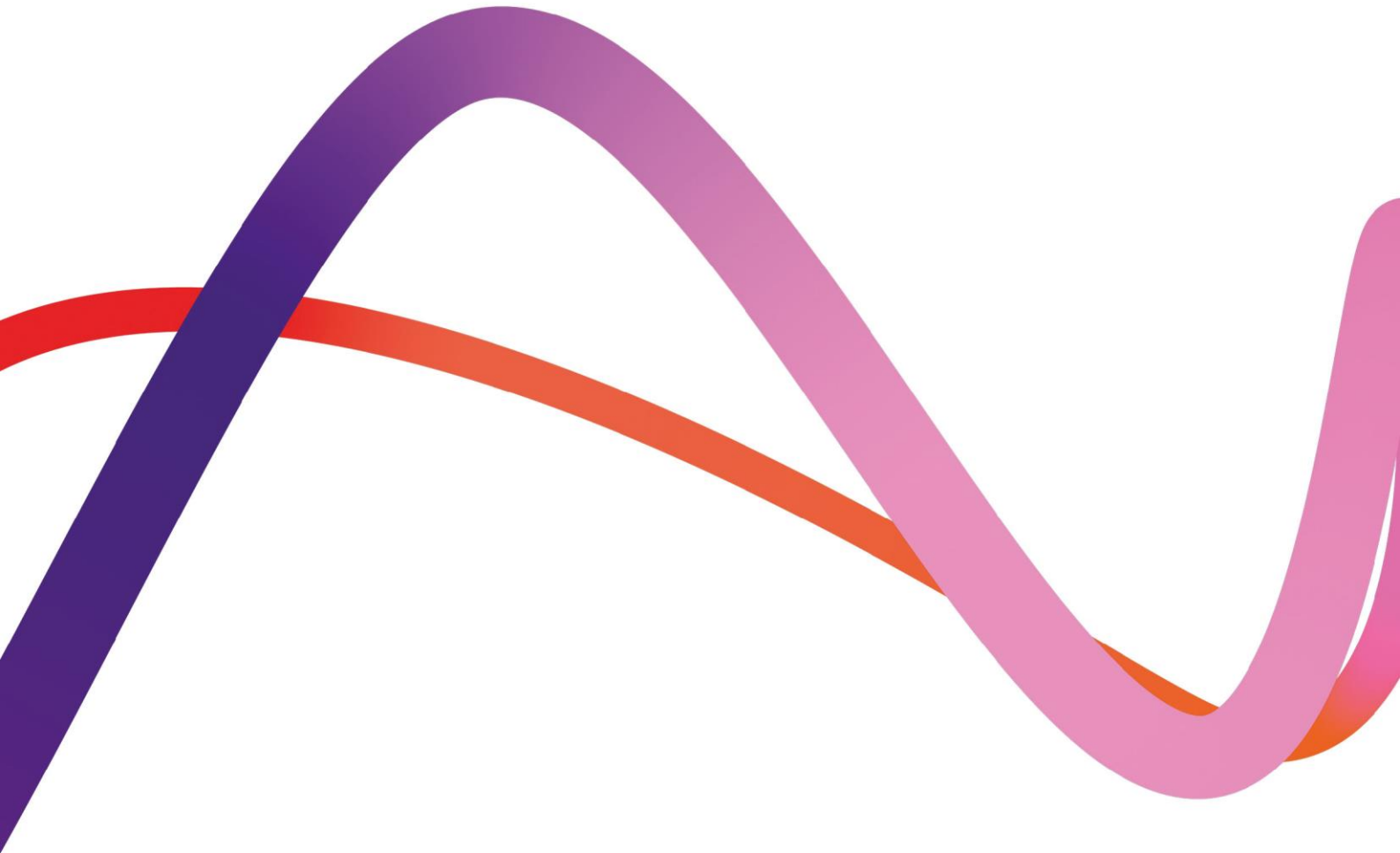


# Medworth Energy from Waste Combined Heat and Power Facility



PINS ref. EN010110  
Document Reference: Vol.10.8  
Revision: 1.0  
Deadline: 2  
March 2023



## **Applicant's response to the Host Authorities Summary of Relevant Representations**

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# 1. Introduction

## 1.1 Background

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

1.1.2 During the pre-examination phase of the Application process, persons were invited to register as an Interested Party and provide a relevant representation. The registration period ran from 4 October 2022 to 15 November 2022. The deadline was extended to 30 November 2022 for a single person with an interest in land, as their original notification of the relevant representation period was undelivered.

1.1.3 Relevant representations were received from the four Host Authorities:

- Borough Council of King's Lynn and West Norfolk (KLWN) [RR-001];
- Cambridgeshire County Council (CCC) [RR-002];
- Fenland District Council (FDC) [RR-003]; and
- Norfolk County Council (NCC) [RR-004].

1.1.4 The Applicant notes, CCC and FDC submitted a joint relevant representation.

1.1.5 At Deadline 1 (14 March 2023) the Applicant commented on the points raised within the relevant representations from the Host Authorities, see **Tables 2.1 to 2.3, Applicant's Comments on the Relevant Representations – Part 1 Local Authorities and 3(a) Statutory Parties (Volume 9.2 Part 1) [REP1-028]**.

1.1.6 At Deadline 1, if the Host Authorities relevant representation exceeded 1,500 words, the ExA required the submission of a summary document. The following Host Authorities submitted a summary document:

- CCC [REP1-069];
- FDC [REP1-075]; and
- NCC [REP1-087].

1.1.7 The Applicant notes, CCC and FDC submitted a joint relevant representation.

## 1.2 Purpose of this document

1.2.1 This documents summarises where in the Applicant's response to relevant representations the matters raised by the Host Authorities in their summaries of relevant representations are addressed. If relevant, other document references are provided.

## 3 Applicant's response to Host Authorities Summary of Relevant Representations

### 1.3 Structure of this document

1.3.1 This document is structured as follows:

- Section 2 – CCC and FDC's summary of relevant representations and the Applicant's response; and
- Section 3 – NCC's summary of relevant representations and the Applicant's response.



## 2. CCC and FDC's summary of relevant representations and the Applicant's response

**Table 2.1 Applicant's response to CCC and FDC Summary of Relevant Representations [REP1-069] and [REP1-075]**

ID	Submission	Applicant Response
<b>Introduction</b>		
1.1	On 15 November 2022, Cambridgeshire County Council (CCC) submitted their Relevant Representation to the Planning Inspectorate (PINS) jointly with Fenland District Council (FDC) in respect of the application for a Development Consent Order (DCO) submitted by Medworth CHP Limited for a Combined Heat and Power (Energy from Waste) Facility.	Comments noted.
<b>Background, Context and Key concerns</b>		
2.1	The technical comments sit in the context of the motions approved by elected Members of CCC and FDC to oppose this development, (CCC on 21 July 2020 and FDC on 20 February 2020), both motions included a letter being sent to the then Secretary of State to make clear the Councils' opposition to these plans.	Comments noted.
2.2	The key concerns highlighted align with the Environmental Statement (ES) chapter headings.	Comments noted.



ID	Submission	Applicant Response
<b>Traffic and Transport</b>		
3.1	For roads required for DCO works, highway boundary information should be sought from the Local Highway Authority (LHA) and should be marked on Access and Rights of Way sheets and clearly included in the legend. It is vital to define the assets for which the LHA is responsible and where it may need to make representations.	See Applicant's response at <b>Page 109 (Traffic and Transport) Table 2.2, Applicant's Comments on the Relevant Representations – Part 1 Local Authorities and 3(a) Statutory Parties (Volume 9.2 Part 1) [REP1-028]</b> .  At Deadline 1, the Applicant submitted an updated <b>Access and Rights of Way Plan Rev 3 (Volume 2.4) [REP1-005]</b> .
3.2	Access arrangements do not take into account the potential need to turn east from accesses towards the A47, when the aspirations of the South Wisbech Broad Concept Plans are realised and a link is formed to a new roundabout on the A47 (See <i>[redacted]</i> )	See Applicant's response at <b>Page 102 (Traffic and Transport) Table 2.2, Applicant's Comments on the Relevant Representations – Part 1 Local Authorities and 3(a) Statutory Parties (Volume 9.2 Part 1) [REP1-028]</b> .
3.3	Algores Way is not a public highway beyond Britannia Way but is owned by FDC. CCC has no statutory function in relation to these streets and any streets created by the DCO cannot legally be created as public highway.	See Applicant's response to <b>ISH1-AP6, Table 1.2 and Appendix C: Algores Way Letter 10 February 2023 and new sign erected by Fenland District Council, Draft Written Summary of the Applicant's Oral Submissions at ISH 1 (Volume 9.23) [REP1-057]</b> .
3.4	Provisions, Consents and approvals (S278 works and highway dedications) will need to be secured for any alterations to means of access are acceptable and the payment of reasonable fees, commitment to any commuted sums, commitment to undertake condition/ dilapidation surveys of highways, and any necessary mitigation requirements, such as a bridge to avoid prejudicing the reopening of Wisbech rail.	See Applicant's response at <b>Page 105 (Traffic and Transport) Table 2.2, Applicant's Comments on the Relevant Representations – Part 1 Local Authorities and 3(a) Statutory Parties (Volume 9.2 Part 1) [REP1-028]</b> .



ID	Submission	Applicant Response
3.5	Detailed discussions are required to understand the status of the statutory undertaker following the discharge of the DCO. Longitudinal non-passive private apparatus in the highway would be an unacceptable safety risk. If the Department for Transport (DfT) do not recognise the applicant as a statutory undertaker, the applicant will not be able to connect their EfW facility to the power grid.	See Applicant's response at <b>Page 106 (Traffic and Transport) Table 2.2, Applicant's Comments on the Relevant Representations – Part 1 Local Authorities and 3(a) Statutory Parties (Volume 9.2 Part 1) [REP1-028]</b> .
3.6	CCC request a requirement to consult with the LHA prior to any Temporary prohibition or restriction of use of streets and public rights of way which could impact the adjoining public highway network and to observe any reasonable requests made in respect of the timing of such closures.	See Applicant's response at <b>Page 108 (Traffic and Transport) Table 2.2, Applicant's Comments on the Relevant Representations – Part 1 Local Authorities and 3(a) Statutory Parties (Volume 9.2 Part 1) [REP1-028]</b> .
3.7	New accesses A3, A4 and A5 are to be maintained at public expense. This is unacceptable to CCC as these accesses are not connected to any publicly maintainable highways.	See response to 3.3 above.
3.8	The increase in slow moving right turning HGV vehicles at Cromwell Road / New Bridge Lane roundabout could cause capacity and safety issues at the junction. The applicant should be required to signalise the junction to reduce the risk of localised issues.	See Applicant's response at <b>Page 113 (Traffic and Transport) Table 2.2, Applicant's Comments on the Relevant Representations – Part 1 Local Authorities and 3(a) Statutory Parties (Volume 9.2 Part 1) [REP1-028]</b> .  Note – no roundabout is present at the Cromwell Road/New Bridge Lane junction.
3.9	Thomas Clarkson Academy (TCA) is situated approximately 750 metres from the site but there is no reference or acknowledgement of it in Chapter 6 of the ES. The increase in traffic will potentially impact the TCA and other schools in the area, particularly during peak times.	See Applicant's response at <b>Page 116 (Traffic and Transport) Table 2.2, Applicant's Comments on the Relevant Representations – Part 1 Local Authorities and 3(a) Statutory Parties (Volume 9.2 Part 1) [REP1-028]</b> .  At Deadline 1, the following relevant outline management plans were updated and submitted:



ID	Submission	Applicant Response
<b>Noise and Vibration</b>		<ul style="list-style-type: none"> <li>• Outline Operational Traffic Management Plan (Volume 7.15) [REP1-026]; and</li> <li>• Outline Construction Traffic Management Plan (Volume 6.4) [REP1-011].</li> </ul>
4.1	The Outline Construction Environmental Management Plan (CEMP) and the Outline Noise Management Plan (NMP) provide mitigation measures. Provision for securing these needs to be clarified and confirmed.	See Applicant's response at <b>Page 88 (Noise and Vibration) Table 2.2, Applicant's Comments on the Relevant Representations – Part 1 Local Authorities and 3(a) Statutory Parties (Volume 9.2 Part 1) [REP1-028].</b>
4.2	The TCA should be regarded as a sensitive receptor and further consideration and monitoring to mitigate any real-time impact should be provided. Longer term mitigation for other local school sites need to be given further consideration.	See Applicant's response at <b>Page 90 to 91 (Noise and Vibration) Table 2.2, Applicant's Comments on the Relevant Representations – Part 1 Local Authorities and 3(a) Statutory Parties (Volume 9.2 Part 1) [REP1-028].</b>
<b>Air Quality</b>		
5.1	CCC's Air Quality Consultant categorised errors and omissions in the application as Minor, Moderate or Major. Any one of the Major issues listed would be likely to invalidate the reported conclusions. Rigorous Quality Assurance and checking of all model inputs and results presented in the ES is required.	<p>See Applicant's response at <b>Page 30 to 37 (Air Quality) Table 2.2, Applicant's Comments on the Relevant Representations – Part 1 Local Authorities and 3(a) Statutory Parties (Volume 9.2 Part 1) [REP1-028].</b></p> <p>The <b>Rev 3</b> of the Air Quality Technical Report (<b>ES Appendix 8B Chapter 8 Air Quality Appendices</b>) (<b>Volume 6.4</b>) replaces Rev 2 and is submitted at Deadline 2.</p>





ID	Submission	Applicant Response
5.2	Further revisions of the Outline Construction Environmental Management Plan (Outline CEMP) should include the air quality impact assessment and be agreed prior to commencement of any use of plant and machinery on site.	See Applicant's response at <b>Page 38 (Air Quality) Table 2.2, Applicant's Comments on the Relevant Representations – Part 1 Local Authorities and 3(a) Statutory Parties (Volume 9.2 Part 1) [REP1-028]</b> .
5.3	The transportation of incinerator bottom ash (IBA) and air pollution control residues (APCr) should be enclosed or transported in such manner as to mitigate releases of particulates.	See Applicant's response at <b>Page 38 (Air Quality) Table 2.2, Applicant's Comments on the Relevant Representations – Part 1 Local Authorities and 3(a) Statutory Parties (Volume 9.2 Part 1) [REP1-028]</b> .
5.4	Dust mitigation measures should prevent the escape of airborne IBA from all storage and handling buildings. This should be included in the Air Quality Environmental Management Plan.	See Applicant's response at <b>Page 38 (Air Quality) Table 2.2, Applicant's Comments on the Relevant Representations – Part 1 Local Authorities and 3(a) Statutory Parties (Volume 9.2 Part 1) [REP1-028]</b> .
5.5	There is ambiguity in the Outline Odour Management Plan (OMP) on what the controls will be.	See Applicant's response at <b>Page 39 (Air Quality) Table 2.2, Applicant's Comments on the Relevant Representations – Part 1 Local Authorities and 3(a) Statutory Parties (Volume 9.2 Part 1) [REP1-028]</b> .
<b>Landscape and Visual</b>		
6.1	Serious concerns are raised regarding the applicant's assessment of the extent to which potential significant effects to landscape character and to the surrounding townscape character would extend as well as the visual effects of the vertical prominence of the chimneys and the mass of the buildings on residential properties within proximity of the site.	See Applicant's response at <b>Page 76 to 83 (Landscape and Visual) Table 2.2, Applicant's Comments on the Relevant Representations – Part 1 Local Authorities and 3(a) Statutory Parties (Volume 9.2 Part 1) [REP1-028]</b> .



ID	Submission	Applicant Response
6.2	The analysis of the significance of heritage assets is insufficient. The scale of the structures of the new facility will impact the setting of both designated and undesignated built heritage assets within the historic town and in the broader landscape.	See Applicant's response at <b>Page 66 (Historic Environment) Table 2.2, Applicant's Comments on the Relevant Representations – Part 1 Local Authorities and 3(a) Statutory Parties (Volume 9.2 Part 1) [REP1-028].</b>
<b>Historic Environment</b>		
7.1	The provision for a Written Scheme of Investigation (WSI) for monitoring and recording should be led by a brief prepared by CCC's Historic Environment Team to ensure that the county's archaeological priorities and requirements are met.	See Applicant's response at <b>Page 67 (Historic Environment) Table 2.2, Applicant's Comments on the Relevant Representations – Part 1 Local Authorities and 3(a) Statutory Parties (Volume 9.2 Part 1) [REP1-028].</b>
<b>Biodiversity</b>		
8.1	Officers are concerned about the following: <ul style="list-style-type: none"> <li>• Net loss in biodiversity value;</li> <li>• incomplete protected species surveys;</li> <li>• lack of compensation and enhancement for protected species;</li> <li>• more details required for assessment of habitats;</li> <li>• lack of priority habitat within the scheme appropriate for the location or to off-set losses; and</li> <li>• wording of DCO requirement(s).</li> </ul>	See Applicant's response at <b>Page 40 to 45 (Biodiversity) Table 2.2, Applicant's Comments on the Relevant Representations – Part 1 Local Authorities and 3(a) Statutory Parties (Volume 9.2 Part 1) [REP1-028].</b>
<b>Hydrology</b>		
9.1	The Local Lead Flood Authority (LLFA) expects that as much water is reused within the scheme as possible, in line with the drainage hierarchy. The LLFA commented on: Climate Change Allowance; Pumping of surface and	See Applicant's response at <b>Page 69 to 76 (Hydrology) Table 2.2, Applicant's Comments on the Relevant Representations – Part 1 Local Authorities and 3(a) Statutory Parties (Volume 9.2 Part 1) [REP1-028].</b>

## 10 Applicant's response to Host Authorities Summary of Relevant Representations



ID	Submission	Applicant Response
	groundwater; Half Drain Times; Hydraulic Calculations; Wider drainage proposals; and Maintenance.	
<b>Climate Change</b>		
10.1	Greenhouse Gas emissions from operation of the plant are very high.	See Applicant's response at <b>Page 45 (Climate Change) Table 2.2, Applicant's Comments on the Relevant Representations – Part 1 Local Authorities and 3(a) Statutory Parties (Volume 9.2 Part 1) [REP1-028]</b> .
10.2	The baseline scenario assumes that, without the development, all of the annual 625,000 tonnes of waste would go to landfill every year for the 40 years of operation. This seems very unlikely.	See Applicant's response at <b>Page 45 (Climate Change) Table 2.2, Applicant's Comments on the Relevant Representations – Part 1 Local Authorities and 3(a) Statutory Parties (Volume 9.2 Part 1) [REP1-028]</b> .
10.3	The scale of emissions is huge, with and without the proposal being built. The assumptions made regarding the composition of the waste can tip the balance as to whether or not the proposed development will lead to lower carbon emissions than without the development.	See Applicant's response at <b>Page 46 (Climate Change) Table 2.2, Applicant's Comments on the Relevant Representations – Part 1 Local Authorities and 3(a) Statutory Parties (Volume 9.2 Part 1) [REP1-028]</b> .
10.4	[not used]	n/a
10.5	Carbon Capture and Storage (CCS) is necessary in order for the proposal to be compatible with a Net Zero pathway.	See Applicant's response at <b>Page 47 (Climate Change) Table 2.2, Applicant's Comments on the Relevant Representations – Part 1 Local Authorities and 3(a) Statutory Parties (Volume 9.2 Part 1) [REP1-028]</b> .



ID	Submission	Applicant Response
10.6	No project on its own is large enough to have a 'beneficial Significant effect' when compared to UK carbon budgets.	See Applicant's response at <b>Page 47 (Climate Change) Table 2.2, Applicant's Comments on the Relevant Representations – Part 1 Local Authorities and 3(a) Statutory Parties (Volume 9.2 Part 1) [REP1-028].</b>
<b>Socio-Economics</b>		
11.1	No amount of S106 contributions, or commitments would outweigh the economic harm perceived to exist from these proposals.	See Applicant's response at <b>Page 98 to 99 (Socio-economic) Table 2.2, Applicant's Comments on the Relevant Representations – Part 1 Local Authorities and 3(a) Statutory Parties (Volume 9.2 Part 1) [REP1-028].</b>
11.2	The significant disruption to existing businesses on the industrial estate should not be underestimated.	See Applicant's response at <b>Page 99 (Socio-economic) Table 2.2, Applicant's Comments on the Relevant Representations – Part 1 Local Authorities and 3(a) Statutory Parties (Volume 9.2 Part 1) [REP1-028].</b>
11.3	It is crucial that if permission is granted, the re-opening of the Wisbech to March rail route should not be prejudiced.	See Applicant's response at <b>Page 100 (Socio-economic) Table 2.2, Applicant's Comments on the Relevant Representations – Part 1 Local Authorities and 3(a) Statutory Parties (Volume 9.2 Part 1) [REP1-028].</b>
<b>Health</b>		
	<p>The following consideration of effects on physical and mental health and wellbeing need improvement or have not been addressed:</p> <ul style="list-style-type: none"> <li>• Access to local public and key services.</li> <li>• Physical security.</li> </ul>	See Applicant's response at <b>Page 62 to 63 (Health) Table 2.2, Applicant's Comments on the Relevant Representations – Part 1 Local Authorities and 3(a) Statutory Parties (Volume 9.2 Part 1) [REP1-028].</b>



ID	Submission	Applicant Response
	<ul style="list-style-type: none"> <li>• The noise and impact of the connection to grid taking place and the proposed mitigation measures.</li> <li>• The potential for impacts on mental health from perceived pollution and emissions.</li> <li>• The impact of the proposed operational operating hours.</li> <li>• What mitigation measures are being proposed to address any adverse health impacts.</li> </ul>	
<b>Major Accidents and Disasters</b>		
13.1	<p>The site operator should engage with the Cambridgeshire and Peterborough Local Resilience Forum (CPLRF) to develop the Operational Flood Emergency Management Plan.</p>	<p>See Applicant's response at <b>Page 84 to 85 (Major Accidents and Disasters) Table 2.2, Applicant's Comments on the Relevant Representations – Part 1 Local Authorities and 3(a) Statutory Parties (Volume 9.2 Part 1) [REP1-028].</b></p>
13.2	<p>The impact of the development on local mains water supply should be assessed and any implications on firefighting flow rates. The impact of compulsory acquisitions which include access to mains water supplies and hydrant provision should be considered.</p>	<p>See Applicant's response at <b>Page 85 (Major Accidents and Disasters) Table 2.2, Applicant's Comments on the Relevant Representations – Part 1 Local Authorities and 3(a) Statutory Parties (Volume 9.2 Part 1) [REP1-028].</b></p>
<b>Waste Policy matters, including Waste Availability and Composition</b>		
14.1	<p>There are three areas of particular concern: the facility achieving R1 Status; compliance with Policies 3 and 4 of the Cambridgeshire and Peterborough Minerals and Waste Local Plan (2021) / Waste Availability; and Compatibility with surrounding land uses.</p>	<p>See the Applicant's response at <b>Page 119 to 129 (Waste Need) Table 2.2, Applicant's Comments on the Relevant Representations – Part 1 Local Authorities and 3(a) Statutory Parties (Volume 9.2 Part 1) [REP1-028].</b></p> <p>See the Applicant's updated <b>Waste Fuel Availability Assessment Rev 2 (Volume 7.3)</b>, submitted at Deadline 2.</p>



ID	Submission	Applicant Response
<b>Cumulative Impacts</b>		
15.1	The Fenland Education Campus (CCC/21/215/FUL) on Barton Road has been identified as one of the projects in the cumulative assessment but the site of the proposed Free School, which is significantly closer has not. The traffic and transport and air quality assessments do not accurately assess the potential impact on the TCA or the proposed Free School site.	See Applicant's response at <b>Page 51 (Cumulative Impacts) Table 2.2, Applicant's Comments on the Relevant Representations – Part 1 Local Authorities and 3(a) Statutory Parties (Volume 9.2 Part 1) [REP1-028]</b> .



### 3. NCC's summary of relevant representations and the Applicant's response

**Table 3.1 Applicant's response to NCC Summary of Relevant Representations [REP1-087]**

ID	Submission	Applicant Response
<b>Norfolk County Council – Summary of Relevant Representation</b>		
<b>NSR01</b>	<p>This statement sets out Norfolk County Council's (NCC's) Summary of its Relevant Representation (RR) on the Development Consent Order (DCO) application. The RR addresses only the matters in relation to which NCC has technical competence to scrutinize, and not the planning merits of the proposal. It is principally concerned only with the impacts of the Proposed Development in Norfolk, namely those associated with the grid connection linking the proposed Energy from Waste (EfW) Combined Heat and Power (CHP) facility, to the grid connection point at the Walsoken substation. The matters comprise the following, presented in the order of the Applicant's Environmental Statement (ES) chapters:</p>	Comments noted.
<p><b>Chapter 6 Traffic and Transport</b>            NCC Highway Authority (HA) has identified following issues relating to the construction phase and the operational phase of the development: Highways impact (on Norfolk roads); and Impact of the Grid Connection at Walsoken (including the Installation of Apparatus in the Public Highway etc).</p>		
<b>NSR02</b>	<p><u>Impact on the Local Highway Network</u>            Whilst the impact at the Elm High Road roundabout will be fully assessed by National Highways, given the volume of background traffic already using the A47 roundabout, NCC officers do not regard the impact as severe in the terms set out in paragraph 111 of the National Planning Policy Framework (NPPF).</p>	Comment noted.



ID	Submission	Applicant Response
<b>NSR03</b>	<p><u>Impact of the Grid Connection at Walsoken</u> The EfW would connect to the power grid at the Walsoken Substation, which is accessed from Broadend Road. The Applicant's intention is to route the connection cable underground along the A47 verge, under the Elm High Road/A47 junction and then for it to continue longitudinally underground along the highway verge of Broadend Road.</p> <p>The Applicant's is seeking to be classed as a Statutory undertaker as part of their DCO. However, if the DfT do not recognise the Applicant as a statutory undertaker and/or refuse to grant "state codes", the Applicant will not be able to connect their EfW facility to the power grid at the Walsoken Substation.</p>	<p>See Applicant's response at <b>Page 138 (Traffic), Table 2.3, Applicant's Comments on the Relevant Representations – Part 1 Local Authorities and 3(a) Statutory Parties (Volume 9.2 Part 1) [REP1-028]</b>.</p>
<b>Chapter 7 Noise and Vibration</b>		
<b>NSR04</b>	<p>NCC Highway Authority has identified potential amenity issues as including noise and vibration from traffic and the resulting impact on residents' quality of life. However, assessment of this issues falls outside the local Highway Authority's remit so that NCC defers to any RR submitted by the Borough Council of King's Lynn and West Norfolk (BCKLWN) on this matter.</p>	<p>Comments noted.</p>
<b>Chapter 8 Air Quality</b>		
<b>NSR05</b>	<p>In relation to Chapter 8 Air Quality, Norfolk County Council Highway Authority has identified potential amenity issues as including emissions from traffic and the resulting impact on residents' quality of life. However, assessment of this issues falls outside the local Highway Authority's remit so that NCC defers to any RR submitted by the BCKLWN on this matter.</p>	<p>Comments noted.</p>
<b>Chapter 9 Landscape and Visual</b>		
<b>NSR06</b>	<p>NCC's Principal Landscape Architect has raised concerns about the potential landscape and visual impact in Norfolk of the Proposed Development.</p>	<p>See Applicant's response at <b>Page 134 (Landscape and Visual), Table 2.3, Applicant's Comments on the Relevant</b></p>





ID	Submission	Applicant Response
<b>Representations – Part 1 Local Authorities and 3(a) Statutory Parties (Volume 9.2 Part 1) [REP1-028].</b>		
NSR07	The landscape impacts of the grid connection in Norfolk are likely to be minimal with any cable trenches occurring in highways verges and being short term impacts prior to being reinstated like for like. There may be opportunities for enhancement where seeding etc is going to occur, but this would be a matter for later discussions.	See Applicant's response at <b>Page 130 (Biodiversity), Table 2.3, Applicant's Comments on the Relevant Representations – Part 1 Local Authorities and 3(a) Statutory Parties (Volume 9.2 Part 1) [REP1-028].</b>
NSR08	In terms of the wider landscape and visual impacts the scale of the Proposed Development means that views from Norfolk are a concern. By nature of the proposal, it is difficult to entirely screen the stack/plume due to their scale and height.	See Applicant's response at <b>Page 134 (Landscape and Visual), Table 2.3, Applicant's Comments on the Relevant Representations – Part 1 Local Authorities and 3(a) Statutory Parties (Volume 9.2 Part 1) [REP1-028].</b>
NSR09	The PRoW network is quite limited in the area to the east of Wisbech, so the primary concern would be with the impact on residential receptors in villages/remote dwellings, road users of the A47 and the smaller road network, and the overall impact on the landscape character.	See Applicant's response at <b>Page 136 to 139 (Traffic), Table 2.3, Applicant's Comments on the Relevant Representations – Part 1 Local Authorities and 3(a) Statutory Parties (Volume 9.2 Part 1) [REP1-028].</b>
<b>Chapter 10 Historic Environment</b>		
NSR10	The Norfolk County Council Historic Environment Team advise that the archaeological impact of the grid connection at Walsoken and the cable route in Norfolk is minimal and that they have no other comments at this stage. The Examining Authority should however note that the BCKWN may wish to make a RR in relation to this matter.	Comments noted.
<b>Chapter 11 Biodiversity</b>		
NSR11	NCC's Principal Ecologist advises the direct impacts on ecology within Norfolk will be limited to the impacts of the grid connection along the A47 corridor. An	Comments noted, see Applicant's response at <b>Page 130 (Biodiversity), Table 2.3, Applicant's Comments on the</b>



ID	Submission	Applicant Response
	Outline Construction Environmental Management Plan (OCEMP) has been drafted which includes in Appendix D an Outline Ecological Mitigation Strategy which will need to be secured via the Requirements in the DCO. Broadly speaking, NCC considers that the embedded environmental measures set out in the OCEMP are acceptable.	<b>Relevant Representations – Part 1 Local Authorities and 3(a) Statutory Parties (Volume 9.2 Part 1) [REP1-028].</b>
NSR12	Responsibility for the Habitats Regulation Assessment (HRA)/Appropriate Assessment (AA) will lie with the Secretary of State as 'Competent Authority' rather than NCC.	Comments noted.
<b>Chapter 12 Hydrology</b>		
NSR13	It is proposed that the cable route crosses ordinary watercourses that are adopted by the King's Lynn internal Drainage Board (IDB) and therefore under the jurisdiction of the IDB rather than the Lead Local Flood Authority (LLFA). In addition, there are a number of other ordinary watercourses that are not adopted by the IDB that are under the jurisdiction of the LLFA. Should any temporary or permanent works be required in these ordinary watercourses, the LLFA will require the Applicant to obtain consent prior to undertaking works within these watercourses.	See Applicant's response at <b>Page 133 (Hydrology), Table 2.3, Applicant's Comments on the Relevant Representations – Part 1 Local Authorities and 3(a) Statutory Parties (Volume 9.2 Part 1) [REP1-028].</b>
NSR14	A review of the surface water flood risk along the route of the Order Limits, indicates that surface water flood risk is localised and of a limited extent, and that the proposed Walsoken Substation and the Grid Connection would be subject to a minimal increase in surface water runoff during construction and operation.	See Applicant's response at <b>Page 134 (Hydrology), Table 2.3, Applicant's Comments on the Relevant Representations – Part 1 Local Authorities and 3(a) Statutory Parties (Volume 9.2 Part 1) [REP1-028].</b>
<b>Chapter 13 Geology, Hydrogeology and Contaminated Land</b>		
NSR15	NCC does not raise any issues in relation to Chapter 12, but instead defers to any RR submitted by the BKLWN on this matter.	Comments noted.



ID	Submission	Applicant Response
<b>Chapter 14 Climate Change</b>		
NSR16	Given the scale of the development within Norfolk NCC does not raise any issues in relation to Chapter 14, but instead defers to any RR submitted by Cambridgeshire County Council (CCC) in respect of the proposed EfW plant itself.	Comments Noted.
<b>Chapter 15 Socio-Economics, Tourism, Recreation and Land Use</b>		
NSR17	NCC's Economic Development team has identified the employment and skills benefit of the Proposed Development as a relevant consideration, to be considered in the planning balance.	See Applicant's response at <b>Page 136 (Socio-economic), Table 2.3, Applicant's Comments on the Relevant Representations – Part 1 Local Authorities and 3(a) Statutory Parties (Volume 9.2 Part 1) [REP1-028]</b> .
NSR18	It advises that the Applicant has taken a proactive and positive approach to developing an outline Employment & Skills Strategy that reflects the needs and priorities of the local area. It advises that NCC will continue to work with the Applicant to finalise the strategy.	See Applicant's response at <b>Page 137 (Socio-economic), Table 2.3, Applicant's Comments on the Relevant Representations – Part 1 Local Authorities and 3(a) Statutory Parties (Volume 9.2 Part 1) [REP1-028]</b> .
<b>Chapter 16 Health</b>		
NSR19	NCC Public Health have commented on the impact of the project as it pertains to population health in Norfolk.	Comments noted.
NSR20	The UK Health Security Agency (UKHSA) is the national technical expert on possible impacts on health of energy from waste facilities. Public Health England guidance, subsequently adopted by UKHSA as one of its successor bodies, states that "modern, well run and regulated municipal waste incinerators are not a significant risk to public health".	Comments noted.



ID	Submission	Applicant Response
NSR21	The impact of the proposal on traffic in Norfolk during construction has been assessed as minor and any health impacts related to additional traffic will be negligible.	Comments noted.
NSR22	The Proposed Development could give rise to potential anxiety in local populations both among those living and working immediately adjacent to the application site and those further afield, due to community perceptions of risks to health.	See Applicant's response at <b>Page 133 (Health), Table 2.3, Applicant's Comments on the Relevant Representations – Part 1 Local Authorities and 3(a) Statutory Parties (Volume 9.2 Part 1) [REP1-028].</b>
<b>Chapter 17 Major Accidents and Disasters</b>		
NSR23	Norfolk Fire and Rescue Service (NFRS) has advised that it does not have any comment to make on hydrants for that part of the proposed EfW facility. A hydrant should however be installed at the proposed new gird connection in a location to approved by NFRS to ensure adequate fire-fighting water provision and should conform to BS750.	Applicant's response at <b>Page 134 to 135 (Major Accidents and Disasters), Table 2.3, Applicant's Comments on the Relevant Representations – Part 1 Local Authorities and 3(a) Statutory Parties (Volume 9.2 Part 1) [REP1-028].</b>
NSR24	In addition, NCC's Resilience Team has advised that CCC would be the emergency lead for any incident, but that NCC would expect to be informed and involved, given the potential cross-boundary issues in the event of an incident. It advises that particular importance should be attributed to the flood plans for the construction and post-completion phases of the Proposed Development and that it expects further co-ordination when emergency plans are being prepared.	Applicant's response at <b>Page 135 Table 2.3, Applicant's Comments on the Relevant Representations – Part 1 Local Authorities and 3(a) Statutory Parties (Volume 9.2 Part 1) [REP1-028].</b>
<b>Chapter 17 Cumulative Impacts</b>		
NSR25	NCC does not have any issues to raise in respect of the cumulative impact of the Proposed Development within Norfolk i.e. the cabling and gird connection at Walsoken.	Comments noted.



ID	Submission	Applicant Response
<b>Waste Policy matters, including Waste Availability, Composition and Capacity</b>		
<b>NSR26</b>	NCC does not wish to raise any issues in relation to this matter, but instead defers to any RR submitted by CCC, in whose area the EfW facility would be located.	Comments noted.
<b>Additional Representations</b>		
<b>NSR27</b>	It understood that the purpose of the RR is to facilitate the Examining Authority, to identify and carry out an initial assessment of the principal issues, rather than to engage in substantive consideration of the each of these issues.	Comments noted.

