially in accordance with the **Outline Operational Traffic Management Plan (Volume 7.15) [REP1-026**] to be submitted to the relevant planning authority prior to the date of final commissioning for its approval. The Applicant can confirm that the Environmental Statement does not include for occasions where deliveries may be required outside of specified hours. This is because these deliveries would be by definition exceptional, and it is not

ExQ1	Question to	Question	Applicant Response
			possible to anticipate the number, frequency or duration of such deliveries in these situations. The environmental effects upon traffic and transport Receptors as a result of exceptional circumstances would not affect the overall conclusion of effects which are set out within **ES Chapter 6 Traffic and Transport (Volume 6.2) [APP-033].**
TT.1.5	Applicant	The grid connection is proposed to be installed by open cut trench method, at a depth of 1.6m. This is likely to be at a depth of 2m at the Broadend Road and A47 junction, this is in order to allow Cambridgeshire County Council to construct a proposed roundabout in the future or to account for unforeseen circumstances. Can the Applicant confirm if any road closures will be required due to grid connection works, and if so, how these will be managed?	Section 7.3 of ES Chapter 6 Traffic and Transport **Appendix 6A Outline Construction Traffic Management Plan (Volume 6.4) [REP1-002]** identifies sections of the highway that will need to be managed when sections of underground cable are installed beneath the carriageway. Section 7.3.4 identifies that site specific traffic management cannot be defined at this stage as this will be within the remit of the construction contractor in discussion with the relevant highway authority. For example, it may be possible to temporarily close half of the carriageway at any one time introducing traffic management measures in the form of a signalised contraflow system to allow for traffic to continue to gain access along the carriageways. It has also been agreed with National Highways that works within the verge of the A47 will be undertaken a night when traffic flows are likely to be lower.
TT.1.8	Applicant Cambs CC	Cambs CC and Fenland DC RR states in para. 3.7 that "any approvals greater than 2 years old would need to be checked against the current streetlighting standards". The Applicant and Cambs CC are asked to detail how discussions are progressing in relation to lighting arrangements and how the Development Proposal is being future proofed.	The Applicant met with Cambridgeshire County Council as local highway authority on 24 November 2022 to discuss the proposals for street lighting along New Bridge Lane. Following the meeting the Applicant prepared a revision to **ES Chapter 3 Description of the Proposed Development Figure 3.19i-ii (Volume 6.3) [APP-049]** which was submitted to CCC on 10 January 2023. The Applicant has not received any comments from CCC following submission of the revised drawings**.** The drawings were submitted at Deadline 1 as **ES Chapter 3 Description of the Proposed Development Figure 3.19i-iv (Volume 6.3) [REP1-009].** **CCC and FDC's LIR (REP1-074]** at paragraph 2.7.25 states that street lighting should be provided as part of the S278/S38 works and designed to County Council specification which the Applicant assumes would be compliant with the Cambridgeshire County Council Street Lighting Specification (2016).

ExQ1	Question to	Question	Applicant Response
TT.1.9	Applicant	Cambs CC and Fenland DC RR states in para. 3.9 that the existing carriageway of New Bridge Lane is unlikely to the suitable for retention and will need to be reconstructed. Can the Applicant please provide information on how it has assessed the robustness of the existing carriageways predicted to the use during the construction and operational stages of the development? Have any been identified as being unsuitable? What is the proposed mechanisms to secure works needed?	The Proposed Access Improvements for New Bridge Lane include widening and reconstruction prior to its first use as a construction access. The Applicant's intention is for the specification to be approved by Cambridgeshire County Council (CCC) via a Section 278 Agreement. Heads of Terms for the Section 278 Agreement are being negotiated with CCC. The Applicant has not undertaken any structural surveys of the wider, local highway network. The highways (other than New Bridge Lane east of the Disused March to Wisbech Railway) which would be used to access the Proposed Development for construction and operation are commonly used by HGV traffic given that the EfW CHP Facility Site is an existing waste management facility located within an existing industrial estate in close proximity to the strategic road network. The Applicant does propose to undertake highway condition surveys. **ES Chapter 6 Traffic and Transport Appendix 6A Outline Construction Traffic Management Plan (Volume 6.4) [REP1-011]** Sections 7.4.19 to 7.4.22 provides more information on the approach to be adopted and confirms that the Applicant will undertake video surveys as requested by Norfolk County Council and that the surveys will be undertaken by an independent contractor as requested by Cambridgeshire County Council. The Outline CTMP records that repairs will be made where necessary. The Outline CTMP is secured by **Draft DCO Requirement 11 (Volume 3.1) [REP1-007].**
TT.1.10	Applicant Cambs CC	Can the Applicant and the Highways Authority please provide further information on how the recent decisions in relation to the A47/A11 Thickthorn Junction DCO, the A47 Blofield to North Burlingham DCO, the A47 North Tuddenham to Easton DCO have been considered as part of the proposed development?	The consented DCO applications on the A47 are located a considerable distance away from the Proposed Development and associated Study Area. The A47/A11 Thickthorn Junction DCO is located to the south-west of Norwich approximately 80km from the Proposed Development. The A46 Blofield to North Burlingham DCO is located to the east of Norwich approximately 99km from the Proposed Development. The A47 North Tuddenham to Easton DCO is to the east of Norwich approximately 60km from the Proposed Development.

ExQ1	Question to	Question	Applicant Response
			It is considered that these applications will not have a material impact on the Proposed Development and therefore have not been considered further.
TT.1.13	Applicant	Cambs CC and Fenland DC RR states, in para. 3.28 state the legal status of the different named roads included in the Access and Public Rights of Way Plan [APP-008] is not clearly shown. The Applicant is asked to submit a revised version of the Access and Public Rights of Way Plan that clearly indicates the legal status of the roads (i.e. whether or not they form part of the public highway).	The Applicant had previously discussed the comments raised within Cambridgeshire County Council and Fenland District Council's prior to the publication of the relevant representation. The revised version of the **Access and Public Rights of Way Plan (Volume 2.4) [REP1-005]** was submitted at Deadline 1 to show the Highway Authorities for streets maintained at public expense.



Medworth Energy from Waste
Combined Heat and Power Facility

PINS ref. EN010110
Document Reference: Vol 10.2
Revision: 1.0
Deadline: 2
March 2023

Applicant's response to the ExA's Written Questions (ExQ1) – Appendices

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Medworth Energy from Waste
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Applicant's response to the ExA's Written Questions (ExQ1) – Appendix 10.2A Application Index

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Appendix 10.2A

Response to GCT 1.2

1.1.1 The ExA asked the following question:

Several Appendixes have been submitted in support of the DCO application with some of the appendixes being grouped together and submitted as individual documents. For those documents that hold more than one technical appendix, e.g. [APP-075], [APP-076], [APP- 078], [APP-079], [APP-080], [APP-081], [APP-081], [APP-083], [APP-085], [APP-087], [App-088], [APP-089], [APP-090] the Applicant is asked to prepare and submit an Appendix Index for each one of the documents, with hyperlinks, in order to assist the ExA in the navigation of the document itself.

1.1.2 **Table 10.2A** below provides an Appendix index and hyperlinks to each of the Appendices published on the project page of the Planning Inspectorate's website.

Table 10.2A Appendix Index

Doc Ref (Vol)	Examination library reference	Document	Appendix	Hyperlink
5.1	APP-019	Consultation Report Appendix A to B	Appendix A EIA Scoping Report and Regulation 8(1)(b) letter	https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010110/EN010110-000432-MVV%20Volume%205.1%20Consultation%20Report%20Appendices%20A%20-%20B.pdf#page=1
5.1	APP-019	Consultation Report Appendix A to B	Appendix B Stage 1 Consultation Feedback Report	https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010110/EN010110-000432-MVV%20Volume%205.1%20Consultation%20Report%20Appendices%20A%20-%20B.pdf#page=258
5.1	APP-020	Consultation Report Appendix C to M	Appendix C Stage 1b Consultation Feedback Report	https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010110/EN010110-000433-

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				MVV%20Volume%205.1%20Consultation%20Report%20Appendix%20C%20to%20M%20low%20res.pdf#page=1
5.1	APP-020	Consultation Report Appendix C to M	Appendix D Draft SoCC Cover Letter	https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010110/EN010110-000433-MVV%20Volume%205.1%20Consultation%20Report%20Appendix%20C%20to%20M%20low%20res.pdf#page=121
5.1	APP-020	Consultation Report Appendix C to M	Appendix E Responses received to Draft SoCC	https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010110/EN010110-000433-MVV%20Volume%205.1%20Consultation%20Report%20Appendix%20C%20to%20M%20low%20res.pdf#page=124

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5.1	APP-020	Consultation Report Appendix C to M	Appendix F Notice of the SoCC in newspapers	https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010110/EN010110-000433-MVV%20Volume%205.1%20Consultation%20Report%20Appendix%20C%20to%20M%20low%20res.pdf#page=137
5.1	APP-020	Consultation Report Appendix C to M	Appendix G S46 Notification by the Applicant to SoS	https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010110/EN010110-000433-MVV%20Volume%205.1%20Consultation%20Report%20Appendix%20C%20to%20M%20low%20res.pdf#page=147
5.1	APP-020	Consultation Report Appendix C to M	Appendix H S42 S44 List of Consultees and Notification Letters	https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010110/EN010110-000433-MVV%20Volume%205.1%20Consultation%20Report%20

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5.1	APP-020	Consultation Report Appendix C to M	Appendix I S48 Notices	https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010110/EN010110-000433-MVV%20Volume%205.1%20Consultation%20Report%20Appendix%20C%20to%20M%20low%20res.pdf#page=209
5.1	APP-020	Consultation Report Appendix C to M	Appendix J Stage 1 Consultation Strategy	https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010110/EN010110-000433-MVV%20Volume%205.1%20Consultation%20Report%20Appendix%20C%20to%20M%20low%20res.pdf#page=234

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5.1	APP-020	Consultation Report Appendix C to M	Appendix L Grid Connection Corridor Options Report	https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010110/EN010110-000433-MVV%20Volume%205.1%20Consultation%20Report%20Appendix%20C%20to%20M%20low%20res.pdf#page=268
5.1	APP-020	Consultation Report Appendix C to M	Appendix M Final Statement of Community Consultation	https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010110/EN010110-000433-MVV%20Volume%205.1%20Consultation%20Report%20

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				Appendix%20C%20to%20M%20low%20res.pdf#page=306
5.1	APP-021	Consultation Report Appendix N to II	Appendix N Consultation Invitation Flyer	https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010110/EN010110-000430-MVV%20Volume%205.1%20Consultation%20Report%20Appendix%20N%20to%20II.pdf#page=1
5.1	APP-021	Consultation Report Appendix N to II	Appendix O Consultation Posters	https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010110/EN010110-000430-MVV%20Volume%205.1%20Consultation%20Report%20Appendix%20N%20to%20II.pdf#page=4
5.1	APP-021	Consultation Report Appendix N to II	Appendix P Project Website	https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/

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				EN010110/EN010110-000430-MVV%20Volume%205.1%20Consultation%20Report%20Appendix%20N%20to%20II.pdf#page=6
5.1	APP-021	Consultation Report Appendix N to II	Appendix Q S48 Notices to Consultation Bodies	https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010110/EN010110-000430-MVV%20Volume%205.1%20Consultation%20Report%20Appendix%20N%20to%20II.pdf#page=31
5.1	APP-021	Consultation Report Appendix N to II	Appendix R Stakeholders Consulted during Stage 2 Statutory Consultation	https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010110/EN010110-000430-MVV%20Volume%205.1%20Consultation%20Report%20Appendix%20N%20to%20II.pdf#page=33

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5.1	APP-021	Consultation Report Appendix N to II	Appendix T Photographs of Banner Posters	https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010110/EN010110-000430-MVV%20Volume%205.1%20Consultation%20Report%20Appendix%20N%20to%20II.pdf#page=43
5.1	APP-021	Consultation Report Appendix N to II	Appendix U Public Exhibition Advertisements	https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010110/EN010110-000430-MVV%20Volume%205.1%20Consultation%20Report%20

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				Appendix%20N%20to%20II.pdf#page=52
5.1	APP-021	Consultation Report Appendix N to II	Appendix V Correction poster for Walton Highway Village Club	https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010110/EN010110-000430-MVV%20Volume%205.1%20Consultation%20Report%20Appendix%20N%20to%20II.pdf#page=66
5.1	APP-021	Consultation Report Appendix N to II	Appendix W Consultation Zone	https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010110/EN010110-000430-MVV%20Volume%205.1%20Consultation%20Report%20Appendix%20N%20to%20II.pdf#page=69
5.1	APP-021	Consultation Report Appendix N to II	Appendix X Interactive Webpage	https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/

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5.1	APP-021	Consultation Report Appendix N to II	Appendix Y HRA Draft Screening Report and HRA Clarification Note	https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010110/EN010110-000430-MVV%20Volume%205.1%20Consultation%20Report%20Appendix%20N%20to%20II.pdf#page=75
5.1	APP-021	Consultation Report Appendix N to II	Appendix Z Photographs of Posters at Document Inspection Locations	https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010110/EN010110-000430-MVV%20Volume%205.1%20Consultation%20Report%20Appendix%20N%20to%20II.pdf#page=204

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5.1	APP-021	Consultation Report Appendix N to II	Appendix AA Stage 2 Statutory Consultation Booklet	https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010110/EN010110-000430-MVV%20Volume%205.1%20Consultation%20Report%20Appendix%20N%20to%20II.pdf#page=214
5.1	APP-021	Consultation Report Appendix N to II	Appendix BB Consultation Feedback form	https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010110/EN010110-000430-MVV%20Volume%205.1%20Consultation%20Report%20Appendix%20N%20to%20II.pdf#page=238
5.1	APP-021	Consultation Report Appendix N to II	Appendix CC S46 Acknowledgment	https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010110/EN010110-000430-MVV%20Volume%205.1%20Consultation%20Report%20

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5.1	APP-021	Consultation Report Appendix N to II	Appendix GG Stage 1 Consultation Events Postponement Publicity	https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010110/EN010110-000430-MVV%20Volume%205.1%20Consultation%20Report%20Appendix%20N%20to%20II.pdf#page=263
5.1	APP-021	Consultation Report Appendix N to II	Appendix HH Local Authority Boundaries map	https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010110/EN010110-000430-MVV%20Volume%205.1%20Consultation%20Report%20Appendix%20N%20to%20II.pdf#page=264

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5.1	APP-021	Consultation Report Appendix N to II	Appendix II Online Advertisements	https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010110/EN010110-000430-MVV%20Volume%205.1%20Consultation%20Report%20Appendix%20N%20to%20II.pdf#page=266
5.1	APP-022	Consultation Report Appendix JJ	Appendix JJ Summary Issue Tables	https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010110/EN010110-000429-MVV%20Volume%205.1%20Consultation%20Report%20Appendix%20JJ.pdf
5.1	APP-023	Consultation Report Appendix H	Consultation Report: Appendix H (Confidential)	https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010110/EN010110-000428-MVV%20Volume%205.1%20Consultation%20Report%20

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6.4	APP-068	ES Chapter 1 Introduction Appendices	Appendix 1A List of Competent Experts	https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010110/EN010110-000511-MVV%20Volume%206.4%20ES%20Chapter%201%20Introduction%20Appendices.pdf#page=1
6.4	APP-068	ES Chapter 1 Introduction Appendices	Appendix 1B Applicant's Confirmation of Technical Experts	https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010110/EN010110-000511-MVV%20Volume%206.4%20ES%20Chapter%201%20Introduction%20Appendices.pdf#page=11

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6.4	APP-068	ES Chapter 1 Introduction Appendices	Appendix 1C Regulation 8(1) (B) Notice	https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010110/EN010110-000511-MVV%20Volume%206.4%20ES%20Chapter%201%20Introduction%20Appendices.pdf#page=15
6.4	APP-068	ES Chapter 1 Introduction Appendices	Appendix 1D EIA Scoping Opion	https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010110/EN010110-000511-MVV%20Volume%206.4%20ES%20Chapter%201%20Introduction%20Appendices.pdf#page=21
6.4	APP-068	ES Chapter 1 Introduction Appendices	Appendic 1E Late Scoping Consultaiton Response	https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010110/EN010110-000511-MVV%20Volume%206.4%20ES%20Chapter%201%20Intr

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6.4	APP-068	ES Chapter 1 Introduction Appendices	Appendix 1F Terms and Abbreviations	https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010110/EN010110-000511-MVV%20Volume%206.4%20ES%20Chapter%201%20Introduction%20Appendices.pdf#page=247
6.4	APP-069	ES Chapter 2 Alternatives Appendices	Appendix 2A Grid Connection Options Report	https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010110/EN010110-000512-MVV%20Volume%206.4%20ES%20Chapter%202%20Alternatives%20Appendices.pdf
6.4	APP-070	ES Chapter 3 Description of the Proposed Development Appendix 3A	Appendix 3A: Consultation and stakeholder engagement	https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010110/EN010110-

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				000513-MVV%20Volume%206.4%20ES%20Chapter%203%20Description%20of%20the%20Proposed%20Development%20Appendix%203A.pdf
6.4	APP-071	ES Chapter 3 Description of the Proposed Development Appendix 3B Outline Lighting Strategy	Appendix 3B Outline Lighting Strategy	https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010110/EN010110-000514-MVV%20Volume%206.4%20ES%20Chapter%203%20Description%20of%20the%20Proposed%20Development%20Appendix%203B%20Outline%20Lighting%20Strategy.pdf
6.4	APP-072	ES Chapter 6 Traffic and Transport Appendix 6A Outline Construction Traffic Management Plan	Appendix 6A Outline Construction Traffic Management Plan	https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010110/EN010110-000515-MVV%20Volume%206.4%20ES%20Chapter%206%20Traffic%20and%20Transport%20Appendix%206A%20Outline%20Construction%20Traffic

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ExQ1 Appendices - 10.2B Technical Note - IBA and APCr Sites and Capacity

Medworth Energy from Waste
Combined Heat and Power Facility

PINS ref. EN010110
Document Reference: Vol 10.2
Revision: 1
Deadline: 2
March 2023

Applicant's response to the ExA's Written Questions (ExQ1) – Appendix 10.2B Technical Note – IBA and APCr Sites and Capacity

We inspire with energy.

Contents

1. Introduction

1.1 Background

1.1.1 The EfW CHP Facility treatment process creates two principal types of waste; Incinerator Bottom Ash (IBA) and Air Pollution Control residues (APCr). **Section 3.5.38 to 3.5.41 and Sections 3.4.42 to 3.4.46, ES Chapter 3 Description of the Proposed Development (Vol 6.2) [APP-030]** describe the production and management of the IBA and APCr at the EfW CHP Facility, confirming The IBA and APCr will be exported off site to suitable licenced facilities for either further recycling, in respect of IBA, and landfill in respect of APCR (although the Applicant continues to review the market to investigate commercial opportunities to recycle or recover this waste).

1.1.2 In accordance with paragraph 2.5.77, NPS EN-3, the ES includes an assessment of the impacts associated with the production and export of IBA and APCr from the EfW CHP Facility. Further details are provided in:

- **ES Chapter 6: Traffic and Transport (Volume 6.2) [APP-033]** – see **Section 6.6.78 to 6.6.112 (Operational Phase Proposed Development Detail)**. This assessment includes estimated vehicle numbers and routes for the export of IBA and APCr;
- **ES Chapter 8: Air Quality (Volume 6.2) [APP-035]** – see **Section 8.10.3 to 8.10.5 (Air quality effects during operation)**. Confirms that traffic movements associated with the Proposed Development (including IBA and APCr) are considered within the Air Quality Assessment; and
- **ES Chapter 14: Climate (Volume 6.2) [APP-041]** – see **Section 14.9.29**. Includes an assessment of the lifetime emissions associated with the transportation of IBA and APCr.

1.2 Purpose of this Technical Note

1.2.1 Paragraph 2.5.78, NPS EN-3 and paragraph 2.18.8 of the Draft NPS-EN-3 states; "*Applicants should set out the consideration they have given to the existence of accessible capacity in waste management sites for dealing with residues for the planned life of the power station".*

1.2.2 This Technical Note expands on the Applicant's considerations of potential locations for (including capacity) IBA and APCr treatment/disposal facilities.

1.3 Structure of this Technical Note

1.3.1 This Technical Note includes the following sections:

- Section 2 – IBA treatment facilities and capacity; and
- Section 3 – APCr treatment/disposal facilities and capacity.

2. IBA treatment facilities and capacity

2.1.1 **Table 2.1** summarises IBA treatment facilities, either operational or in development, identified by the Applicant to support the Proposed Development.

Table 2.1 Summary of IBA treatment facilities and capacity

ID	Operator	Status	Site	Distance to EfW CHP Facility	Permitted Capacity	Treatment	Comment
IBA01	Johnsons Aggregates	Active site	Whittlesey, Cambridgeshire	27km	250,000tpa	**Reprocessing Secondary aggregate/metal recycling**	Environmental Permit Ref: EPR/DP3131NM
IBA02	Hanson/Mick George Group	Active site	Crimplesham, Norfolk	27km	75,000tpa	**Reprocessing Secondary aggregate/metal recycling**	Environmental Permit Ref: EPR/SP3196ES
IBA03	Hanson/Mick George Group	Active site	Snettisham Quarry King's Lynn, Norfolk	29km	75,000tpa	**Reprocessing Secondary aggregate/metal recycling**	Environmental Permit Ref: EPR/CB3033DE
IBA04	Hanson/Mick George Group	Active site	Manea, Cambridgeshire	35km	75,000tpa	**Reprocessing Secondary aggregate/metal recycling**	Environmental Permit Ref: EPR/CB3904KE

ID	Operator	Status	Site	Distance to EfW CHP Facility	Permitted Capacity	Treatment	Comment
IBA05	Hanson/Mick George Group	Active site	Worlington, Suffolk.	51km	75,000tpa	**Reprocessing Secondary aggregate/metal recycling**	Environmental Permit Ref: EPR/SP3292ED
IBA06	Hanson/Mick George Group	Active site	Waterbeach, Cambridgeshire	53km	75,000tpa	**Reprocessing Secondary aggregate/metal recycling**	Environmental Permit Ref: EPR/UP3099VB
IBA07	Hanson/Mick George Group	Active site	Carbrooke, Thetford	61km	75,000tpa	**Reprocessing Secondary aggregate/metal recycling**	Environmental Permit Ref: EPR/RP3898VC
IBA08	Johnsons Aggregates	Active site	Loughborough Road, Nottingham	114km	150,000tpa	**Reprocessing Secondary aggregate/metal recycling**	Environmental Permit Ref: EPR/CB3204UF
IBA09	Rock Solid	In development	-	-	-	**Reprocessing Secondary aggregate/metal recycling**	Active in the IBA treatment market and currently working with MVV to review suitable processing sites in the East of England.

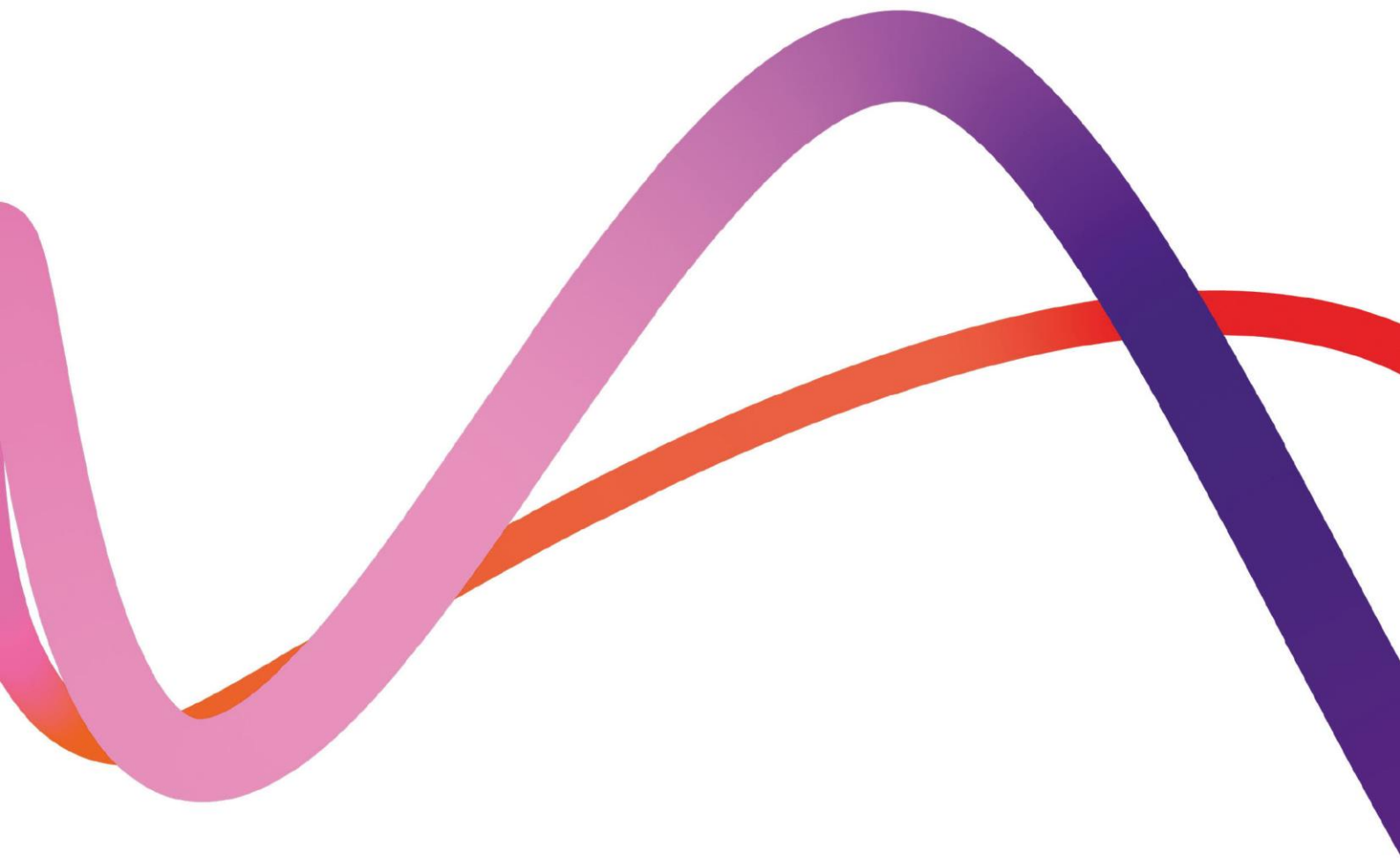
3. APCr treatment/disposal facilities and capacity

3.1.1 The APCR is transported from the EfW CHP Facility Site to a suitably licenced hazardous landfill facility; the worst-case scenario assessed for the Proposed Development. Alternatively, to move the APCr up the waste hierarchy and away from landfill, the Applicant is exploring opportunities to recycle the APCr. **Table 3.1** summarises operational APCr treatment/disposal facilities identified by the Applicant to support the Proposed Development.

Table 3.1 Summary of APCr treatment/disposal facilities and capacity

ID	Operator	Status	Site	Distance to EfW CHP Facility	Capacity	Treatment	Comment
APCr1	Augean	Active site	East Northants Resource Management Facility, Peterborough	52km	2.5 million cubic metres	Hazardous landfill	Environmental Permit Ref: EPR/RP3133PP A DCO was made on 23 February 2023 to extend operation until 2046. (SI 2023:110)
APCr2	OCO Grundon	Active site	Brandon, Suffolk	53km	180,000tpa	Treatment. (APCr is blended with controlled quantities of liquid carbon dioxide and water, chemically transforms the APCr into calcium carbonate. Gaseous carbon dioxide is injected to accelerate the cementation process, forming a rounded aggregate which is then screened and stored, the process permanently captures more	Environmental Permit Ref: EPR/JP3332FK The company currently processes 180,000 tonnes a year of APCr and are currently investing more than £25m to increase capacity to 400,000tpa.

ID	Operator	Status	Site	Distance to EfW CHP Facility	Capacity	Treatment	Comment
						carbon dioxide than is associated with the production cycle; a carbon negative product).	
APCr3	OCO Grundon	In Development	Wretham, Norfolk	61km	30,000tpa	Treatment. As APCr2.	Environmental Permit Ref: EPR/QP3822XA
APCr4	Castle Environmental	Active Site	Ilkeston, Derbyshire	140km	200,000tpa	Treatment.	Environmental Permit Ref: EPR/AP3337SJ



ExQ1 Appendices - 10.2C Biodiversity Net Gain - Next Steps

Medworth Energy from Waste
Combined Heat and Power Facility

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March 2023

Applicant's response to the ExA's Written Questions (ExQ1) - Appendix 10.2C: Biodiversity Net Gain – Next Steps

Update March 2023

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Contents

1. Introduction

1.1 Background

1.1.1 **Environmental Statement (ES) Chapter 11 Biodiversity Appendix 11M Biodiversity Net Gain Assessment (BNG) - Rev 2 (Volume 6.4) [AS-009]** includes an assessment of the change in biodiversity units for the Proposed Development to understand the type of habitats required by the Applicant to deliver a 10% BGN commitment for the Proposed Development.

1.1.2 In addition to habitat creation associated with the delivery of the **Outline Landscape and Ecology Strategy (Figure 3.14, Volume 6.3) (Rev 2** submitted at Deadline 2) on the EfW CHP Facility Site, the Applicant has several options through which its commitment to delivering BNG could be achieved on-site (i.e., within the Order limits) and/or off-site, using any, or a combination of these.

1.1.3 The Applicant's BNG commitments are secured by **Draft DCO** Requirement 6 **(Volume 3.1) [REP1-007]** which states:

"Biodiversity net gain

(1) No part of the authorised development may commence until a biodiversity net gain strategy has been submitted to and approved by the relevant planning authority, in consultation with the relevant statutory nature conservation body.

The biodiversity net gain strategy must be implemented as approved under sub-paragraph ***Error! Reference source not found.****."*

1.2 Purpose of this report

1.2.1 **Section 4.2** of the **BNG Assessment (Volume 6.4) [AS-009]** summarised the next steps the Applicant would take to investigate potential BNG opportunities to deliver a 10% net gain. This document reports on progress.

1.3 Structure of this report

1.3.1 The report is structured into the following sections:

- Section 2 – Summary of the 10% BNG requirements;
- Section 3 – Summary of 3rd party engagement; and
- Section 4 – Next steps.

2. Summary of BNG proposals

2.1.1 **Table 2.1** summarises the results of the **BNG Assessment (Volume 6.4) [AS-009]**. It shows the: baseline units; post intervention units (i.e., once habits have been reinstated/created on-site as per the **Outline Landscape and Ecology Strategy (Figure 3.14, Volume 6.3) (Rev 2** submitted at Deadline 2) and the additional units required (i.e., habitat compensation provided off-site) to achieve the target 10% BNG across area-based habitat, linear habitat and river habitat units, while meeting the BNG trading rules.

Table 2.1 Summary of BNG units required for the Proposed Development

BNG Unit type	On-site baseline (units)	On-site post-intervention (units)	On-site net % change (units/(%))	10% uplift on baseline (units)	Units required to achieve 10% gain (units)*
Area-based habitat units	36.42	32.78	-3.63 (-9.98%)	3.642	**7.272**
Linear habitat units	4.71	3.69	-1.02 (-21.56%)	0.471	**1.491**
River habitat units	1.77	1.56	-0.21 (-11.85%)	0.177	**0.387**

*** = on-site net change +/- 10% uplift on baseline**

2.1.2 The following modelling provides example scenarios for achieving 10% BNG through habitat compensation provided off-site. This assumes that the off-site habitat baseline does not have strategic significance and is within the same Local Planning Authority.

Area-based habitat unit modelling:

- ***Enhancing*** 1.5ha of mixed scrub from poor to good condition would generate a net change of approximately 8.4 area-based units resulting in 13.1% net gain; or
- ***Creating*** 1.2ha of mixed scrub (in good condition) from modified grassland (in poor condition) would generate a net change of approximately 7.68 area-based units resulting in 11.13% net gain.
- **Linear habitat unit modelling:**
- ***Enhancing*** 0.3km of native hedgerow in poor condition, into native hedgerow with trees in good condition would generate a net change of approximately 2.10 linear units resulting in 23.05% net gain; or

- ***Enhancing*** 0.5km of native hedgerow in poor condition, into native hedgerow in good condition would generate a net change of approximately 1.67 linear units resulting in 13.98% net gain; or
- ***Creating*** 0.3km of native hedgerows with trees in good condition would generate a net change of approximately 1.77 linear units resulting in 15.92% net gain.
- **River habitat unit modelling:**
- ***Enhance*** 0.4km of ditch in poor condition to good condition, produces a gain of 0.4 units resulting in an overall net gain of 10.91%. Assumes ditches are outside of catchment.

2.1.3 The above summary of the example habitat measures to deliver 10% BNG for the Proposed Development was used as the basis for discussion with 3rd parties.

2.1.4 Depending on the habitat baseline of any land considered for off-site habitat compensation, alternative types of habitat creation and/or enhancement could also be used to provide 10% BNG while meeting the BNG trading rules.

3. Summary of 3rd party engagement

3.1.1 Based on **Section 4.2** of the **BNG Assessment (Volume 6.4) [AS-009]**, **Table 3.1** comments on the actions taken to date by the Applicant to investigate opportunities for delivering BNG.

Table 3.1 Summary of actions to investigate BNG delivery options

ID	'Next Steps'	Comments
NS01	Agreements with third-party landowners/managers to manage land for a period of 30-years after completion of the works to achieve net gain across one or more habitats, by improving the habitat (or linear feature) distinctiveness and/or condition, preferably on land local to the EfW CHP Facility Site.	Currently being explored by the Applicant, See **Appendix A**.
NS02	Manage existing non-operational land that may be available within the Applicant's land holdings for a period of 30 years after completion of the works as described above.	9 New Bridge Lane is owned by the Applicant and could provide a small plot for BNG.
NS03	Purchase of land dedicated to be managed for BNG for a period of 30-years after completion of the works as described above.	No update.
NS04	Agreements with local stakeholders such as the host authorities, the Natural Cambridgeshire nature partnership, or the local Wildlife Trust, to contribute to strategic local nature conservation initiatives.	Currently being explored by the Applicant, See **Appendix A**.
NS05	Input to a generic biodiversity offset scheme through the purchase of biodiversity units to deliver off-site BNG.	Currently being explored by the Applicant, See **Appendix A**.
NS06	[x]	Applicant remains open to new ideas and initiatives.

4. Next Steps

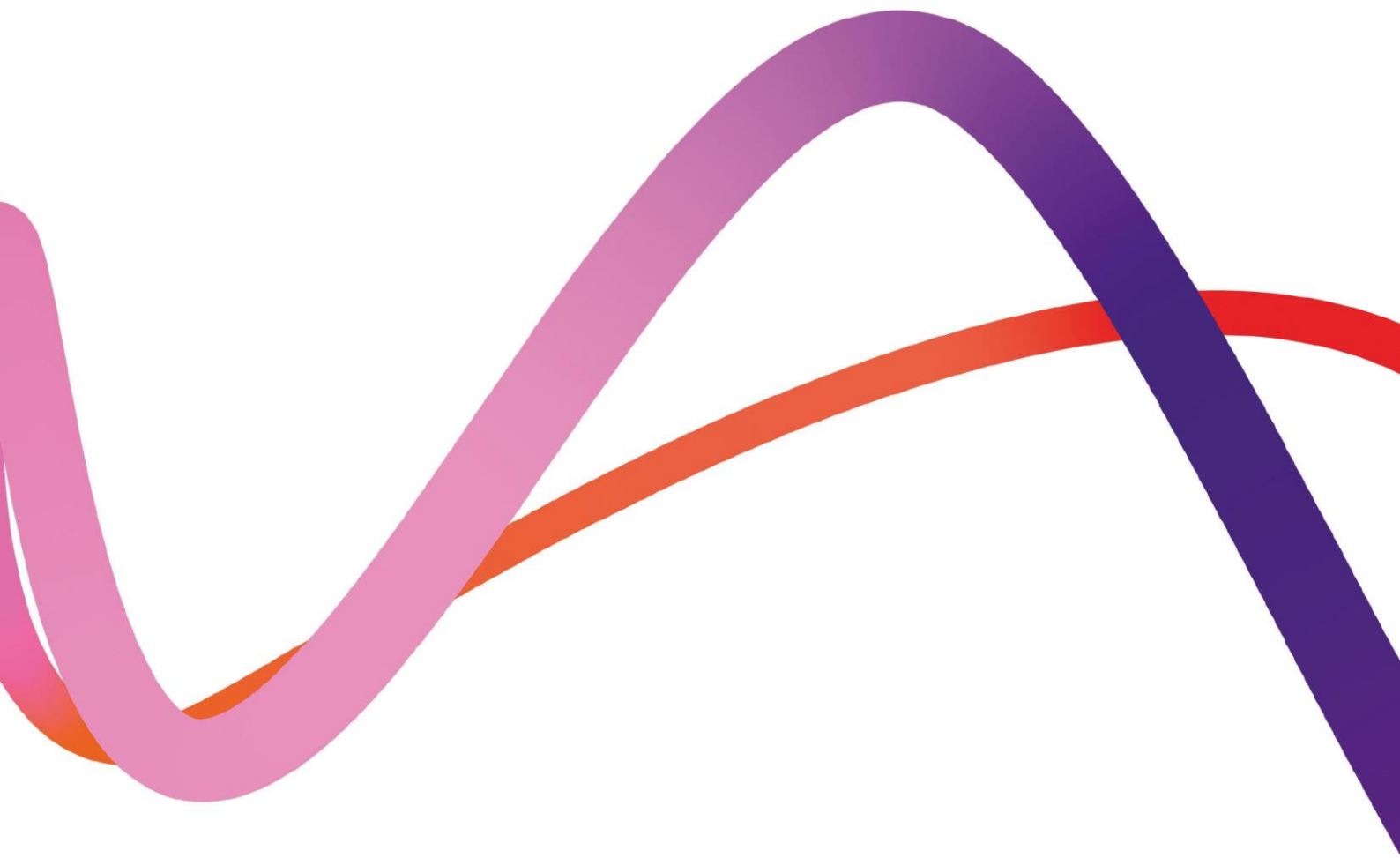
4.1.1 The Applicant has commenced their investigations of potential opportunities to deliver the Proposed Development's 10% BNG commitment. These investigations continue, see **Section 3**.

Appendix A BNG correspondence log

Organisation	Date		Comment	Status
Wildfowl and Wetland Trust	07/10/2022	Email	Enquiry sent to the Trust to understand if any nature conservation initiatives could benefit from the Proposed Development's off-site BNG contributions.	Closed
Bedfordshire, Cambridgeshire & Northamptonshire Wildlife Trust	17/10/2022	Virtual meeting	Meeting to present a summary of the Proposed Development and the Applicant's 10% BNG commitment. Understand if the Trust were involved in any local projects that could benefit from the Applicant's BNG Units. A potential project maybe emerging in the near future but nothing concrete at this time. The Trust directed the Applicant to the RSPB and Wildfowl and Wetland Trust (Welney).	Closed
RSPB	10/10/2022	Email	Enquiry sent to RSPB to understand if any nature conservation initiatives could benefit from the Proposed Development's off-site BNG contributions.	Closed
Wildfowl and Wetland Trust	18/10/2022	Email	Further enquiry sent to the Trust to understand if any nature conservation initiatives could benefit from the Proposed Development's off-site BNG contributions. Email correspondence to arrange a meeting.	Closed
RSPB	19/10/2022	Email	To undertake due diligence, requested further details of the Proposed Development. RSPB actively assessing what projects could be available for BNG, but the assessment has not been completed. However, a wetland restoration project on the	Closed

Organisation	Date		Comment	Status
			Norfolk/Suffolk/Cambridgeshire border may be in a position to offer BNG credits in the future.	
RSPB	19/10/2022	Email	Applicant issued further information to enable the RSPB to undertake their due diligence.	**Awaiting response**
Wildfowl and Wetland Trust	25/10/2022	Virtual meeting	Meeting to present a summary of the Proposed Development and the Applicant's 10% BNG commitment. Understand if the Trust were involved in any local projects that could benefit from the Applicant's BNG units. A potential project maybe emerging in the near future. Agreed to arrange a further meeting once the Trust had sought further feedback from its members. Applicant to invite their ecologist to review the BNG unit requirements and provide further background advice. After the meeting, the applicant issued further background information to inform the Trust of the Proposed Development and potential available BNG units.	Closed
Wildfowl and Wetland Trust	12/12/2022	Virtual meeting	Applicant issued a summary of BNG Unit requirements for the Trust to consider. The Trust are waiting for feedback, therefore further meeting arranged for January 2023.	Closed
Wildfowl and Wetland Trust	16/01/2023	Virtual meeting	A potential project was discussed to understand if the BNG units required for the Proposed Development might be available. Whilst the Linear and River habitats might be able at the potential project, Area-based habitats were not. Therefore, it was agreed that the Applicant would review if the potential project could be a viable option and revert to the Trust.	Closed

Organisation	Date		Comment	Status
Wildfowl and Wetland Trust	27/01/2023	Email	The Applicant summarised their review of the potential project, concluding that it is unlikely to stratify the Proposed Development's BNG requirements, but would be happy to discuss other potential future projects the Trust are involved in.	Closed
Commercial organisation	07/02/2023	Virtual meeting	To review potential opportunities to deliver BNG units. Discussions ongoing.	**Open**
Commercial organisation	15/03/2023	Email	Potential opportunities available to the Applicant to deliver (in-part) BNG.	**Open**
Host authorities: Cambridgeshire County Council, Fenland District Council and Norfolk County Council	21/03/2023	Email	The Applicant requested a meeting to discuss potential opportunities for off-site BNG delivery.	**Open**
Natural England	21/03/2023	Email	The Applicant requested a meeting to discuss potential opportunities for off-site BNG delivery.	**Open**
[x]				



ExQ1 Appendices - 10.2D DIO Correspondence

Medworth Energy from Waste
Combined Heat and Power Facility

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March 2023

Applicant's response to the ExA's Written Questions (ExQ1) – Appendix 10.2D – DIO Correspondence

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From: [redacted] DIO Estates-SafegdgMgr1)
To: [redacted]
Subject: 20210505_Medworth_EfW_CHP_Facility
Date: 05 May 2021 16:52:12

Good Afternoon Tim,

Sorry for the delay and thank you por your email.

I can confirm that your response addresses MOD requirements as stated in our response to the scoping request consultation dated 03/01/2020,

I look forward to hearing from you at the formal Statutory Consultation stage.

Kindest regards

Teena Oulaghan

Safeguarding Manager
Estates – Safeguarding

Due to covid-19 I am working from home until further notice.

In line with the latest guidance, I am working offline where possible to ease the pressure on the IT network, so I will only be checking emails and Skype periodically. This means I might not respond as promptly as usual, so if you need my attention more urgently, please call me on 07970170934.

Defence Infrastructure Organisation

Building 49, DIO Sutton Coldfield, Kingston Road, B75 7RL

Mobile Tel: [redacted] .

Website: www.gov.uk/dio/ | **Twitter**: @mod_dio

Read DIO's blog: https://insidedio.blog.gov.uk/

Defence Infrastructure Organisation

From: Tim Marks [redacted]
Sent: 21 April 2021 17:08
To: DIO-Safeguarding-Statutory (MULTIUSER) <[redacted]
Subject: Medworth EfW CHP Facility - DIO ref DIO10047037

Dear Teena,

Your reference: DIO10047037
Proposal: Application by MVV Environment Ltd (the Applicant) for an Order granting Development Consent for the Medworth Energy from Waste Combined Heat and Power Facility (the Proposed Development) - 95m Flue Stack
Location: Algores Way, Wisbech, Cambridgeshire.
Grid Ref: 545531, 307906

We write to you in response to the DIO's representation to the Planning Inspectorate dated 03rd January 2020 (attached) and update you on our project.

After experience a delay due to Covid, we are progressing with the project and anticipate holding Statutory Consultation in Summer 2021. We have undertaken a preliminary chimney height analysis and can confirm that our working assumption of a maximum height has reduced from 95m to 90m above ground level. We continue to review to see if we can further lower the height.

Concerning DIO's representation, we respond as follows.

ID	DIO's representation (03/01/2020)	MVV's response (21/04/2021)
DIO01	Thank you for consulting Defence Infrastructure Organisation (DIO) on the above proposed development. This application relates to a site outside of Ministry of Defence (MOD) statutory safeguarding areas (SOSA). We can therefore confirm that the MOD has no safeguarding objections to this proposal.	MVV note DIO raise no safeguarding objections.
DIO02	However, in the interests of air safety, the MOD requests that the structure is fitted with aviation warning lighting. The mast should be fitted with a minimum intensity 25 candela omni directional red flashing light or equivalent infra-red light fitted at the highest practicable point of the structure.	To minimise visual impacts, rather than a flashing light, MVV propose to fit an equivalent infra-red light at the highest practical point of the structure. Details to be secured by a suitably worded planning condition, see ID DIO03
DIO03	Whilst we have no safeguarding objections to this application, the height of the development will necessitate that aeronautical charts and mapping records are amended. DIO Safeguarding therefore requests that, as a condition of any planning permission granted, the developer must notify UK DVOF & Powerlines at the Defence Geographic Centre with the following information prior to development commencing: a. Precise location of development. b. Date of commencement of construction. c. Date of completion of construction. d. The height above ground level of the tallest structure. e. The maximum extension height of any construction equipment. f. Details of aviation warning lighting fitted to the structure(s)	MVV agree to provide the requested information by a suitably worded planning condition.

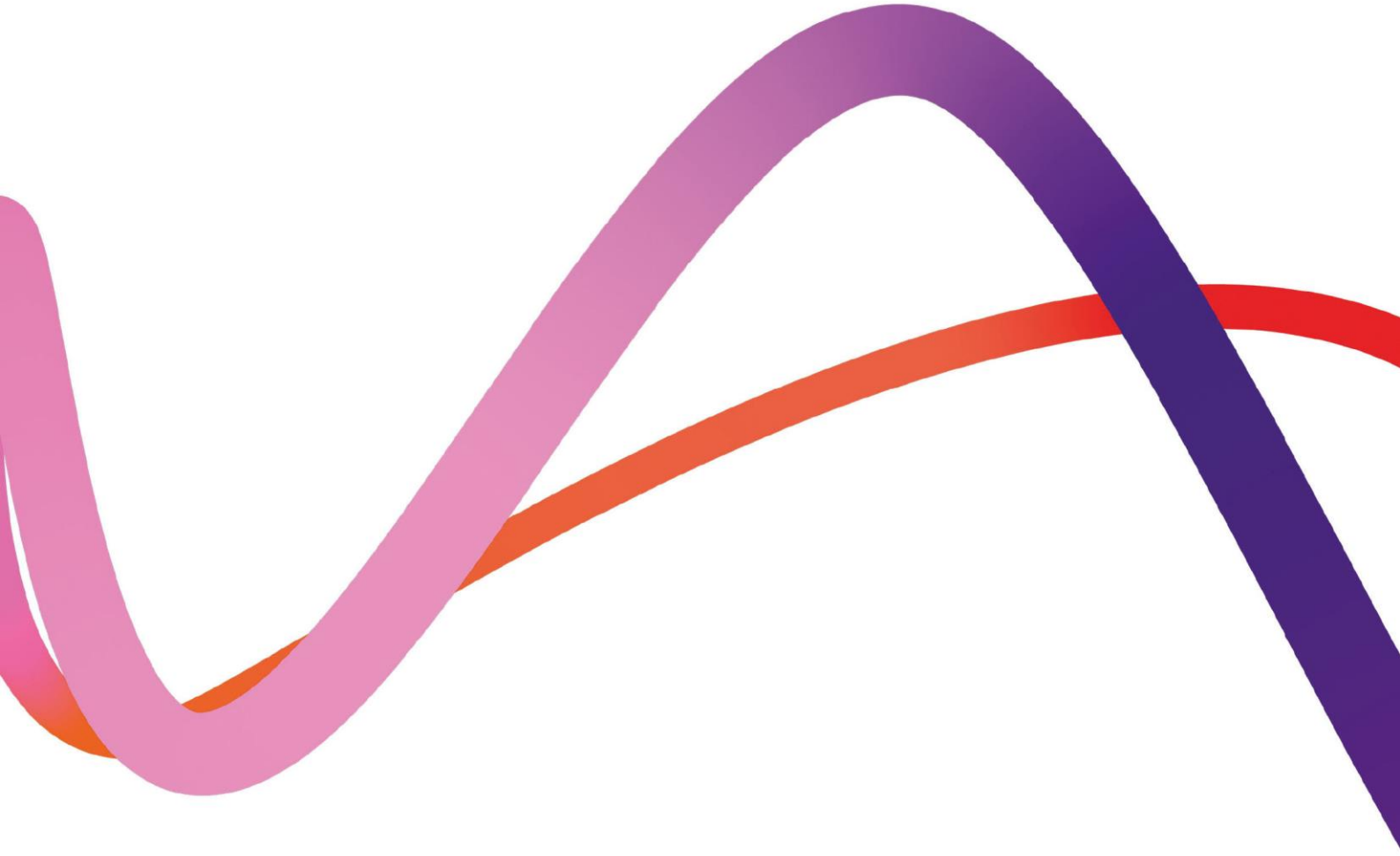
MVV shall consult DIO at the formal Statutory Consultation stage, however and in advance, it would assist us if you could confirm that our response suitably addresses your representation?

We look forward to hearing from you and please do not hesitate to contact us.

Kind regards / Mit freundlichen Grüßen

Tim Marks
Planning Manager

M: [redacted]



ExQ1 Appendices - 10.2E Human receptors in an AQMA

Medworth Energy from Waste
Combined Heat and Power Facility

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Applicant's response to the ExA's Written Questions (ExQ1) – Appendix 10.2E – Human Receptors in an AQMA

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Contents

1. Introduction

1.1 ExQ1 AQHH.1.9

1.1.1 The Examining Authority (ExA) asked the following question as part of ExQ1 **[PD-008]**:

Annex C Modelled Receptors of the ES Chapter 8 Air Quality Appendices [APP-078] provides a list of receptors and their addresses, however it does not show which are included within a AQMA. Can the Applicant provide a list of receptors which are located within an AQMA and a summary of how the Proposed Development is anticipated to affect these receptors, both during construction and operation?

1.1.2 This Appendix includes the list of receptors located within an Air Quality Management Area (AQMA).

2. Summary of Human Receptors within AQMAs

2.1.1 There are human receptors included within the air quality assessment (**ES Chapter 8 Air Quality (Volume 6.2) [APP-05])** that are found within AQMAs declared by Fenland District Council. The AQMAs which the human receptors are found within are:

- Wisbech AQMA 1 (SO_2);
- Wisbech AQMA 2 (PM_{10}); and
- Wisbech AQMA 3 (NO_2).

2.1.2 **Figure 2.1** presents these human receptors and the AQMAs on a map and **Table 2.1** below reports the human receptors found in these AQMAs.

Figure 2.1: Human receptors in an AQMA

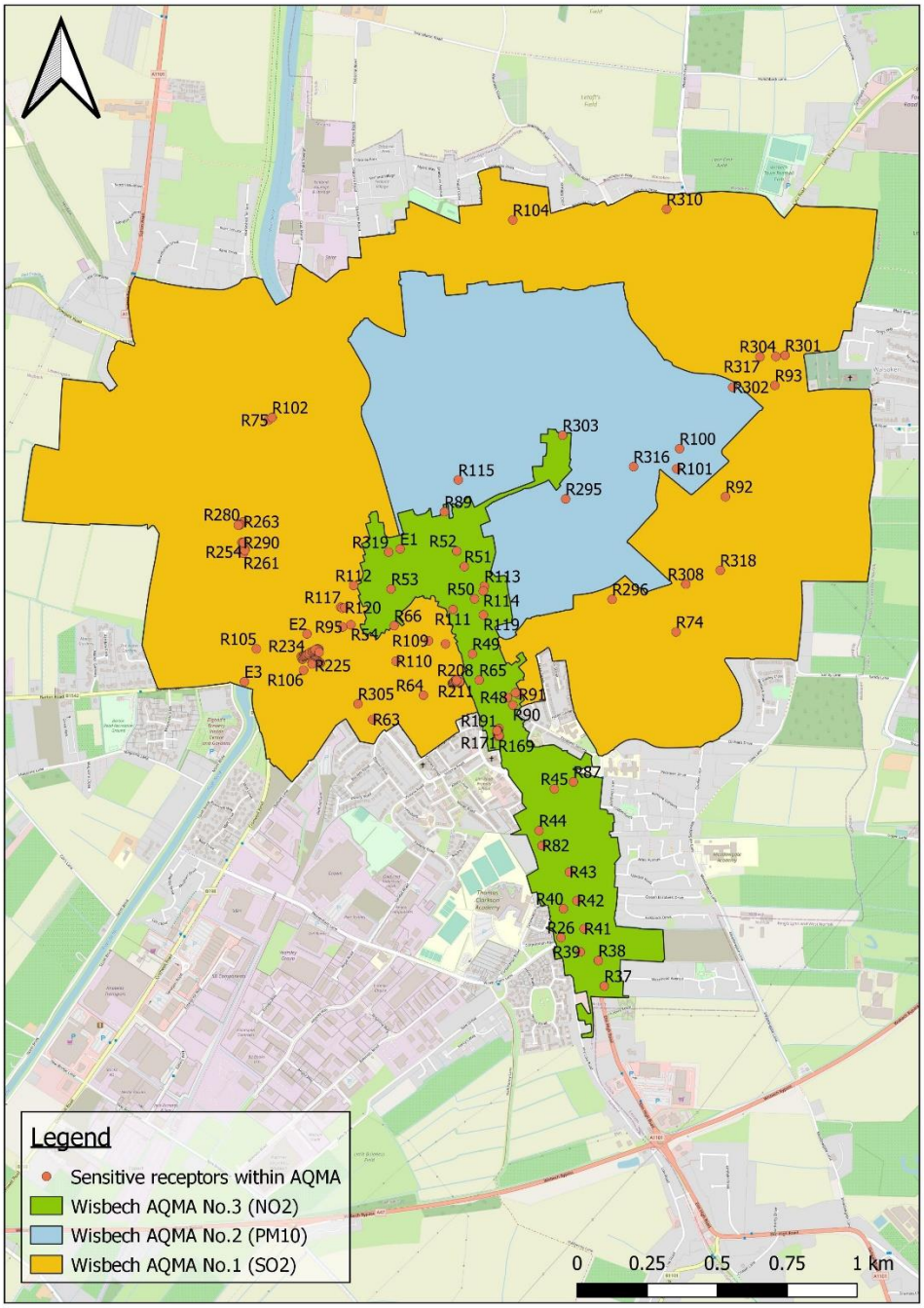

Table 2.1: Human receptors in an AQMA

ID	X	Y	AQMAs
R26	546746	308527	Wisbech AQMA No.3
R37	546906	308359	Wisbech AQMA No.3
R38	546882	308449	Wisbech AQMA No.3
R39	546817	308478	Wisbech AQMA No.3
R40	546752	308630	Wisbech AQMA No.3
R41	546828	308561	Wisbech AQMA No.3
R42	546799	308660	Wisbech AQMA No.3
R43	546769	308761	Wisbech AQMA No.3
R44	546657	308905	Wisbech AQMA No.3
R45	546707	309055	Wisbech AQMA No.3
R47	546503	309264	Wisbech AQMA No.3
R48	546530	309375	Wisbech AQMA No.1 Wisbech AQMA No.3
R49	546400	309526	Wisbech AQMA No.1 Wisbech AQMA No.3
R50	546402	309722	Wisbech AQMA No.1 Wisbech AQMA No.2 Wisbech AQMA No.3
R51	546362	309836	Wisbech AQMA No.1 Wisbech AQMA No.2 Wisbech AQMA No.3
R52	546333	309890	Wisbech AQMA No.1 Wisbech AQMA No.2 Wisbech AQMA No.3
R53	546103	309748	Wisbech AQMA No.1 Wisbech AQMA No.3
R54	545963	309616	Wisbech AQMA No.1
R55	546303	309559	Wisbech AQMA No.1
R63	546051	309282	Wisbech AQMA No.1
R64	546230	309374	Wisbech AQMA No.1

ID	X	Y	AQMAs
R65	546427	309434	Wisbech AQMA No.1 Wisbech AQMA No.3
R66	546118	309618	Wisbech AQMA No.1
R74	547124	309626	Wisbech AQMA No.1
R75	545647	310335	Wisbech AQMA No.1
R82	546669	308852	Wisbech AQMA No.3
R87	546774	309082	Wisbech AQMA No.3
R89	546285	310028	Wisbech AQMA No.1 Wisbech AQMA No.2 Wisbech AQMA No.3
R90	546550	309349	Wisbech AQMA No.1 Wisbech AQMA No.3
R91	546569	309387	Wisbech AQMA No.1 Wisbech AQMA No.3
R92	547286	310112	Wisbech AQMA No.1
R93	547450	310513	Wisbech AQMA No.1
R95	545934	309608	Wisbech AQMA No.1
R99	546558	309393	Wisbech AQMA No.1 Wisbech AQMA No.3
R100	547117	310278	Wisbech AQMA No.1 Wisbech AQMA No.2
R101	547109	310206	Wisbech AQMA No.1 Wisbech AQMA No.2
R102	545660	310345	Wisbech AQMA No.1
R104	546498	311073	Wisbech AQMA No.1
R105	545629	309521	Wisbech AQMA No.1
R106	545799	309450	Wisbech AQMA No.1
R109	546242	309568	Wisbech AQMA No.1
R110	546128	309492	Wisbech AQMA No.1
R111	546326	309682	Wisbech AQMA No.1 Wisbech AQMA No.3
R112	545969	309757	Wisbech AQMA No.1

ID	X	Y	AQMAs
R113	546435	309768	Wisbech AQMA No.1 Wisbech AQMA No.2 Wisbech AQMA No.3
R114	546432	309751	Wisbech AQMA No.1 Wisbech AQMA No.2 Wisbech AQMA No.3
R115	546331	310143	Wisbech AQMA No.1 Wisbech AQMA No.2
R117	545925	309678	Wisbech AQMA No.1
R118	545931	309675	Wisbech AQMA No.1
R119	546435	309666	Wisbech AQMA No.1 Wisbech AQMA No.2 Wisbech AQMA No.3
R120	545940	309677	Wisbech AQMA No.1
R160	546496	309257	Wisbech AQMA No.3
R161	546497	309254	Wisbech AQMA No.3
R162	546497	309245	Wisbech AQMA No.3
R163	546498	309244	Wisbech AQMA No.3
R164	546497	309252	Wisbech AQMA No.3
R165	546499	309242	Wisbech AQMA No.3
R166	546499	309241	Wisbech AQMA No.3
R167	546498	309250	Wisbech AQMA No.3
R168	546500	309239	Wisbech AQMA No.3
R169	546500	309236	Wisbech AQMA No.3
R170	546499	309248	Wisbech AQMA No.3
R171	546496	309247	Wisbech AQMA No.3
R172	546505	309237	Wisbech AQMA No.3
R173	546499	309246	Wisbech AQMA No.3
R174	546500	309244	Wisbech AQMA No.3
R175	546501	309243	Wisbech AQMA No.3

ID	X	Y	AQMAs
R176	546501	309241	Wisbech AQMA No.3
R177	546502	309239	Wisbech AQMA No.3
R178	546503	309237	Wisbech AQMA No.3
R179	546498	309258	Wisbech AQMA No.3
R180	546498	309256	Wisbech AQMA No.3
R181	546499	309255	Wisbech AQMA No.3
R182	546499	309253	Wisbech AQMA No.3
R183	546499	309252	Wisbech AQMA No.3
R184	546500	309250	Wisbech AQMA No.3
R185	546501	309248	Wisbech AQMA No.3
R186	546501	309246	Wisbech AQMA No.3
R187	546502	309244	Wisbech AQMA No.3
R188	546502	309242	Wisbech AQMA No.3
R189	546503	309241	Wisbech AQMA No.3
R190	546504	309239	Wisbech AQMA No.3
R191	546496	309256	Wisbech AQMA No.3
R192	546355	309424	Wisbech AQMA No.1
R193	546356	309423	Wisbech AQMA No.1
R194	546357	309424	Wisbech AQMA No.1
R195	546358	309424	Wisbech AQMA No.1
R196	546357	309422	Wisbech AQMA No.1
R197	546358	309423	Wisbech AQMA No.1
R198	546355	309426	Wisbech AQMA No.1
R199	546357	309426	Wisbech AQMA No.1
R200	546331	309419	Wisbech AQMA No.1
R201	546334	309421	Wisbech AQMA No.1

ID	X	Y	AQMAs
R202	546336	309423	Wisbech AQMA No.1
R203	546333	309418	Wisbech AQMA No.1
R204	546335	309419	Wisbech AQMA No.1
R205	546338	309422	Wisbech AQMA No.1
R206	546339	309427	Wisbech AQMA No.1
R207	546340	309429	Wisbech AQMA No.1
R208	546342	309431	Wisbech AQMA No.1
R209	546339	309426	Wisbech AQMA No.1
R210	546344	309433	Wisbech AQMA No.1
R211	546344	309426	Wisbech AQMA No.1
R212	546345	309428	Wisbech AQMA No.1
R213	546347	309431	Wisbech AQMA No.1
R214	545859	309477	Wisbech AQMA No.1
R215	545856	309479	Wisbech AQMA No.1
R216	545852	309483	Wisbech AQMA No.1
R217	545848	309486	Wisbech AQMA No.1
R218	545844	309489	Wisbech AQMA No.1
R219	545841	309493	Wisbech AQMA No.1
R220	545838	309497	Wisbech AQMA No.1
R221	545837	309485	Wisbech AQMA No.1
R222	545833	309481	Wisbech AQMA No.1
R223	545828	309478	Wisbech AQMA No.1
R224	545829	309473	Wisbech AQMA No.1
R225	545837	309502	Wisbech AQMA No.1
R226	545836	309506	Wisbech AQMA No.1
R227	545834	309509	Wisbech AQMA No.1

ID	X	Y	AQMAs
R228	545831	309512	Wisbech AQMA No.1
R229	545794	309489	Wisbech AQMA No.1
R230	545792	309493	Wisbech AQMA No.1
R231	545790	309499	Wisbech AQMA No.1
R232	545795	309498	Wisbech AQMA No.1
R233	545798	309500	Wisbech AQMA No.1
R234	545802	309501	Wisbech AQMA No.1
R235	545805	309503	Wisbech AQMA No.1
R236	545808	309505	Wisbech AQMA No.1
R237	545812	309508	Wisbech AQMA No.1
R238	545815	309509	Wisbech AQMA No.1
R239	545819	309513	Wisbech AQMA No.1
R240	545830	309515	Wisbech AQMA No.1
R241	545828	309517	Wisbech AQMA No.1
R242	545833	309519	Wisbech AQMA No.1
R243	545837	309521	Wisbech AQMA No.1
R244	545840	309522	Wisbech AQMA No.1
R245	545842	309524	Wisbech AQMA No.1
R246	545845	309525	Wisbech AQMA No.1
R247	545847	309528	Wisbech AQMA No.1
R248	545851	309527	Wisbech AQMA No.1
R249	545849	309526	Wisbech AQMA No.1
R250	545847	309523	Wisbech AQMA No.1
R251	545839	309524	Wisbech AQMA No.1
R252	545853	309516	Wisbech AQMA No.1
R254	545566	309898	Wisbech AQMA No.1

ID	X	Y	AQMAs
R255	545570	309878	Wisbech AQMA No.1
R256	545566	309871	Wisbech AQMA No.1
R257	545573	309864	Wisbech AQMA No.1
R258	545578	309873	Wisbech AQMA No.1
R259	545568	309876	Wisbech AQMA No.1
R260	545564	309867	Wisbech AQMA No.1
R261	545572	309859	Wisbech AQMA No.1
R262	545577	309870	Wisbech AQMA No.1
R263	545569	309971	Wisbech AQMA No.1
R264	545557	309961	Wisbech AQMA No.1
R265	545557	309961	Wisbech AQMA No.1
R266	545557	309961	Wisbech AQMA No.1
R267	545557	309961	Wisbech AQMA No.1
R268	545557	309961	Wisbech AQMA No.1
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R270	545557	309961	Wisbech AQMA No.1
R271	545557	309961	Wisbech AQMA No.1
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R278	545557	309961	Wisbech AQMA No.1
R279	545557	309961	Wisbech AQMA No.1
R280	545557	309961	Wisbech AQMA No.1

ID	X	Y	AQMAs
R281	545557	309961	Wisbech AQMA No.1
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R284	545571	309897	Wisbech AQMA No.1
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R287	545571	309897	Wisbech AQMA No.1
R288	545571	309897	Wisbech AQMA No.1
R289	545571	309897	Wisbech AQMA No.1
R290	545571	309897	Wisbech AQMA No.1
R291	545571	309897	Wisbech AQMA No.1
R292	545571	309897	Wisbech AQMA No.1
R293	545571	309897	Wisbech AQMA No.1
R294	545571	309897	Wisbech AQMA No.1
R295	546716	310087	Wisbech AQMA No.1 Wisbech AQMA No.2
R296	546893	309735	Wisbech AQMA No.1
R301	547483	310621	Wisbech AQMA No.1
R302	547300	310502	Wisbech AQMA No.1 Wisbech AQMA No.2
R303	546698	310313	Wisbech AQMA No.1 Wisbech AQMA No.2 Wisbech AQMA No.3
R304	547451	310616	Wisbech AQMA No.1
R305	545997	309336	Wisbech AQMA No.1
R308	547154	309797	Wisbech AQMA No.1
R310	547045	311128	Wisbech AQMA No.1
R316	546955	310209	Wisbech AQMA No.1 Wisbech AQMA No.2

ID	X	Y	AQMAs
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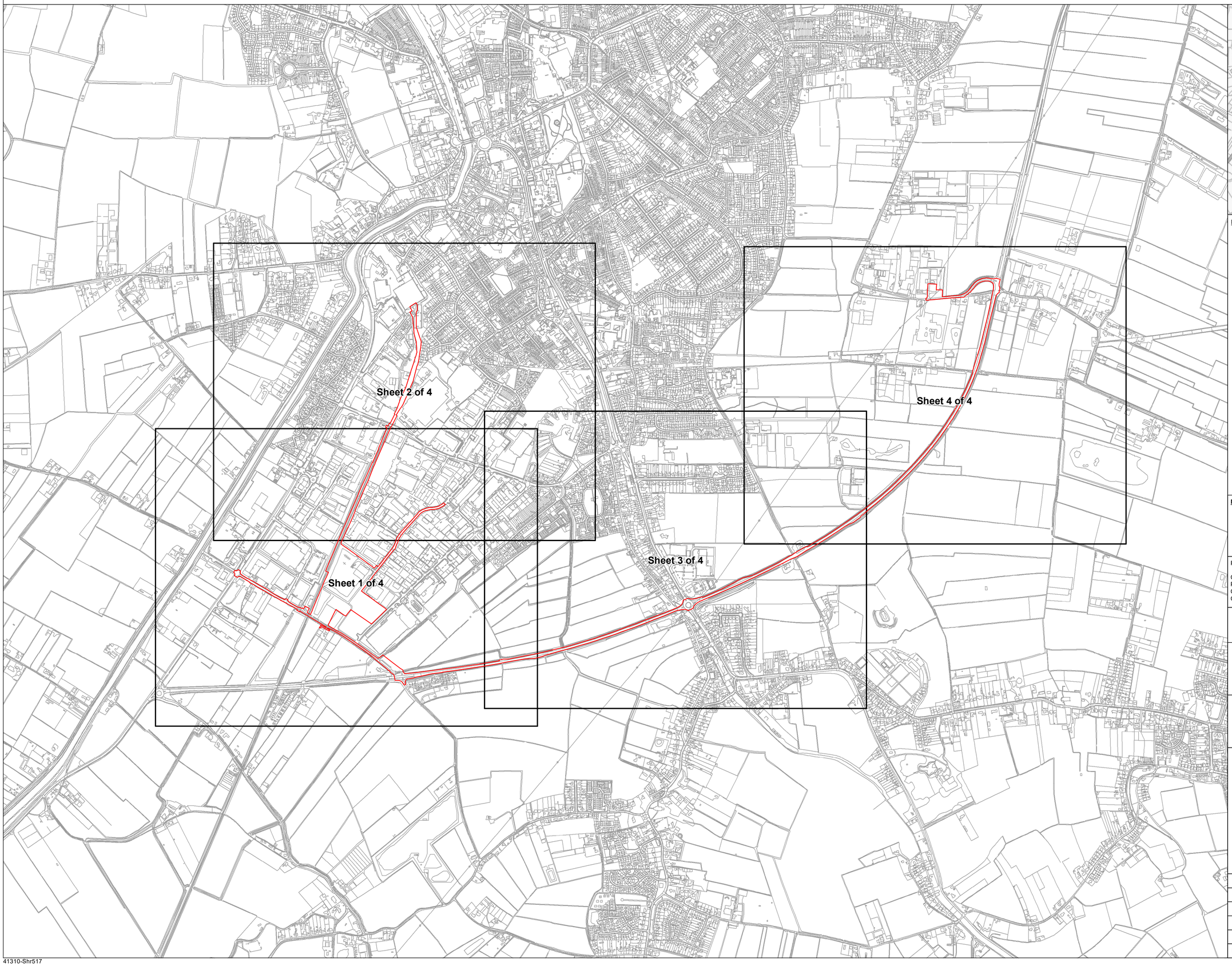
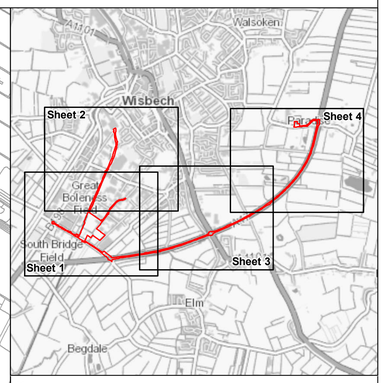
R318	547275	309850	Wisbech AQMA No.1
R319	546090	309879	Wisbech AQMA No.1 Wisbech AQMA No.3
E1	546131	309892	Wisbech AQMA No.1 Wisbech AQMA No.3
E2	545808	309580	Wisbech AQMA No.1
E3	545590	309403	Wisbech AQMA No.1

MEDWORTH ENERGY FROM WASTE COMBINED HEAT AND POWER FACILITY DCO

FEATURES OF NATURE CONSERVATION

APFP REGULATIONS: 5(2)(I)





Key

Order limits

Notes

Page Size: **A1** Scale: **1:8,000**

Coordinate System: **British National Grid**
Projection: **Transverse Mercator**
Centroid Easting: **546,790**
Centroid Northing: **308,378**

0 200 400 600 800 m

MEDWORTH CHP LIMITED

MEDWORTH ENERGY FROM WASTE COMBINED HEAT AND POWER FACILITY

FEATURES OF NATURE CONSERVATION

APFP REGULATIONS: 5(2)(I)

KEY PLAN

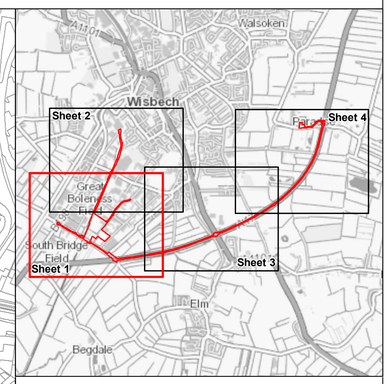
ISSUE	DATE	COMMENTS	AUT'R	CHK'D	APP'D
A	JUNE 2022	DCO SUBMISSION	S.G.	D.K.	T.M.

41310-Shr517

MEDWORTH ENERGY FROM WASTE COMBINED HEAT AND POWER FACILITY DCO

FEATURES OF NATURE CONSERVATION

APFP REGULATIONS: 5(2)(I)



Key

- Order limits
- Waterbody in a River Basin Management Plan

Designated sites

- County Wildlife Site

Priority Habitats

- Coastal and floodplain grazing marsh
- Deciduous woodland
- No main habitat but additional habitats present
- Traditional orchard

Notes

The location of statutory and non-statutory designated sites for nature conservation which lie beyond the area covered by this sheet are identified on Figure 11.2 to Chapter 11 Biodiversity (Volume 6.3).

Page Size: **A1** Scale: **1:2,500**

Coordinate System: **British National Grid**
Projection: **Transverse Mercator**
Centroid Easting: **545,561**
Centroid Northing: **307,939**

0 200 m

MEDWORTH CHP LIMITED

MEDWORTH ENERGY FROM WASTE COMBINED HEAT AND POWER FACILITY

FEATURES OF NATURE CONSERVATION

APFP REGULATIONS: 5(2)(I)

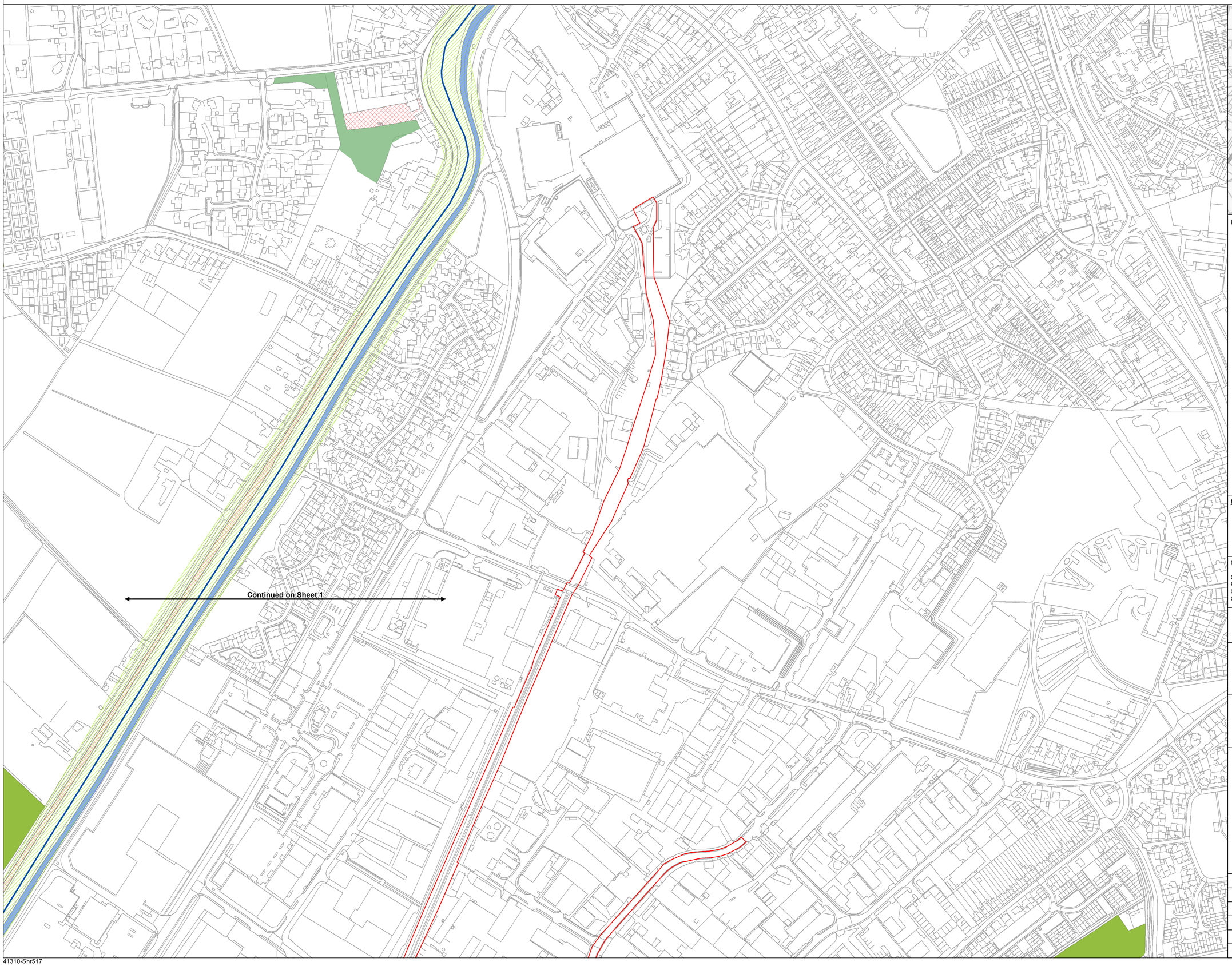
SHEET 1 OF 4

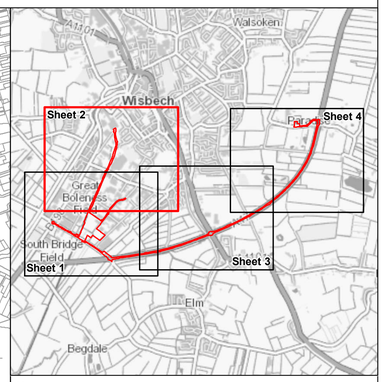
ISSUE	DATE	COMMENTS	AUT'R	CHK'D	APP'D
A	JUNE 2022	DCO SUBMISSION	S.G.	D.K.	T.M.

MEDWORTH ENERGY FROM WASTE COMBINED HEAT AND POWER FACILITY DCO

FEATURES OF NATURE CONSERVATION

APFP REGULATIONS: 5(2)(I)





Key

- Order limits
- Waterbody in a River Basin Management Plan

Designated sites

- County Wildlife Site

Priority Habitats

- Coastal and floodplain grazing marsh
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Notes

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Page Size: **A1** Scale: **1:2,500**

Coordinate System: **British National Grid**
Projection: **Transverse Mercator**
Centroid Easting: **545,826**
Centroid Northing: **308,786**

0 200 m

MEDWORTH CHP LIMITED

MEDWORTH ENERGY FROM WASTE COMBINED HEAT AND POWER FACILITY

FEATURES OF NATURE CONSERVATION

APFP REGULATIONS: 5(2)(I)

SHEET 2 OF 4

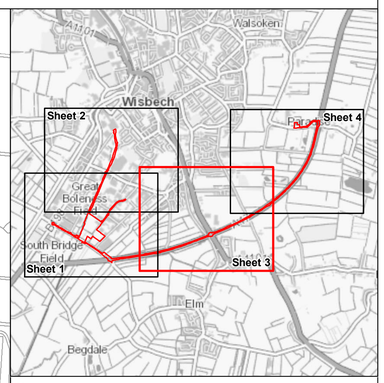
ISSUE	DATE	COMMENTS	AUT'R	CHK'D	APP'D
A	JUNE 2022	DCO SUBMISSION	S.G.	D.K.	T.M.

41310-Shr517

MEDWORTH ENERGY FROM WASTE COMBINED HEAT AND POWER FACILITY DCO

FEATURES OF NATURE CONSERVATION

APFP REGULATIONS: 5(2)(I)



Key

Order limits

Priority Habitats

Deciduous woodland

Traditional orchard

Notes

The location of statutory and non-statutory designated sites for nature conservation which lie beyond the area covered by this sheet are identified on Figure 11.2 to Chapter 11 Biodiversity (Volume 6.3).

Page Size: **A1** Scale: **1:2,500**

Coordinate System: **British National Grid**
Projection: **Transverse Mercator**
Centroid Easting: **547,064**
Centroid Northing: **308,019**

0 200 m

MEDWORTH CHP LIMITED

MEDWORTH ENERGY FROM WASTE COMBINED HEAT AND POWER FACILITY

FEATURES OF NATURE CONSERVATION

APFP REGULATIONS: 5(2)(I)

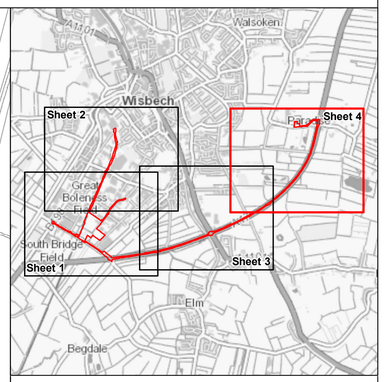
SHEET 3 OF 4

ISSUE	DATE	COMMENTS	AUT'R	CHK'D	APP'D
A	JUNE 2022	DCO SUBMISSION	S.G.	D.K.	T.M.

MEDWORTH ENERGY FROM WASTE COMBINED HEAT AND POWER FACILITY DCO

FEATURES OF NATURE CONSERVATION

APFP REGULATIONS: 5(2)(I)



Key

Order limits

Priority Habitats

Deciduous woodland

Traditional orchard

Notes

The location of statutory and non-statutory designated sites for nature conservation which lie beyond the area covered by this sheet are identified on Figure 11.2 to Chapter 11 Biodiversity (Volume 6.3).

Page Size: **A1** Scale: **1:2,500**

Coordinate System: **British National Grid**
Projection: **Transverse Mercator**
Centroid Easting: **548,249**
Centroid Northing: **308,770**

0 200 m

MEDWORTH CHP LIMITED

MEDWORTH ENERGY FROM WASTE COMBINED HEAT AND POWER FACILITY

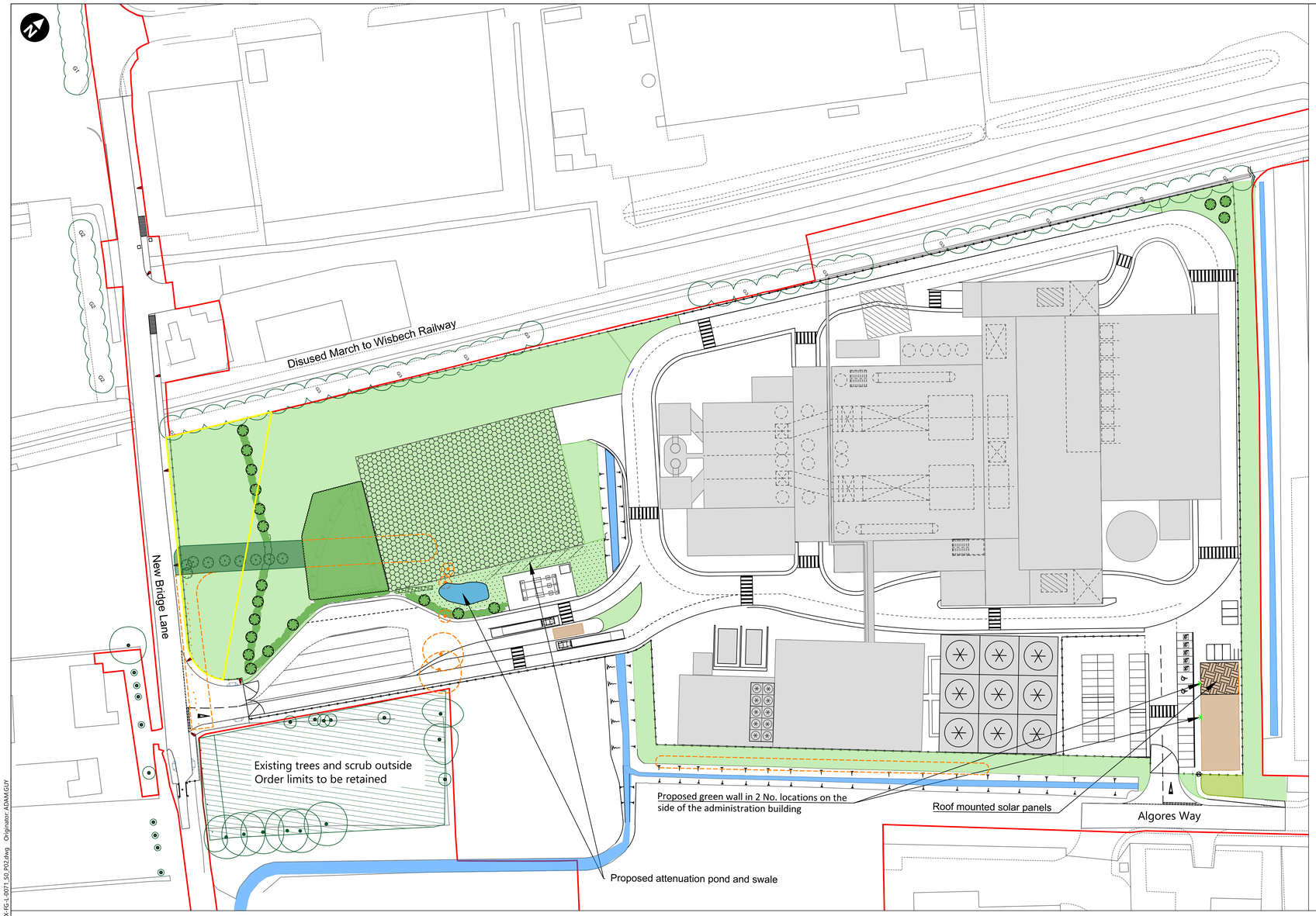
FEATURES OF NATURE CONSERVATION

APFP REGULATIONS: 5(2)(I)

SHEET 4 OF 4

ISSUE	DATE	COMMENTS	AUT'R	CHK'D	APP'D
A	JUNE 2022	DCO SUBMISSION	S.G.	D.K.	T.M.

41310-Shr517



Species rich wet grassland

% Mix	Latin Name
0.2	*Eupatorium cannabinum*
1.6	*Angelica sylvestris*
0.6	*Geum rivale*
1.2	*Galium mollugo*
1.2	*Galium verum*
1.6	*Ranunculus acris*
1.4	*Silene dioica*
0.2	*Scrophularia Nodosa*
0.4	*Lycopus europaeus*
0.6	*Juncus inflexus*
2	*Iris pseudacorus*
0.4	*Lythrum salicaria*
1.4	*Filipendula ulmaria*
0.8	*Lychnis flos-cuculi*
0.8	*Succisa pratensis*
0.8	*Carex pendula*
1.8	*Prunella vulgaris*
0.6	*Achillea ptarmica*
0.6	*Juncus effusus*
0.4	*Hypericum tetrapterum*
0.8	*Lotus uliginosus*
0.6	*Vicia cracca*
3.2	*Agrostis stolonifera*
16	*Cynosurus cristatus*
19.2	*Festuca rubra, commutata*
16	*Festuca rubra, litoralis*
2.4	*Alopecurus pratensis*
4	*Poa trivalis*
6.4	*Poa pratensis*
0.8	*Anthoxanthum odoratum*
8	*Phleum pratense ssp Bertolinii*
4	*Deschampsia cespitosa*

Species rich neutral grassland

% Mix	Latin Name
0.2	*Agrimonia eupatoria*
1.4	*Borago officinalis*
0.8	*Salvia verbenaca*
0.6	*Trifolium pratense*
0.2	*Trifolium repens*
1.6	*Agrostemma githago*
1.2	*Centaurea cyanus*
1	*Leucanthemum vulgare*
0.6	*Digitalis purpurea*
1.2	*Centaurea nigra*
1	*Centaurea scabiosa*
0.2	*Lythrum salicaria*
0.2	*Origanum vulgare*
0.2	*Geranium pratense*
1	*Malva moschata*
1	*Papaver rhoeas*
0.4	*Lychnis flos-cuculi*
1.4	*Onobrychis viciifolia*
1.4	*Knautia arvensis*
0.6	*Scabiosa columbaria*
0.2	*Dipsacus fullonum*
0.4	*Lotus corniculatus*
0.4	*Anthyllis vulneraria*
0.4	*Echium vulgare*
1	*Achillea millefolium*
1.4	*Rhinanthus minorl*
4	*Agrostis castellana*
20	*Cynosurus cristatus*
16	*Festuca ovina*
24	*Festuca rubra, litoralis*
6.4	*Poa pratensis*
9.6	*Phleum pratense ssp Bertolinii*

Species rich biodiverse roof seeding

% Mix	Latin Name
0.5	*Achillea millefolium*
6.5	*Anthyllis vulneraria*
12.5	*Centaurea nigra*
5	*Cruciata laevipes*
0.5	*Filipendula vulgaris*
5	*Galium album - (Galium mollugo)*
2.5	*Galium verum*
0.5	*Hippocrepis comosa*
5	*Leucanthemum vulgare*
1	*Lotus corniculatus*
15	*Malva moschata*
0.5	*Origanum vulgare*
5	*Plantago lanceolata*
5	*Plantago media*
10	*Poterium sanguisorba - (Sanguisorba minor)*
0.5	*Primula veris*
10	*Prunella vulgaris*
5	*Rhinanthus minor*
5	*Rumex acetosella*
5	*Silene vulgaris*

Key

- Order limits
- Trees/hedgerow to be removed
- Existing woodland/scrub to be retained within Order limits
- Existing scrub and trees outside Order limits to be retained
- Proposed native wet woodland
- Proposed native hedgerow with native trees
- Proposed native shrub
- Proposed species rich neutral grassland
- Proposed species rich wet grassland
- Proposed brown roof
- Permeable cellular confinement system on laydown area with neutral species rich grassland
- Proposed security fenceline
- Existing IDB ditches maintained by others
- Area omitted from biodiversity gain and reserved for potential rail embankment

Native Wet Woodland Species Mix - (Planted at 2m centres)

Species	Height	Specification	Mix
Alnus glutinosa	60-80cm	1+1: Transplant	20%
Betula pubescens	60-80cm	1+1: Transplant	15%
Cornus sanguinea	60-80cm	1+1: Transplant	15%
Crataegus monogyna	60-80cm	1+1: Transplant	15%
Prunus spinosa	60-80cm	Branched, 2 breaks	5%
Rhamnus frangula	60-80cm	1+1: Transplant	10%
Salix caprea	60-80cm	1+1: Transplant	5%
Salix cinerea	60-80cm	1+1: Transplant	5%
Viburnum opulus	60-80cm	1+1: Transplant	10%

Hedgerow trees

Species	Specification	Girth	Height
Acer campestre "Streetwise"	Heavy standard	12-14cm	350-400cm
Sorbus aucuparia 'Cardinal Royal'	Heavy standard	12-14cm	350-400cm
Prunus padus 'Albertii'	Heavy standard	12-14cm	350-400cm

Native Hedgerow Species Mix - (Double staggered row at 6 plants per m)

Species	Height	Specification	Mix
Cornus sanguinea	60-80cm	1+1: Transplant	5%
Corylus avellana	60-80cm	1+1: Transplant	10%
Crataegus monogyna	60-80cm	1+1: Transplant	30%
Euonymus europaeus	60-80cm	1+1: Transplant	10%
Ilex aquifolium	60-80cm	1+1: Transplant	10%
Ligustrum vulgare	60-80cm	1+1: Transplant	5%
Lonicera periclylmenum	60-80cm	1+1: Transplant	5%
Prunus spinosa	60-80cm	Branched, 2 breaks	10%
Rosa canina	60-80cm	1+1: Transplant	5%
Rhamnus frangula	60-80cm	1+1: Transplant	5%
Viburnum opulus	60-80cm	1+1: Transplant	5%

Native Shrub Mix - (Shrubs at 1m centres)

Species	Height	Mix
Corylus avellana	45-60cm	35%
Euonymus europaeus	45-60cm	10%
Ilex aquifolium	30-45cm	20%
Sambucus nigra	40-60cm	5%
Taxus baccatta	40-60cm	10%
Viburnum opulus	45-60cm	20%

Green Wall - climbing plants (3 No. single species group planted per panel)

Species	Height	Container	No.
Jasminum officinale	150-200cm	10L pot	3
Trachelospermum jasminoides	150-200cm	10L pot	3

0 m — 40 m
Scale 1:750 @ A1

Client

Medworth CHP Limited
Medworth Energy from Waste Combined Heat and Power Facility DCO
Environmental Statement
Chapter 3 - Description of the Proposed Development

Figure 3.14
Outline Landscape and Ecology Strategy

March 2023

wood.

H:\SAL-IS12-SHARED\Projects\41310 Wisbech\Deliver Stage\D Design_Technical\Data\Transport\Access schemes\MVV site plan\41310-WOOD-XX-XX-FG-L-0071_S0_P02.dwg Originator: ADAM.GUY