

Medworth Energy from Waste Combined Heat and Power Facility

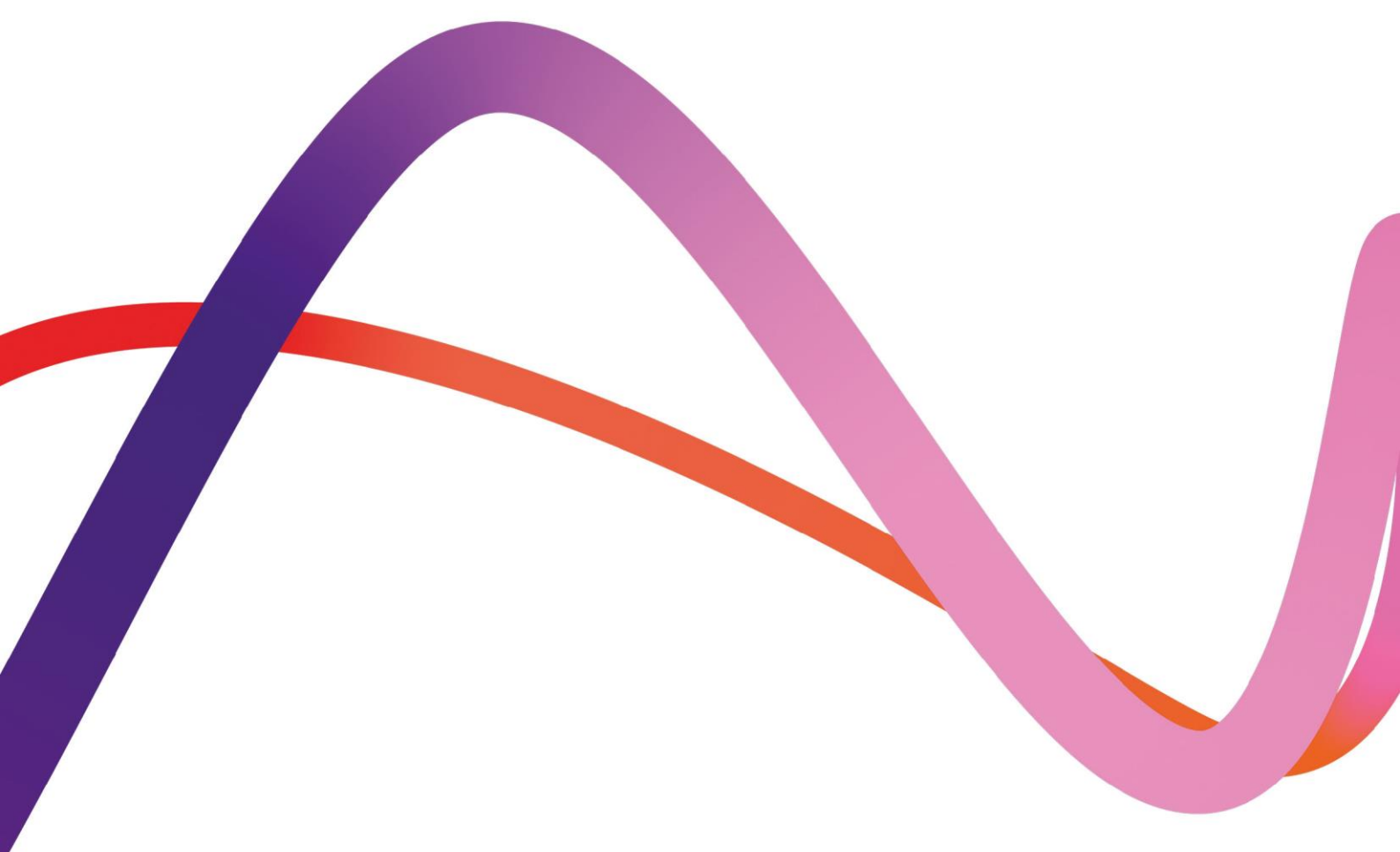
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National Policy Statement Tracker

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1. Introduction

1.1 Introduction

1.1.1 The **National Policy Statement Tracker** was originally prepared in response to a request from the Examining Authority (Rule 6 letter dated 24 January 2023) and submitted at Deadline 1 (Revision 1) (**Volume 9.18**) [REP1-052] on 10 March 2023.

1.1.2 The **National Policy Statement Tracker (Revision 2) (Volume 9.18)** has been updated and submitted at Deadline 3 (25 April 2023) following the publication of revised Draft National Policy Statements (NPS) (see section 2.2 of this document).

1.2 Purpose of the Document

1.2.1 The purpose of this document is to demonstrate that the Proposed Development complies with relevant national policy. As a nationally significant infrastructure relevant national policy is provided within NPS. Relevant NPSs are identified and a summary of policy guidance provided. The Applicant has identified how the Proposed Development complies with policy by reference to the application documentation which it has submitted.

1.3 Structure of the Document

1.3.1 The structure of the document is as follows:

- Section 1 – Introduction;
- Section 2 – National Policy Statement Tracker; and
- Section 3 – Conclusion.



2. National Policy Statement Tracker

2.1 Introduction

2.1.1 The Applicant has demonstrated compliance against the relevant NPS within Tables 2.1 to 2.3 below.

2.2 Relevant National Policy Statements

2.2.1 The National Policy Statements relevant to the Proposed Development are considered to be the following:

- NPS EN-1 The Overarching National Policy Statement for Energy.
- NPS EN-3 The National Policy Statement for Renewable Energy Infrastructure.
- NPS EN-5 The National Policy Statement for Electricity Networks Infrastructure.

2.2.2 In July 2021 the Secretary of State consulted upon a set of draft national policy statements. Relevant to the Proposed Development are:

- Draft NPS EN-1 The Overarching National Policy Statement for Energy.
- Draft NPS EN-3 The National Policy Statement for Renewable Energy Infrastructure.
- Draft NPS EN-5 The National Policy Statement for Electricity Networks Infrastructure.

2.2.3 In March 2023 the Secretary of State consulted upon a set of revised draft national policy statements. Relevant to the Proposed Development are:

- Revised Draft NPS EN-1 The Overarching National Policy Statement for Energy.
- Revised Draft NPS EN-3 The National Policy Statement for Renewable Energy Infrastructure.
- Revised Draft NPS EN-5 The National Policy Statement for Electricity Networks Infrastructure.

2.2.4 These draft statements supersede those issued in July 2021.

2.3 Compliance with the National Policy Statements

2.3.1 The Applicant has reviewed the Proposed Development against the relevant policies contained within the relevant National Policy and revised Draft National Policy Statements (March 2023) listed above within **Table 2.1 Compliance with National Policy Statement EN-1 and Draft EN-1** to **Table 2.3 Compliance with National Policy Statement EN-5 and Draft EN-5**. The approach it has taken is to summarise the policy guidance making reference to relevant policy numbers. Where the revised Draft NPS introduces proposed policy (including assessment principles and policy concerning the consideration of generic impacts) that is substantively different to that contained in the designated NPS, this is provided to the rear of each table.



Table 2.1 Compliance with National Policy Statement EN-1 and Revised Draft EN-1

NPS Para No.	Relevant Requirement of the National NPS	Scheme compliance with the National NPS	Examination document
NPS EN-1: 4.2.1 - Environmental Statement 4.2.11	<p>Applicants are required to submit an ES outlining the likely significant environmental, social and economic effects of proposed developments and how any likely significant negative effects would be avoided or mitigated.</p> <p>The ES should set out the environmental, social and economic impacts at all stages of development, including construction, commissioning, operation and decommissioning.</p>	<p>An ES has been submitted as part of the DCO Application for the Proposed Development. In accordance with NPS EN-1, the ES assesses the likely significant environmental, social and economic effects (including cumulative effects) associated with all stages of the Proposed Development and details the measures proposed to mitigate the negative effects of the scheme.</p>	<p>ES (Volume 6.2)</p> <p>ES Non-technical Summary (Volume 6.1) [APP-027]</p> <p>ES Figures (Volume 6.3)</p> <p>ES Appendices (Volume 6.4)</p>
NPS EN-1: 4.3.1	<p>Habitats and Species Regulations</p> <p>The SoS must consider whether the proposed development may have a significant effect on a European site or a site protected to the same extent by policy under the Conservation of Habitats and Species Regulations 2017, either</p>	<p>A Habitats Regulations Assessment (HRA) NSER (Volume 5.3) [AS-007] has been submitted as part of the DCO Application (Volume 5.3). The HRA identifies that there would be no significant effects upon European designated nature conservation sites as a result of the Proposed Development.</p>	<p>HRA NSER (Volume 5.3) [AS-007]</p>



NPS Para No.	Relevant Requirement of the National NPS	Scheme compliance with the National NPS	Examination document
	<p>alone or in combination with other plans or projects. The applicant is required to consult with Natural England and</p> <p>provide the SoS with any information reasonably required to determine whether an Appropriate Assessment is required. Where an Appropriate Assessment is required, the applicant must provide the SoS with such information as may reasonably be required to enable the SoS to conduct the Appropriate Assessment.</p>		
NPS EN-1: 4.4.1- 4.4.3	<p>Alternatives</p> <p>There are specific circumstances where alternatives must be considered; however, there is no general requirement to consider alternatives. These specific considerations relate to legislative requirements (including in respect of the EIA Regulations 2017 and Habitats Directive), flood risk and alternatives ways of meeting need.</p>	<p>The site selection process for the EfW CHP Facility Site is set out in Chapter 2: Alternatives (Volume 6.2) [APP-029] of the ES.</p> <p>The reasons for selecting the preferred options for the Proposed Development are also described Chapter 2: Alternatives (Vol. 6.2) [APP-029] of the ES including the alternatives considered relating to site configuration; location of the TCC; CHP Connection design; and the Grid Connection Corridor, including substation</p>	<p>ES Chapter 2: Alternatives (Volume 6.2) [APP-029]</p> <p>ES Appendix 2A (Volume 6.4) [APP-069]</p> <p>ES Chapter 12: Hydrology (Volume 6.2) [APP-039]</p>



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		<p>location and design (a separate Grid Connection Options Report has been submitted as Appendix 2A (Vol. 6.4) to Chapter 2: Alternatives (Vol 6.2) [APP-029] of the ES).</p> <p>At each stage of design evolution, the Applicant has taken account of the potential effects of the alternatives considered and selected a preference informed by predicted environmental performance together with technical and land use considerations. Account has also been taken of the relevant NPSs and local plan policies and proposals including waste management allocations and other relevant local strategies. The design evolution has also been informed by responses to non-statutory and statutory consultation.</p> <p>The HRA undertaken by the Applicant does not identify any significant effects upon protected sites such that the requirement to consider alternative locations for the Proposed Development is not triggered.</p> <p>On the matter of flood risk (the sequential test), both at the time the EfW CHP Facility</p>	<p>Appendix 12A FRA (Volume 6.4) [APP-084]</p> <p>HRA NSER (Volume 5.3) [AS-007].</p>



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		<p>Site was first identified and at the point the option agreement for the land comprising the majority of the EfW CHP Facility Site was signed in 2019, the EfW CHP Facility Site was allocated in the Cambridgeshire and Peterborough Waste and Minerals Development Plan Site Specific Allocations 2012 as a Waste Allocation and Consultation Area (W1C inset map 39) as site allocation W1C (an allocation for waste recycling and recovery facilities (non-landfill) under Policy SSP W1. In view of national policy as set out in EN-1, Revised 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</p>	



NPS Para No.	Relevant Requirement of the National NPS	Scheme compliance with the National NPS	Examination document
		<p>areas (Policy 10 WMAs). WMAs are existing or committed waste management sites.</p> <p>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.</p> <p>Following the adoption of the Cambridgeshire and Peterborough Minerals and Waste Local Plan 2021, and taking into account feedback received during statutory consultation, the Applicant re-evaluated its site selection process. As part of this re-evaluation, the Applicant undertook a sequential test which considered other WMAs in the Wisbech area (as set out in the Flood Risk Assessment (Appendix 12A FRA Volume 6.4 [APP-084])). The Applicant did not 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.</p>	



NPS Para No.	Relevant Requirement of the National NPS	Scheme compliance with the National NPS	Examination document
NPS EN-1: 4.5.1 - 4.5.6	<p data-bbox="535 284 1016 352">Criteria for “good design” for energy infrastructure</p> <p data-bbox="535 395 1016 576">Good design covers aesthetics, functionality, sensitive use of materials and sensitive siting of development in relation to surroundings.</p> <p data-bbox="535 619 1016 863">Applicants are required to justify their proposed design and demonstrate a sustainable structure and efficient use of resources. Applicants are also encouraged to seek independent advice.</p> <p data-bbox="535 906 1016 1129">Decisions will consider the extent to which the application fulfils the ultimate purpose of the infrastructure, taking account of relevant operational, safety and security requirements.</p>	<p data-bbox="1043 284 1637 831">A Design and Access Statement (Volume 7.5) [APP-096] has been provided as part of the DCO Application. This details how the design of the Proposed Development has evolved and demonstrates that all aspects of site selection, site access and future access requirements have been addressed and incorporated into the proposed design and that measures have been embedded to mitigate the adverse impacts of the Proposed Development. It explains the options considered in respect of (<i>inter alia</i>) massing, roof profiles and architectural design.</p> <p data-bbox="1043 874 1637 1310">The Design and Access Statement (Volume 7.5) [APP-096] confirms that the Applicant is committing to achieving a high sustainability standard by choosing to implement a Building Research Establishment Environmental Assessment Method (BREEAM) scoring system for the development. The EfW CHP Facility will be constructed to achieve a minimum BREEAM rating of ‘Good’, except for the administration building where the minimum rating will be ‘Excellent’.</p>	<p data-bbox="1671 284 2002 384">Design and Access Statement (Volume 7.5) [APP-096]</p> <p data-bbox="1671 427 2002 539">ES Chapter 2: Alternatives (Volume 6.2) [APP-029]</p>



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		<p>The Applicant's commitment to delivering the design commitments are secured by Draft DCO Requirement 2 (Volume 3.1) [REP1-007].</p> <p>As highlighted above, Chapter 2: Alternatives (Volume 6.2) [APP-029] of the ES also includes a description of the main alternatives considered by the Applicant and the reasons for selecting the preferred options for the Proposed Development.</p>	
NPS EN-1: 4.6.1 – 4.6.12	<p>Consideration of Combined Heat and Power</p> <p>Thermal generating station applications are required to include CHP or at least consider the use of CHP and applicants should consult with Stakeholders in this respect, including: potential heat customers, Homes England, Local Enterprise Partnerships and local authorities.</p>	<p>A CHP Connection has been incorporated into the design of the Proposed Development. This will allow the export of steam and electricity from the EfW CHP Facility to surrounding business users via dedicated pipelines and private wire cables. Any future connection spurs to end users would be the subject of a separate consent.</p> <p>The CHP Connection is described in Chapter 3: Description of the Proposed Development (Volume 6.2) [APP-030] of the ES and Section 2 of the Planning Statement (Volume 7.1) [APP-091]. The evolution of the CHP Connection design is described in Chapter 2: Alternatives</p>	<p>ES Chapter 2: Alternatives (Volume 6.2) [APP-029]</p> <p>ES Chapter 3: Description of the Proposed Development (Volume 6.2) [APP-030]</p> <p>Combined Heat and Power Assessment (Volume 7.6) [APP-097]</p>



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		<p>(Volume 6.2) [APP-029] of the ES. The environmental effects of the CHP Connection are assessed in the ES and have been taken into account in Sections 4.4 to 4.18 of the Planning Statement (Volume 7.1) [APP-091].</p> <p>A Combined Heat and Power Assessment (Volume 7.6) [APP-097] has been prepared to accompany the DCO Application. This document analyses potential demand for heat and power and demonstrates the financial viability of the Applicant's proposals.</p> <p>The Applicant's commitment to CHP is secured by Draft DCO Requirement 25 (Volume 3.1) [REP1-007].</p>	<p>Planning Statement (Volume 7.1) [APP-091]</p>
<p>NPS EN-1: 4.8.1 – Climate change adaptation 4.8.13</p>	<p>The SoS must consider the UK Climate Projections available at the time that the applicant's ES was prepared to ensure appropriate mitigation is proposed. The emissions scenario from the Climate Change Committee should be used at the minimum.</p>	<p>ES Chapter 14: Climate (Volume 6.2) [APP-041] includes an assessment of the projected impacts of climate change on the Proposed Development during construction, operation and decommissioning. This assessment of climate change resilience is based on UK Climate Projections 18 produced by the Met Office and draws on data from the Third Climate Change Risk Assessment published by the UK Government in</p>	<p>ES Chapter 12: Hydrology (Volume 6.2) [APP-039]</p> <p>ES Appendix 12A (Volume 6.4) [APP-084]</p> <p>ES Chapter 14: Climate (Volume 6.2) [APP-041]</p>



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	Adaptation measures should use the most up to date Climate Change Risk Assessment and consultation should be undertaken with the Environment Agency (EA).	<p>January 2022¹ and the latest evidence prepared by the Adaptation Committee presented in the Independent Assessment of UK Climate Risk 2021².</p> <p>The assessment takes account of the design measures built into the Proposed Development to ensure climate resilience. These measures include:</p> <ul style="list-style-type: none"> • design of Proposed Development to be resilient to current weather impacts; • implementation of a flexible construction programme to integrate extreme weather-related delays and allow flexibility of timings of critical activities; • a requirement for contractors to sign up for short to medium range weather forecasting alerts; • installation of lightning protection systems where required; • design of Proposed Development to give consideration to climate change adaptation in line with 	Planning Statement (Volume 7.1) [APP-091].

¹ UK Government. UK Climate Change Risk Assessment 2022.

² Betts, R.A. and Brown, K, (2021). Introduction. In: *The Third UK Climate Change Risk Assessment Technical Report* [Betts, R.A., Haward, A.B. and Pearson, K.V.(eds.)]. Prepared for the Climate Change Committee, London.



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		<p>relevant standards and future climate;</p> <ul style="list-style-type: none"> • measures to reduce the impact of extreme weather on construction; • design of the drainage systems to include consideration for resilience to climate change; • protection of the waste bunker against groundwater ingress and uplift; • use of climate suitable species in landscape planting; and • reduction in the reliance on potable water to be implemented e.g., rainwater harvesting. 	
		<p>On the basis of the measures embedded into the design of the Proposed Development, the climate change resilience assessment concludes that there would be no significant effects.</p>	
		<p>The effects of climate change are additionally considered (as appropriate) in other ES environmental topic chapters. This includes the assessment of hydrological impacts in ES Chapter 12: Hydrology (Volume 6.2) [APP-039] which has been informed by an FRA (Appendix 12A: FRA (Volume 6.4) [APP-084]). The</p>	



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		<p>findings of the hydrological assessment including FRA are summarised in Section 4.9 of the Planning Statement (Volume 7.1) [APP-091].</p> <p>The Applicant's commitments to suitably manage climate change impacts associated with flood risk and surface water drainage are secured by Draft DCO Requirement 8 (Volume 3.1) [REP1-007].</p>	
NPS EN-1: 4.9.1 – 4.9.4	<p>Grid Connection</p> <p>The SoS will need to be satisfied that there is no reason why a grid connection cannot be secured from National Grid, although the connection does not have to be secured at the time that the application is submitted.</p>	<p>ES Chapter 2: Alternatives (Volume 6.2) [APP-029] explains how the design of the Grid Connection has evolved as a result of environmental, technical and land use considerations and as a result of consultation feedback including from National Grid. A separate Grid Connection Options Report has been submitted as Appendix 2A (Volume 6.4) [APP-069] to Chapter 2: Alternatives of the ES.</p> <p>Chapter 3: Description of the Proposed Development (Volume 6.2) [APP-030] of the ES describes the connection and this is summarised in Section 2 of the Planning Statement (Volume 7.1) [APP-091].</p>	<p>ES Chapter 2: (Volume 6.2) [APP-029]</p> <p>ES Appendix 2A (Volume 6.4) [APP-69]</p> <p>ES Chapter 3: (Volume 6.2) [APP-030]</p> <p>Grid Connection Statement (Volume 7.2) [APP-093]</p> <p>Planning Statement (Volume 7.1) [APP-091].</p>



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		<p>The environmental effects of the Grid Connection are assessed in the ES and have been taken into account in Sections 4.4 to 4.18 of the Planning Statement (Volume 7.1) [APP-091].</p> <p>A Grid Connection Statement (Volume 7.2) [APP-093] has been submitted with the DCO Application. This demonstrates that there is the necessary infrastructure and capacity within the distribution network to accommodate the electricity generated by the Proposed Development and confirms that the Applicant has accepted a grid connection offer from UKPN.</p>	
<p>NPS EN-1: 4.10.1 – 4.10.8</p>	<p>Pollution control and other environmental regulatory regimes</p> <p>The SoS will consider if the proposed development constitutes an acceptable use of land.</p> <p>The applicant is required to demonstrate that all Environmental Permitting requirements can be met as necessary. Applicants must prove</p>	<p>The Applicant recognises that some issues may be subject to separate regulatory regimes including environmental permitting. The Other Consents and Licences (Volume 5.4) [APP-026] document submitted with the DCO Application identifies the other consents and licences required and provides details of when they will be applied for.</p> <p>The Applicant applied to the Environment Agency for an Environmental Permit for the EfW CHP Facility on the 5 August 2022. The application reference is</p>	<p>Other Consents and Licences (Volume 5.4) [APP-026]</p>



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	<p>that the relevant pollution control authority will be satisfied that adequate pollution controls will be provided and that the proposed development will not make existing pollution levels unacceptable on-site.</p>	<p>EPR/HP3441QA/A001. On 14 April 2023 the Applicant received a letter from the Environment Agency stating that it considers the application to be of 'high public interest' and setting out the implications of this, including the need for extra consultation by the Agency and that the time taken to reach a decision is likely to be longer.</p> <p>On 13 April 2023 the Environment Agency confirmed the Applicant's Environmental Permit Application was duly made and a letter to confirm will be issued imminently.</p> <p>The Applicant will continue to engage with the Environment Agency and to update the ExA on the progress of the application during the course of the DCO examination.</p>	
<p>NPS EN-1: 4.11.1- Safety 4.11.4</p>	<p>The Health and Safety Executive ('HSE') should be consulted on all safety related matters.</p> <p>Energy infrastructure projects may be required to meet the Control of Major Accident Hazards (COMAH) Regulations 2015 and in such instances, the applicant</p>	<p>HSE were consulted on the Proposed Development during Statutory Consultation and has confirmed that it would not advise against the DCO Application. Further detail is provided in the Consultation Report (Volume 5.1) [APP-018] and Chapter 17: Major Accidents and Disasters (Volume 6.2) [APP-044] of the ES.</p>	<p>Consultation Report (Volume 5.1) [APP-018]</p> <p>ES Chapter 17: (Volume 6.2) [APP-044]</p>



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	<p>should consult with the competent authority.</p>	<p>Chapter 17: Major Accidents and Disasters (Volume 6.2) [APP-044] of the ES confirms that the Proposed Development does not fall under the Control of Major Accident Hazards (COMAH) Regulations 2015 and, further, that it will not require Hazardous Substances Consent due to the low inventories of any hazardous substances which may be stored or used at the EfW CHP Facility.</p> <p>HSE has additionally confirmed that the EfW CHP Facility Site is outside the consultation distances for any sites with Hazardous Substances Consent or Major Accident Hazard Pipelines. This means that it is extremely unlikely that an accident on one of these sites could lead to a major accident at the EfW CHP Facility.</p> <p>The Grid Connection crosses or is in close proximity to, several gas pipelines. However, the major accidents and disasters assessment presented in Chapter 17: Major Accidents and Disasters (Volume 6.2) [APP-044] of the ES has confirmed that any impacts during construction or operation will be suitably</p>	



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NPS EN-1: 4.12.1 – Hazardous Substances 4.12.3	Hazardous Substances Consent should be sought by all applications proposing to hold hazardous substances above the relevant thresholds. This could be included in the application for a DCO.	managed in conjunction with the pipeline operator to ensure they are not significant.	ES Chapter 17: (Volume 6.2) [APP-044]
NPS EN-1: 4.13.1 – Health 4.13.5	The ES should assess and identify any impacts on human health and propose mitigation measures as necessary. Elements of energy infrastructure which may negatively affect human health are unlikely to be a reason for refusal under the 2008 Act since they are generally subject to separate regulations.	Chapter 16: Health (Volume 6.2) [APP-043] of the ES provides an assessment of the health impacts of the Proposed Development, focusing on effects on the population, including vulnerable groups, rather than individuals. The health impacts considered include (<i>inter alia</i>): <ul style="list-style-type: none"> • economic impacts (including jobs creation) during construction and operation of the Proposed Development; • impacts on healthcare facilities during construction of the Proposed Development; • severance during construction and operation of the Proposed Development; 	ES Chapter 16: Health (Volume 6.2) [APP-043] Planning Statement (Volume 7.1) [APP-091].



NPS Para No.	Relevant Requirement of the National NPS	Scheme compliance with the National NPS	Examination document
		<ul style="list-style-type: none"> • perceptions of risk affecting health and wellbeing; • noise and vibration effects arising from the construction and operation of the Proposed Development; • emissions to air arising from the construction and operation of the Proposed Development; and • EMFs. <p>The assessment has been informed by the other environmental topic chapters of the ES, as appropriate. It has taken into account measures embedded into the design of the Proposed Development to mitigate health impacts including (<i>inter alia</i>):</p> <ul style="list-style-type: none"> • implementation of the Outline CEMP (Volume 7.12) [REP1-024] submitted with the DCO Application; • optimisation of chimney heights to ensure adequate dispersion of emissions from the EfW CHP Facility; • implementation of selective non-catalytic reduction (SNCR) within the furnace to reduce emissions to air; • transport, handling and processing of waste in enclosed buildings and 	



NPS Para No.	Relevant Requirement of the National NPS	Scheme compliance with the National NPS	Examination document
		<p>covered vehicles and implementation of the Outline Odour Management Plan (Volume 7.11) [REP1-021] to avoid odour effects;</p> <ul style="list-style-type: none"> • implementation of the Outline Employment and Skills Strategy (Volume 7.8) [APP-099] submitted with the DCO Application to maximise the use of, and upskill, the local workforce; and • provision of an acoustic fence to 10 New Bridge Lane. <p>The assessment identifies the potential for moderate and probably significant beneficial effects on the local economically active population arising from the creation of temporary direct and indirect employment opportunities during construction of the Proposed Development.</p> <p>Significant adverse effects are identified in respect of severance during construction and operation associated with increased HGV movements, although proposals for a new pedestrian crossing (see Section 4.15) reduce the residual effect to not significant.</p>	



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	<p>The assessment identifies the potential for major and significant negative health effects on residential and non-residential Receptors due to noise impacts during construction; however, with mitigation (see Section 4.13) the residual effect is reduced to not significant. Noise arising from the operation of the proposed EfW CHP Facility is also assessed as having a significant negative health effect at the nearest dwellings at 9 and 10 New Bridge Lane. However, the assessment confirms that with the implementation of additional mitigation measures (see Section 4.13), impacts will again be reduced such that the resultant effects are not significant. Further, the assessment concludes that, given the number of dwellings involved, operational noise will not impact on health within the wider population, including vulnerable groups.</p> <p>No further significant health effects have been identified in the health assessment presented at Chapter 16: Health (Volume 6.2) [APP-043] of the ES.</p> <p>The findings of Chapter 16: Health (Volume 6.2) [APP-043] of the ES have informed Sections 4.4 to 4.18 of the</p>		



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		Planning Statement (Volume 7.1) [APP-091] , as appropriate.	
NPS EN-1: 4.14.1 - 4.14.3	<p>Common law nuisance and statutory nuisance</p> <p>Applicants must demonstrate that they have considered potential sources of nuisance under Section 79(1) of the Environmental Protection Act 1990 and must propose appropriate mitigation at the submission stage to demonstrate that appropriate requirements can be included in a DCO.</p>	<p>A Statement of Statutory Nuisance (Volume 5.2) [APP-024] has been prepared which considers possible sources of nuisance arising from the Proposed Development and how they may be mitigated or limited under the provisions of section 79(1) of the Environmental Protection Act 1990.</p> <p>Possible sources of nuisance considered in the Statement of Statutory Nuisance (Volume 5.2) [APP-024] include emissions to air, noise and artificial lighting associated with the construction and operation of the Proposed Development. It concludes that embedded mitigation measures will prevent impacts which are considered to have the potential to result in statutory nuisance under section 79(1) of the Environmental Protection Act 1990. Further, operation of the Proposed Development in terms of emissions to air will be regulated by the EA through the environmental permitting regime.</p> <p>The ES includes an assessment of the effects of the Proposed Development on</p>	<p>Statement of Statutory Nuisance (Volume 5.2) [APP-024]</p> <p>ES Chapter 7: (Volume 6.2) [APP-034]</p> <p>ES Chapter 8: (Volume 6.2) [APP-035]</p> <p>ES Chapter 9: (Volume 6.2) [APP-036]</p> <p>ES Chapter 16: (Volume 6.2) [APP-043]</p> <p>Planning Statement (Volume 7.1) [APP-091].</p>



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		<p>air quality (Chapter 8: Air Quality), noise (Chapter 7: Noise and Vibration) and visual amenity (Chapter 9: Landscape and Visual) (all Volume 6.2). Chapter 16: Health (Volume 6.2) [APP-043] of the ES, meanwhile, presents an assessment of the effects of the Proposed Development on human health. The findings of the ES have informed Sections 4.4 to 4.18 of the Planning Statement (Volume 7.1) [APP-091].</p>	
<p>NPS EN-1: 4.15.1 – Security Considerations 4.15.5</p>	<p>National security considerations may be required where a proposed development involves potentially critical infrastructure. The Centre for the Protection of National Infrastructure and the Office for Civil Nuclear Safety are responsible for confirming to the SoS that security issues have been adequately assessed.</p>	<p>The Proposed Development includes a range of security measures. These measures are detailed in Chapter 3: Description of the Proposed Development (Volume 6.2) [APP-030] of the ES, the Design and Access Statement (Volume 7.5) [APP-096] and the Outline CEMP (Volume 7.12) [REP1-024] and include (<i>inter alia</i>):</p> <ul style="list-style-type: none"> • security fencing along the boundary of the EfW CHP Facility Site and the TCC; • installation of security lighting and CCTV at the EfW CHP Facility Site; • installation of remote cameras at the TCC during construction; 	<p>ES Chapter 3: (Volume 6.2) [APP-030]</p> <p>Design and Access Statement (Volume 7.5) [APP-096]</p> <p>Outline CEMP (Volume 7.12) [REP1-024]</p>



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NPS EN-1: 5.2.1 - Air Quality and Emissions 5.2.13	<p><u>Applicant's Assessment</u> The ES should include an assessment of effects on air quality where the proposed development is likely to have an adverse effect on air quality.</p> <p><u>Decision Making</u> Air quality considerations will generally be given substantial weight by the SoS in decision making where a proposed development would lead to a deterioration in air quality or cause national air quality limits to be breached in a particular area.</p>	<ul style="list-style-type: none"> • operation of s shift team outside of operational hours at the EfW CHP Facility; • control of access and egress from the EfW CHP Facility Site and TCC during construction and operation; • attendance of security personnel on-site during the construction phase; and • development of Safety and Security Plans for the construction site. <p>The Applicant has undertaken an assessment of the effects arising from the construction and operation of the Proposed Development upon air quality. The results are presented within ES Chapter 8: Air Quality (Volume 6.2) [AP-035]. The assessment concludes that effects would not lead to significant effects upon sensitive Receptors which are defined as industrial and residential Receptors and biodiversity sites (Table 8.35 Summary of significant effects). Table 8.36 Summary of environmental measures to be implemented relating to air quality sets out the environmental measures identified to mitigate effects together with the responsibility for implementation and proposed compliance mechanism.</p>	ES Chapter 8: Air Quality (Volume 6.2) [APP-035]



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NPS EN-1: 5.3.1 – 5.3.20	<p>Where necessary, mitigation measures will need to be considered for construction and operational emissions.</p> <p>Biodiversity and geological conservation</p> <p><u>Applicant's Assessment</u> The ES should clearly describe impacts on:</p> <ul style="list-style-type: none"> internationally, nationally and locally designated sites of ecological or geological conservation importance; protected species; and habitats and other species identified as being of principal importance for the conservation of biodiversity. <p>The ES should demonstrate how opportunities to conserve and enhance biodiversity and geological conservation interests have been optimised.</p>	<p>The Applicant has undertaken an assessment of the effects arising from the construction and operation of the Proposed Development upon internationally, nationally and locally designated sites of ecological importance. No sites identified for geological importance have been identified within the relevant study area (see ES Chapter 13: Geology, Hydrogeology and Contaminated Land, (Volume 6.2) [APP-040]. Paragraph 13.5.11 which states that '<i>There are no Regionally Important Geological and Geomorphological Sites (RIGS) or Locally Important Geological Sites (LIGS) located within the EfW CHP Facility Site, Access Improvements, CHP Connection, TCC and Water Connections</i>'.</p> <p>The results of the ecological assessment are presented within ES Chapter 11: Biodiversity (Volume 6.2) [AS-008]. The assessment concludes in Table 11.15 Summary of significant effects that effects upon the Nene Washes Ramsar, SPA and</p>	<p>ES Chapter 13: Geology, Hydrogeology and Contaminated Land, (Volume 6.2) [APP-040]</p> <p>ES Chapter 11: Biodiversity (Volume 6.2) [AS-008]</p> <p>ES Chapter 11: Biodiversity Appendix 11M Biodiversity Net Gain Rev2 (Volume 6.2) to be submitted at Deadline 3.</p>



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	<p>Appropriate mitigation measures should be included within the proposed development to demonstrate that:</p> <ul style="list-style-type: none"> • construction activities will be confined to the minimum areas required for the works; • best practice will be applied to minimise the risk of disturbance or damage to species or habitats during construction; • habitats will be restored after construction where practicable; and • existing habitats will be enhanced and new habitats created within landscaping proposals where opportunities exist. <p><u>Decision Making</u> The SoS must ensure that appropriate weight is attached to: designated sites of international, national and local importance; protected species; habitats and other species of principal importance for the conservation of</p>	<p>SAC and the Ouse Washes Ramsar, SPA and SAC internationally designated sites would not lead to significant effects. There are no statutory nature conservation sites of national/local importance within the 5km Study Area. The River Nene is a non-statutory County Wildlife Site. Effects upon it would not be significant.</p> <p>Table 11.13 Summary of the embedded environmental measures describes the proposed mitigations and how these influence the biodiversity assessment. The table summarises the measures taken to optimise the layout of the Proposed Development to avoid important habitats where possible and the best practice to be secured to minimise disturbance. The Applicant has designed a landscaping strategy which seeks to maximise biodiversity and it has also committed to achieving Biodiversity Net Gain (ref ES Chapter 11 Biodiversity Appendix 11M Biodiversity Net Gain Rev2 (Volume 6.2) to be submitted at Deadline 3.</p> <p>The Applicant's commitment to deliver biodiversity, landscape and ecological mitigation are secured by Draft DCO</p>	



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	biodiversity; and to biodiversity and geological interests within the wider environment.	Requirements 4, 5 and 6 (Volume 3.1) [REP1-007].	
NPS EN-1: 5.4.1 – 5.4.21	<p>Civil and military aviation and defence interests</p> <p><u>Applicant's Assessment</u> Where the proposed development is likely to have an impact on civil/military aviation or other defence assets, an assessment of potential effects should be set out in the ES. In preparing this assessment, the applicant should consult the Ministry of Defence (MoD), Civil Aviation Authority (CAA), NATS and any aerodrome likely to be affected. The assessment should consider the potential impacts upon the operation of communications, navigation and surveillance (CNS) infrastructure, flight (civil and military) patterns and other defence assets and aerodrome operational procedures. The assessment should also consider cumulative effects with other relevant projects.</p>	<p>The Applicant consulted with the Ministry of Defence (MoD), Civil Aviation Authority (CAA), NATS and relevant aerodromes.</p> <p>The MOD responded at Scoping and was reconsulted via email on 5 May 2021 when it confirmed its agreement to a DCO requirement for a static infra-red light to be placed on both chimneys and for the Applicant to provide the MOD with specific details regarding the Proposed Development (see Table 3A.2 Summary of additional engagement regarding the description of the Proposed Development)</p> <p>ES Chapter 3: Description of the Proposed Development Appendix 3A Consultation and stakeholder engagement (Volume 6.4) [APP-070].</p> <p>NATS responded to the Applicant's scoping request to state that the Proposed Development does not conflict with its safeguarding criteria and that it had no objection to the proposal. This was confirmed within its S42 response to statutory consultation via an email dated 06 July 2021.</p>	<p>ES Chapter 3: Description of the Proposed Development Appendix 3A Consultation and stakeholder engagement (Volume 6.4) [APP-070]</p>



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	<p><u>Decision Making</u> The SoS should be satisfied that the effects on civil and military aerodromes, aviation technical sites and other defence assets have been addressed and that any necessary assessment of the proposal on aviation or defence interests has been carried out.</p> <p>Development consent should not be granted where the development would:</p> <ul style="list-style-type: none"> • prevent an aerodrome from maintaining its licence; • result in harm to aerodromes which outweigh the benefits; • significantly impede or compromise the safe and effective use of defence assets or limit military training; or <p>impact on the safe and efficient provision of en-route air traffic control services for civil aviation.</p>	<p>The CAA was consulted at ES Scoping and at non-statutory and statutory consultation. No responses were received.</p>	



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NPS EN-1: 5.6.1 – 5.6.11	<p data-bbox="535 285 1016 389">Dust, odour, artificial light, smoke, steam and insect Infestation</p> <p data-bbox="535 435 875 462"><u>Applicant's Assessment</u></p> <p data-bbox="535 472 1016 724">The ES should include an assessment of the potential for insect infestation and the potential impacts of emissions of odour, dust, steam, smoke and artificial light arising from the proposed development.</p> <p data-bbox="535 767 1016 906">Where necessary, mitigation measures should be included as part of any proposed development including:</p> <ul data-bbox="584 916 1016 1398" style="list-style-type: none"> <li data-bbox="584 916 1016 1129">• engineering – prevention of a specific emission at the point of generation; control, containment and abatement of emissions if generated; <li data-bbox="584 1139 1016 1321">• lay-out – adequate distance between source and sensitive receptors and reduced transport or handling of material; and <li data-bbox="584 1331 1016 1398">• administrative – limiting operating times, restricting 	<p data-bbox="1043 285 1644 504">The Applicant has considered the potential for insect infestation. ES Chapter 3: Description of the Proposed Development (Volume 6.2) [APP-030] paragraph 3.5.47 sets out the measures to monitor and control pests.</p> <p data-bbox="1043 547 1644 831">The design measures to address emissions of odour are set out within the same chapter at paragraph 3.4.6 whilst the Applicant has also prepared an Outline Odour Management Plan (Volume 7.11) [REP1-021], secured by Draft DCO Requirement 16 (Volume 3.1) [REP1-007].</p> <p data-bbox="1043 841 1644 1093">Dust, steam and smoke is addressed within ES Chapter 8: Air Quality (Volume 6.2) [APP-035] which sets out mitigation measures at Table 8.17 Summary of embedded environmental measures and how these influence the air quality assessment.</p> <p data-bbox="1043 1136 1644 1353">Artificial light would be controlled via ES Chapter 3: Description of the Proposed Development Appendix 3B Outline Lighting Strategy (Volume 6.4) [APP-071] secured by Draft DCO Requirement 18 (Volume 3.1) [REP1-007].</p>	<p data-bbox="1671 285 1998 504">ES Chapter 3: Description of the Proposed Development (Volume 6.2) [APP-030]</p> <p data-bbox="1671 547 1998 686">Outline Odour Management Plan (Volume 7.11) [REP1-021]</p> <p data-bbox="1671 729 1998 831">ES Chapter 8: Air Quality (Volume 6.2) [APP-035]</p> <p data-bbox="1671 874 1998 1168">ES Chapter 3: Description of the Proposed Development Appendix 3B Outline Lighting Strategy (Volume 6.4) [APP-071]</p> <p data-bbox="1671 1243 1998 1353">Outline Construction Environmental Management Plan</p>



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	<p>activities allowed on the site, implementing management plans.</p> <p><u>Decision Making</u></p> <p>The SoS should be satisfied that an assessment of the potential for artificial light, dust, odour, smoke, steam and insect infestation to have a detrimental impact on amenity has been carried out and that all reasonable steps have been taken, and will be taken, to minimise any such detrimental impacts.</p>	<p>Additional measures to control emissions created during construction are set out within the Outline Construction Environmental Management Plan (Volume 7.12) [REP1-024], secured by Draft DCO Requirement 10 (Volume 3.1) [REP1-007].</p>	<p>(Volume 7.12) [REP1-024]</p>
<p>NPS EN-1: 5.7.1 – Flood Risk 5.7.25</p>	<p><u>Applicant's Assessment</u></p> <p>A Flood Risk Assessment (FRA), setting out and assessing the risks from all forms of flooding to and from the proposed development, and outlining any necessary mitigation or management measures, will be required.</p> <p>Applicants should undertake pre-application consultation with the EA and other relevant bodies where projects are likely to be affected by, or add to, flood risk.</p>	<p>The Applicant has prepared an FRA which is submitted as ES Chapter 12: Hydrology Appendix 12A FRA (Volume 6.4) [APP-084]. This document includes for appropriate mitigation and management and was prepared in consultation with the EA and relevant bodies which include the lead flood officers and internal drainage boards as summarised with paragraph 1.4.2.</p> <p>The FRA sets out the sequential and exception tests which were applied and satisfied in accordance with relevant national policy and guidance.</p>	<p>Outline Construction Environmental Management Plan (Volume 7.12) [REP1-024]</p>



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	<p><u>Decision Making</u> The SoS should not grant development consent in Flood Zone 2 unless they are satisfied that the sequential test has been met for the proposed development. The SoS should not consent development in Flood Zone 3 unless they are satisfied that the Sequential and Exception Test requirements have been met.</p>	<p>The Applicant's commitment to suitably manage flood risk and surface water drainage matters is secured by Draft DCO Requirement 8 (Volume 3.1) [REP1-007].</p>	
<p>NPS EN-1: 5.8.1 – Historic Environment 5.8.22</p>	<p><u>Applicant's Assessment</u> The ES should provide a description of the significance of the heritage assets affected by the proposed development and the contribution of their setting to that significance.</p>	<p>The Applicant has described the significance of heritage assets and the contribution of settings to that significance within ES Chapter 10: Historic Environment (Volume 6.2) [APP-037] at Section 10.5 Baseline. It has also prepared a Gazetteer of Heritage Assets as Appendix 10A (Volume 6.4) [APP-080].</p>	<p>ES Chapter 10: Historic Environment (Volume 6.2) [APP-037]</p> <p>Gazetteer of Heritage Assets as Appendix 10A (Volume 6.4) [APP-080]</p>
	<p>Where available evidence suggests that the development may potentially include assets of archaeological interest, then a desk-based assessment should be carried out. Where the proposed development will affect the setting of a heritage asset,</p>	<p>A desk-based assessment of archaeology has been undertaken and is included as Appendix 10B Archaeology Desk Study (Volume 6.4) [APP-080].</p> <p>The assessment reported within the Chapter undertakes an environmental assessment of historic environment effects</p>	<p>Appendix 10B Archaeology Desk Study (Volume 6.4) [APP-080]</p>



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	<p>representative visualisations may be necessary to explain the impact.</p> <p>The application documents should clearly set out the level of impact on the significance of any affected heritage assets.</p> <p><u>Decision Making</u> The SoS should seek to identify and assess the particular significance of any heritage asset that may be affected by a proposed development, including by development affecting the setting of a heritage asset.</p> <p>There should be a presumption in favour of the conservation of designated heritage assets and the more significant the designated heritage asset, the greater the presumption in favour of its conservation should be.</p> <p>When considering applications for development affecting the setting of a designated heritage asset,</p>	<p>and concludes that these would not be significant.</p> <p>When preparing the detailed CEMP, secured by Draft DCO Requirement 10 (Volume 3.1) [REP1-007], the Applicant commits to preparing an Archaeological Written Scheme of Investigation (WSI) and thereafter implementing it.</p>	



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	<p>the SoS should treat favourably applications that preserve those elements of the setting.</p> <p>When considering applications that do not do this, the SoS should weigh any negative effects against the wider benefits of the application.</p> <p>Where the loss of the whole or a material part of a heritage asset's significance is justified, the SoS should require the developer to record and advance understanding of the significance of the heritage asset before it is lost.</p>		
<p>NPS EN-1: 5.9.1 – Landscape and Visual 5.9.23</p>	<p><u>Applicant's Assessment</u> The ES should contain a landscape and visual assessment which identifies the impact of the proposed development (during construction and operation) on landscape components and character and visual amenity.</p>	<p>The Applicant has undertaken a landscape and visual assessment which is reported in ES Chapter 9: Landscape and Visual (Volume 6.2) [APP-036]. This considers the construction and operation of the Proposed Development and its potential to affect landscape components, character and visual amenity. There are no national or local landscape designations with the potential to be affected. Section 9.7 sets out the embedded environmental measures which include limits to lighting,</p>	<p>ES Chapter 9: Landscape and Visual (Volume 6.2) [APP-036]</p> <p>ES Chapter 3: Description of the Proposed Development (Volume 6.3) [APP-049]</p>



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	<p>Adverse landscape and visual effects may be minimised through appropriate siting of infrastructure, design and landscaping (including offsite) schemes.</p> <p><u>Decision Making</u> Outside nationally designated areas, effects on local landscapes should be considered. However, local landscape designations should not be used in themselves to refuse consent. The SoS should determine whether any adverse impact on the landscape would be so damaging that it is not offset by the benefits (including need) of the proposed development.</p> <p>The decision maker should ensure applicants have taken into account the landscape and visual impacts of visible plumes from chimney stacks and/or the cooling assembly. It may need to attach requirements to the consent requiring the incorporation of particular design details that are in</p>	<p>the commitment to an Outline Landscape and Ecology Strategy (ES Chapter 3 Figure 3.14 Volume 6.3 [APP-049]) and the removal of expansion loops along the CHP Connection where it would run behind residential properties.</p> <p>Table 9.19 Summary of environmental measures to be implemented – relating to landscape and visual sets out the measure and method of compliance. It references the detailed architectural design which minimising the overall massing of the EfW CHP Facility and the considerations given to external cladding together with measures such as the Outline Lighting Strategy and native planting.</p> <p>The Applicant’s commitment to delivering the design commitments are secured by Draft DCO Requirement 2 (Volume 3.1) [REP1-007].</p> <p>The Applicant’s commitment to deliver biodiversity, landscape and ecological mitigation are secure by Draft DCO Requirements 4, 5 and 6 (Volume 3.1) [REP1-007].</p>	



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	keeping with the statutory and technical requirements.	<p>The Applicant's commitment to deliver a suitable lighting scheme, are secure by Draft DCO Requirement 18 (Volume 3.1) [REP1-007] .</p> <p>The extent to which the plume could be viewed is illustrated within ES Chapter 9: Landscape and Visual Figures (Volume 6.3) [APP-053] in Figure 9.6 Visible Plume ZTV. The impacts of the visible plume upon relevant landscape, townscape and visual Receptors are included within the landscape, townscape, and visual assessments of effects in ES Chapter 9: Landscape and Visual Figures Appendices 9G, 9H, 9I, 9J and 9K (all Volume 6.4) [APP-079] summarised in Section 9.9 of the chapter.</p>	
NPS EN-1: 5.10.1 – 5.10.24	<p>Land use including open space, green infrastructure & Green Belt</p> <p><u>Applicant's Assessment</u> The ES should consider the impacts of the proposed development on existing and proposed uses surrounding the application site including open space.</p>	<p>The Applicant has considered the potential to affect existing and proposed uses within ES Chapter 15: Socio Economic Tourism, Recreation and Land Use (Volume 6.2) [APP-042] whilst consideration of best and most versatile land is addressed in Chapter 13: Geology, Hydrogeology and Contaminated Land (Volume 6.2) [APP-040].</p>	<p>ES Chapter 15: Socio Economic Tourism, Recreation and Land Use (Volume 6.2) [APP-042]</p> <p>Chapter 13: Geology, Hydrogeology and Contaminated Land (Volume 6.2) [APP-040]</p>



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	<p>Applicants should seek to minimise impacts on the best and most versatile agricultural land and preferably use land in areas of poorer quality except where this would be inconsistent with other sustainability considerations. Applicants should also identify any effects and seek to minimise impacts on soil quality taking into account any mitigation measures proposed.</p> <p>For developments on previously developed land, applicants should ensure that they have considered the risk posed by land contamination.</p> <p><u>Decision Making</u> The SoS should not grant consent for development on existing open space, sports and recreational buildings and land unless an assessment has been undertaken either by the local authority or independently, which has shown the open space or the buildings and land to be surplus to</p>	<p>There is no publicly available open space surrounding the application site and the consideration of land uses concludes that effects upon existing businesses would not be significant. Cumulative effects with future/proposed uses are considered within ES Chapter 18: Cumulative Effects (Volume 6.2) [APP-045]. This reports that effects would not be significant cumulatively.</p> <p>Chapter 13: Geology, Hydrogeology and Contaminated Land (Volume 6.2) [APP-040] Table 13.14 Geology, Hydrogeology and Contaminated Land Receptors scoped out of further assessment provide the rationale for scoping consideration out of the assessment such that the Order Limits are limited to areas that are either urban in nature or, where agricultural land is present the area affected is small and allocated for development within the Fenland Local Plan 2014.</p>	<p>ES Chapter 18: Cumulative Effects (Volume 6.2) [APP-045]</p>



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	<p>requirements or the SoS determines that the benefits of the proposed development outweigh the potential loss of such facilities.</p> <p>The SoS should ensure that applicants do not site schemes on the best and most versatile agricultural land without justification. Little weight should</p> <p>be given to the loss of poorer quality agricultural land (in grades 3b, 4 and 5).</p>		
<p>NPS EN-1: 5.11.1 – Noise and vibration 5.11.13</p>	<p><u>Applicant's Assessment</u> The applicant should include a noise assessment where noise impacts are likely to arise from the proposed development. Good design principles should be applied to minimise adverse noise impacts including: use of quietest cost-effective plant available; containment of noise within buildings wherever possible; optimisation of plant layout to minimise noise emissions; and, where possible, the use of</p>	<p>The Applicant has undertaken a noise and vibration assessment and this is reported within ES Chapter 7: Noise and Vibration (Volume 6.2) [APP-034]. The chapter identifies the good design principles employed to minimise effects and these embedded mitigation measures are described in Table 7.18 Summary of the embedded environmental measures and how these influence the noise and vibration assessment. Measures include construction undertaken within normal working hours, other than in certain defined circumstances, Operations including the delivery of waste between the hours of 0700 to 2000 and the control of emissions</p>	<p>ES Chapter :7 Noise and Vibration (Volume 6.2) [APP-034]</p> <p>Draft DCO (Volume 3.1) [REP1-007]</p> <p>ES Chapter 16: Health (Volume 6.2) [APP-043]</p>



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	<p>landscaping, bunds or noise barriers to reduce noise transmission.</p> <p><u>Decision Making</u> The SoS should not grant development consent unless satisfied that the proposed development will:</p> <ul style="list-style-type: none"> • avoid significant adverse impacts on health and quality of life from noise; • mitigate and minimise other adverse impacts on health and quality of life from noise; and • where possible, contribute to improvements to health and quality of life through the effective management and control of noise. 	<p>from major process buildings through the use of the building fabric and appropriate specification of noise attenuating louvres and vents. Other measures include for the closure of the tipping hall doors when not in use and the selection of plant and machinery to control any tonal noise emissions.</p> <p>To avoid significant effects upon the occupiers of 10 New Bridge Lane an acoustic fence is proposed and is secured as Work No.10 to the Draft DCO (Volume 3.1) [REP1-007] .</p> <p>The Applicant's commitments to deliver Noise mitigation and monitoring are secured by Requirements 19 of the Draft DCO (Volume 3.1) [REP1-007].</p> <p>ES Chapter 16 Health (Volume 6.2) [APP-043] considers the effects arising from the Proposed Development upon health. Using the assessment conclusions reported within Chapter 15 it concludes that effects upon health would not be significant.</p>	



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NPS EN-1: 5.12.1 – 5.12.9	<p data-bbox="539 285 786 312">Socio-economic</p> <p data-bbox="539 360 875 387"><u>Applicant's Assessment</u></p> <p data-bbox="539 400 1016 868">The ES should contain a socio-economic assessment where the proposed development is likely to have a significant socio-economic impact at the local and/or regional level. The assessment should cover all relevant socio-economic impacts including: jobs and training opportunities; local service provision; local infrastructure provision; education facilities; tourism; and cumulative effects.</p> <p data-bbox="539 916 775 943"><u>Decision Making</u></p> <p data-bbox="539 956 1016 1091">The SoS should have regard to the potential socio-economic impacts of new energy infrastructure.</p>	<p data-bbox="1046 285 1644 1091">The Applicant has considered the potential to affect socio-economics at the local and regional scale within ES Chapter 15: Socio Economic Tourism, Recreation and Land Use (Volume 6.2) [APP-042]. Section 15.6 confirms the Receptors scoped into the assessment and these include jobs (direct and indirect), training, including education, local supply chains/services and local infrastructure provision. It reports upon the Secretary of State's Scoping opinion which confirmed that the direct effects arising from tourism during construction and operation and the demand for housing, local services and community facilities during operation could be scoped out of the assessment (see Section 15.6). Indirect tourism effects and recreation have remained within scope whilst cumulative effects are reported within ES Chapter 18: Cumulative Effects (Volume 6.2) [APP-045].</p> <p data-bbox="1046 1139 1644 1353">The assessment reported in Chapter 15 concludes that there would be no significant adverse effects with significant positive effects during the construction of the Proposed Development upon employment (direct and indirect at the ward</p>	<p data-bbox="1673 285 1998 464">ES Chapter 15: Socio Economic Tourism, Recreation and Land Use (Volume 6.2) [APP-042]</p> <p data-bbox="1673 512 1998 647">ES Chapter: 18 Cumulative Effects (Volume 6.2) [APP-045]</p> <p data-bbox="1673 695 1998 831">Outline Employment and Skills Strategy (Volume 7.8) [APP-098]</p> <p data-bbox="1673 879 1998 1018">Outline Community Benefits Strategy (Volume 7.14) [APP-105]</p>



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		<p>and district level), local suppliers (ward and district).</p> <p>The Applicant has prepared an Outline Employment and Skills Strategy (Volume 7.8) [APP-098], with the detailed strategy secured by Draft DCO Requirement 21 (Volume 3.1) [REP1-007] and Outline Community Benefits Strategy (Volume 7.14) [APP-105], to be prepared and published on the Applicant's website.</p>	
<p>NPS EN-1: 5.13.1 – Traffic and Transport 5.13.12</p> <p><u>Applicant's Assessment</u></p> <p>The ES should contain a transport assessment where the proposed development is likely to have significant transport implications. Applicants should consult with the Highways Authorities and Highways Agencies on the assessment and mitigation.</p> <p>Applicants should prepare a travel plan where appropriate, including demand management measures to mitigate transport impacts and details of proposed measures to</p>		<p>The Applicant has prepared a transport assessment as an appendix to the ES Chapter 6: Traffic and Transport (Volume 6.2) [APP-033]. This is ES Chapter 6: Appendix 6B Transport Assessment (Volume 6.4) [APP-073]. The transport assessment was prepared in consultation with CCC, NCC and National Highways the extent to which is set out within ES Chapter 6: Traffic and Transport Appendix 6D Stakeholder Consultation (Volume 6.4) [APP-075].</p> <p>The Applicant has prepared ES Chapter 6 Appendix 6A Outline Construction Traffic Management Plan (Volume 6.4) [REP1-011] and ES Chapter 6 Appendix</p>	<p>ES Chapter 6: Traffic and Transport (Volume 6.2) [APP-033]</p> <p>ES Chapter 6: Appendix 6B Transport Assessment (Volume 6.4) [APP-073]</p> <p>ES Chapter 6: Traffic and Transport Appendix 6D Stakeholder Consultation</p>



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	<p>improve access by non-car modes to reduce the need for parking and reduce transport impacts.</p> <p>Water-borne or rail transport is preferred over road transport at all stages of the project, where cost-effective.</p> <p><u>Decision Making</u></p> <p>The SoS should ensure that the applicant has sought to mitigate impacts arising from proposals on transport infrastructure.</p> <p>Provided that the applicant is willing to enter into planning obligations or requirements can be imposed to mitigate transport impacts, then development consent should not be withheld, and appropriately limited weight should be applied to residual effects on the surrounding transport infrastructure. Requirements may include controlling the numbers of HGV, routing, providing sufficient parking to avoid queuing on approach roads and arrangements for dealing with</p>	<p>6C Outline Operational Travel Plan (Volume 6.4) [APP-074]. Both documents set out measures to reduce the number of vehicles required to access the Proposed Development and identify existing arrangements for public transport. The Applicant also proposes to extend the existing footpath and street lighting along New Bridge Lane to aid pedestrians.</p> <p>Water-borne and rail transport is not available although the Applicant has set aside land within the EfW CHP Facility Site to accommodate a future railway siding and bridge embankment should the disused March to Wisbech Railway re-open and they be required.</p> <p>The Outline CTMP and Outline Operational Traffic Management Plan (Volume 7.15) [REP1-026] (the former referenced above) include for restrictions to the routing of HGVs whilst sufficient parking including the provision of queuing lanes within the site for HGVs delivering to the EfW CHP Facility have been provided within the layout. Consideration has been given to the delivery of components via abnormal loads within the Outline CTMP whilst this document also includes a</p>	<p>(Volume 6.4) [APP-075]</p> <p>ES Chapter 6: Appendix 6A Outline Construction Traffic Management Plan (Volume 6.4) [REP1-011]</p> <p>ES Chapter 6: Appendix 6C Outline Operational Travel Plan (Volume 6.4) [APP-074]</p> <p>ES Chapter 6: Traffic and Transport Appendix 6D Stakeholder Consultation (Volume 6.4) [APP-075]</p>



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	reasonably foreseeable abnormal disruption.	<p>commitment by the Applicant to provide advanced warning of works that may potentially affect the highway to the relevant highway authorities and service providers such as the emergency services.</p> <p>The Applicant's traffic and transported related commitments are secured by the following Draft DCO Requirements (Volume 3.1) [REP1-007]:</p> <ul style="list-style-type: none"> • Requirement 7 – Highway Access; • Requirement 10 – Construction Environmental Management Plan; • Requirement 11 – Construction Traffic Management Plan; • Requirement 12 – Operational Traffic Management Plan; and • Requirement 15 Operational Travel Plan. <p>Detailed arrangements with the relevant highways authority to secure the proposed New Bridge Lane Access Improvements are to be secured by a Section 278 Agreement with CCC. The Applicant will provide status updates on these discussions during the Examination.</p>	



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NPS EN-1: 5.14.1 - 5.14.9	<p data-bbox="539 285 837 312">Waste Management</p> <p data-bbox="539 360 875 387"><u>Applicant's Assessment</u></p> <p data-bbox="539 400 1016 834">Applicants should prepare a Site Waste Management Plan (SWMP) detailing the proposed waste recovery and disposal system for all waste generated by the development, and an assessment of the impact of the waste arising from development on the capacity of waste management facilities to deal with other waste arising in the area for at least five years of operation.</p> <p data-bbox="539 879 1016 1206">Where the proposed development will be subject to the Environmental Permitting regime, waste management arrangements during operations will be covered by the permit and the considerations set out in Section 4.10 of NPS-EN1 will apply.</p> <p data-bbox="539 1251 770 1278"><u>Decision Making</u></p> <p data-bbox="539 1291 1016 1390">The SoS should consider the extent to which the applicant has proposed an effective system for</p>	<p data-bbox="1046 285 1644 539">The Applicant sets out how waste will be managed during construction and operation within ES Chapter 3: Description of the Proposed Development (Volume 6.2) [APP-030] at pages 52 (operation) and 69 (construction).</p> <p data-bbox="1046 620 1644 799">The Applicant applied to the Environment Agency for an Environmental Permit for the EfW CHP Facility on the 5 August 2022. The application reference is EPR/HP3441QA/A001.</p> <p data-bbox="1046 842 1644 1129">On 14 April 2023 the Applicant received a letter from the Environment Agency stating that it considers the application to be of 'high public interest' and setting out the implications of this, including the need for extra consultation by the Agency and that the time taken to reach a decision is likely to be longer.</p> <p data-bbox="1046 1173 1644 1353">On 13 April 2023 the Environment Agency confirmed the Applicant's Environmental Permit Application was duly made and that a letter to confirm will be issued imminently.</p>	<p data-bbox="1673 285 1998 504">ES Chapter 3: Description of the Proposed Development (Volume 6.2) [APP-030]</p>



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	managing hazardous and non-hazardous waste arising from the construction, operation and decommissioning of the proposed development.	The Applicant will continue to engage with the Environment Agency and to update the ExA on the progress of the application during the course of the DCO examination.	
NPS EN-1: 5.15.1 - 5.15.10	<p>Water Quality and Resources</p> <p><u>Applicant's Assessment</u></p> <p>The ES should contain an assessment of water quality and resources where the proposed development is likely to impact on the water environment. This assessment should describe:</p> <ul style="list-style-type: none"> • impacts on water quality, noting any relevant existing discharges, proposed new discharges and proposed changes to discharges; • impacts on water resources, noting proposed changes to abstraction rates; • existing physical characteristics of the water environment and any impact of physical 	<p>The Applicant has undertaken an assessment of the effects arising from the Proposed Development upon water, including water quality and resources within ES Chapter 12: Hydrology (Volume 6.2) [APP-039].</p> <p>The baseline conditions are established within Section 12.5 with water resources considered in paragraphs 12.5.29 to 12.5.33 and water quality in paragraphs 12.5.34 to 12.5.38. There is one licensed non-public surface water abstraction within the Study Area. Water quality effects during construction on statutory nature conservation sites are scoped from the assessment due to the distance from the Proposed Development together with the embedded mitigation measures proposed.</p> <p>The assessment also considers affects upon water bodies protected under the WFD.</p>	<p>ES Chapter 3: Description of the Proposed Development (Volume 6.2) [APP-030]</p> <p>ES Chapter 3: Description of the Proposed Development (Volume 6.2) [APP-030]</p> <p>Draft DCO (Volume 3.1) [REP1-007]</p>



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	<p>modifications to these characteristics; and</p> <ul style="list-style-type: none"> impacts on water bodies or protected areas under the Water Framework Directive (WFD) and source protection zones (SPZs) around potable groundwater abstractions. <p><u>Decision Making</u> The SoS will need to give impacts on the water environment more weight where a project would have an adverse effect on the achievement of the environmental objectives established under the WFD.</p>	<p>The assessment conclusions are set out in Table 12.19 Summary of significance of adverse effects. It concludes that effects upon aquatic environment Receptors resulting from all hydrological effects to include water quality and water resources would not be significant during construction and operation. Other water resource Receptors (e.g., Anglian water resources) will also not be significantly affected.</p> <p>Effects upon water quality, for example as a result of sediment laden runoff with embedded mitigation in place would not be significant. Mitigations include for the Materials Management Plan which forms an appendix to the Outline Construction Environmental Management Plan (Volume 7.12) [REP1-024].</p> <p>The Applicant's commitment to suitably manage flood risk and surface water drainage matters for the construction and operational phase are secured by Draft DCO Requirement 8, 9 and 10 (Volume 3.1) [REP1-007].</p>	
Revised Draft NPS EN-1: 3.3.39 – 3.3.40	The need for new nationally significant electricity Infrastructure	DEFRA's waste management policy is set out in the following key documents:	Waste Availability Assessment (Volume 7.3) [REP2-009] Fuel



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	<p>Applicants must demonstrate that proposed facilities are in line with the Department for Environment, Food & Rural Affairs' (Defra) policy position on the role of energy from waste in treating municipal waste.</p> <p>The proposed plant must not compete with greater waste prevention, re-use, or recycling, or result in over-capacity of EfW treatment at a national or local level.</p>	<ul style="list-style-type: none"> • The Waste Management Plan for England (January 2021); and • The Resources and Waste Strategy 'Our Waste, Our Resources: A Strategy for England' (2018). <p>Together, these documents set out the Government's strategy to move toward a circular economy and hit its net zero emissions targets in line with its 25 Year Environment Plan. Greater efficiency of energy from waste facilities is recognised as of high importance in the Government's Waste Management Plan, with an aim of ensuring that all future energy from waste plants achieve recovery (R1) status by producing heat for heat networks. This reduces emissions significantly by making use of otherwise wasted heat to displace gas boiler heating.</p> <p>The R1 calculation is certified by the Environment Agency. To be classified as a recovery operation the R1 value must exceed 0.65. Using the Environment Agency's guidance note (Waste incineration plant: apply for R1 status (Aug 2021)) the Applicant has calculated the EfW CHP Facility's R1 value. At 0.81 the R1 value for the EfW CHP Facility far</p>	<p>Technical Note: R1 (Volume 9.25)</p>



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		<p>exceeds the 0.65 threshold to be classified as a recovery operation. The Applicant's R1 calculation is provided in the Technical Note: R1 (Volume 9.24) [REP1-058] submitted at Deadline 1.</p> <p>The Proposed Development fully complies with the provisions of DEFRA policy in that it would have R1 status and has been designed to recover both heat and power from residual household, industrial and commercial waste.</p> <p>The Proposed Development will not compromise recycling rates. It uses residual waste as fuel. This is the waste which cannot be recycled.</p> <p>The Applicant has prepared a Waste Fuel Availability Assessment (Volume 7.3) [REP2-009]. This considers the availability of fuel (residual waste) at a local and national level and demonstrates that there is sufficient waste, currently landfilled, to support the facility. An updated version of the Waste Fuel Availability Assessment was submitted at Deadline 2 [REP2-009].</p> <p>The Waste Fuel Availability Assessment (Volume 7.3) [REP2-009] has assessed</p>	



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Revised Draft NPS EN-1: 4.3.6	<p>Health</p> <p>Opportunities should be taken to mitigate indirect impacts on health by promoting local improvements to encourage health and wellbeing including in respect of potential impacts on vulnerable groups within society.</p>	<p>both the regional requirement for the EfW CHP Facility as well as the national need. It has concluded that there is insufficient residual waste management capacity available to ensure that our non-recyclable waste can be managed as far up the waste hierarchy as possible. The Proposed Development will therefore not result in over-capacity of EfW treatment at a national or local level.</p> <p>Chapter 16: Health (Volume 6.2) [APP-043] of the ES provides an assessment of the health impacts of the Proposed Development, focusing on effects on the population, including vulnerable groups, rather than individuals. The health impacts considered include (<i>inter alia</i>):</p> <ul style="list-style-type: none"> • economic impacts (including jobs creation) during construction and operation of the Proposed Development; • impacts on healthcare facilities during construction of the Proposed Development; • severance during construction and operation of the Proposed Development; • perceptions of risk affecting health and wellbeing; 	<p>ES Chapter 16: (Volume 6.2) [APP-043]</p> <p>Outline CEMP (Volume 7.12) [REP1-024]</p> <p>Outline Odour Management Plan (Volume 7.11) [REP1-021]</p> <p>Outline Employment and Skills Strategy (Volume 7.8) [APP-099]</p> <p>Draft DCO (Volume 3.1) [REP1-007]</p>



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		<ul style="list-style-type: none"> • noise and vibration effects arising from the construction and operation of the Proposed Development; • emissions to air arising from the construction and operation of the Proposed Development; and • EMFs. 	
		<p>The assessment has been informed by the other environmental topic chapters of the ES, as appropriate. It has taken into account measures embedded into the design of the Proposed Development to mitigate health impacts including (<i>inter alia</i>):</p>	
		<ul style="list-style-type: none"> • implementation of the Outline CEMP (Volume 7.12) [REP1-024] submitted with the DCO Application; • optimisation of chimney heights to ensure adequate dispersion of emissions from the EfW CHP Facility; • implementation of selective non-catalytic reduction (SNCR) within the furnace to reduce emissions to air; • transport, handling and processing of waste in enclosed buildings and covered vehicles and implementation of the Outline 	



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Odour Management Plan (Volume 7.11) [REP1-021] to avoid odour effects;

- implementation of the **Outline Employment and Skills Strategy (Volume 7.8) [APP-099]** submitted with the DCO Application to maximise the use of, and upskill, the local workforce; and
- provision of an acoustic fence to 10 New Bridge Lane.

The assessment identifies the potential for moderate and probably significant beneficial effects on the local economically active population arising from the creation of temporary direct and indirect employment opportunities during construction of the Proposed Development.

Significant adverse effects are identified in respect of severance during construction and operation associated with increased HGV movements, although proposals for a new pedestrian crossing reduce the residual effect to not significant.

The assessment identifies the potential for major and significant negative health effects on residential and non-residential



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Receptors due to noise impacts during construction; however, with mitigation the residual effect is reduced to not significant. Noise arising from the operation of the proposed EfW CHP Facility is also assessed as having a significant negative health effect at the nearest dwellings at 9 and 10 New Bridge Lane. However, the assessment confirms that with the implementation of additional mitigation measures, impacts will again be reduced such that the resultant effects are not significant. Further, the assessment concludes that, given the number of dwellings involved, operational noise will not impact on health within the wider population, including vulnerable groups.

No further significant health effects have been identified in the health assessment presented at **Chapter 16: Health (Volume 6.2) [APP-043]** of the ES.

The aforementioned matters are secured under the **Draft DCO (Volume 3.1) [REP1-007]**:

- Requirement 10 – CEMP;
- Requirement 16 – Odour Management Plan; and



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Revised Draft NPS EN-1: 4.5.4 – 4.5.16	Environmental and Biodiversity Net Gain	<ul style="list-style-type: none"> Requirement 21 – Employment and Skills Strategy. 	ES Chapter 11: Biodiversity Rev 2 (Volume 6.2) [AS-008]
	<p>Energy NSIP proposals, whether onshore or offshore should seek opportunities to contribute to, and enhance, the natural environment by providing net gains for biodiversity, or the wider environment where possible.</p>	<p>The Proposed Development seeks to provide an overall biodiversity enhancement by delivering a 10% BNG including both onsite and offsite measures.</p>	ES Chapter 11: Biodiversity Appendix 11M Biodiversity Net Gain rev 3 (Volume 6.4) submitted at Deadline 3
	<p>In England applicants for onshore elements of any development are encouraged to use the most current version of the Defra biodiversity metric to calculate their biodiversity baseline and present planned biodiversity net gain outcomes. This calculation data should be presented in full as part of their application.</p>	<p>The approach to delivering BNG is outlined in Section 11.10 of ES Chapter 11: Biodiversity Rev 2 (Volume 6.2) [AS-008] and within ES Chapter 11 Biodiversity Appendix 11M Biodiversity net Gain rev 3 (Volume 6.4) [submitted at Deadline 3. The assessment used the most current version of the Defra biodiversity metric at the time of DCO submission. It also considers the policy context of BNG in Section 1.5. A further update to the BNG Strategy (Volume 6.4) [AS-009] was submitted at Deadline 3 to set out the approach to finalising the BNG strategy.</p>	Applicant’s response to the ExA’s Written Questions (ExQ1) – Appendix 10.2 C: Biodiversity Net Gain: Next Steps – Update March 2023 (Volume 10.2) [REP2-019].
	<p>Biodiversity net gain can be delivered onsite or wholly or partially off-site. Any off-site delivery of biodiversity net gain should also be set out within the</p>	<p>The Applicant is seeking to deliver some of the BNG offsite. A summary of third party engagement to investigate opportunities for offsite BNG is set out in Applicant’s response to the ExA’s Written Questions (ExQ1) – Appendix 10.2 C:</p>	Draft DCO (Volume 3.1) [REP1-007]
			Outline Community Benefits Strategy



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	<p>application for development consent.</p> <p>When delivering biodiversity net gain off-site, developments should do this in a manner that best contributes to the achievement of relevant wider strategic outcomes, for example by increasing habitat connectivity or enhancing other ecosystem service outcomes. Reference should be made to relevant national or local plans and strategies, to inform off-site biodiversity net gain delivery. If published, the relevant strategy is the Local Nature Recovery Strategy (LNRS). If an LNRS has not been published, the relevant consenting body or planning authority may specify alternative plans, policies or strategies to use.</p> <p>In addition to delivering biodiversity net gain (BNG), developments may also deliver wider environmental gains and benefits to communities relevant</p>	<p>Biodiversity Net Gain: Next Steps – Update March 2023 (Volume 10.2) [REP2-019].</p> <p>The Applicant’s commitment to deliver biodiversity net gain is secured by Draft DCO Requirements 6 (Volume 3.1) [REP1-007].</p> <p>A natural capital assessment has not been carried out for the Proposed Development as this is not a policy requirement and it was not requested during scoping, pre or post application consultation or engagement. Appendix 11M Biodiversity Net Gain (Volume 6.4) [AS-009] did use the mapping tools referenced as an aid to determining the strategic significance of habitats and the opportunities for habitat creation and enhancement.</p>	<p>(Volume 7.14) [APP-105]</p> <p>Outline Landscape and Ecology Management Plan (Volume 7.7) [APP-098]</p> <p>Figure 3.14 Outline Landscape and Ecology Strategy (Volume 6.3) [REP2-026].</p>



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	<p>to the local area, and to national policy priorities.</p> <p>Applications for development consent should be accompanied by a statement demonstrating how opportunities for delivering wider environmental net gains have been considered, and, where appropriate, incorporated into proposals as part of good design of the proposed development.</p> <p>Applicants should make use of available guidance and tools for measuring natural capital assets and ecosystem services, such as the Natural Capital Committee's 'How to Do it: natural capital workbook', Defra's guidance on Enabling a Natural Capital Approach (ENCA), and other tools that aim to enable wider benefits for people and nature.</p>		
Revised Draft NPS EN-1: 4.6.5, 4.6.8	Criteria for “Good Design” for Energy Infrastructure	The design process for the Proposed Development has been informed by the technology type, by comments received at non-statutory and statutory consultation	DAS (Volume 7.5) [APP-096].



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	<p>To ensure good design is embedded within the project development, a project board level design champion could be appointed, and a representative design panel used to maximise the value provided by the infrastructure. Design principles should be established from the outset of the project to guide the development from conception to operation.</p> <p>Applicants should consider taking independent professional advice on the design aspects of a proposal. In particular, the Design Council can be asked to provide design review for nationally significant infrastructure projects and applicants are encouraged to use this service. Applicants should also consider any design guidance developed by the local planning authority.</p>	<p>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].</p> <p>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). These principles are informed by national and local policy including:</p> <ul style="list-style-type: none"> • Design Principles for National Infrastructure (National Infrastructure Commission Design Group, 2020); and • A Design Led Approach to Infrastructure (UK Design Council (formerly Commission for Architecture and the Built Environment), 2012). <p>Stage 2 of the design process – the post DCO consent stage – involves the preparation of detailed design drawings and further consultation and approval of</p>	



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Revised Draft NPS EN-1: 4.7.11	<p>Consideration of Combined Heat and Power</p> <p>Where the applicant is not be able to reach an agreement with a potential customer, they should provide evidence demonstrating the reasons for this, and why it will not be reasonably possible to reach an agreement during the lifetime of the thermal station.</p>	<p>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.</p> <p>The Applicant is committed to delivering CHP which is one of the key determinants for site selection. The Applicant has engaged with local businesses and is confident that subsequent to a DCO being granted, that agreements can be reached.</p> <p>The site's location is deemed to be suitable for CHP. The BEIS CHP Development Map identifies Wisbech as having a large heat load whilst the Applicant's CHP Assessment [APP-097] demonstrates the viability of CHP in the context of the Proposed Development. The Draft DCO (Volume 3.1) [REP1-007] contains Requirement 25 which requires the Applicant to prepare and submit an update to the CHP Assessment 18 months following final commissioning, to set out the measures it is taking to promote and implement CHP and to submit regular reports thereafter.</p>	<p>CHP Assessment [APP-097]</p> <p>The Draft DCO (Volume 3.1) [REP1-007]</p>



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Revised Draft NPS EN-1: 4.9.5 – 4.9.12	<p data-bbox="539 288 954 320">Climate Change Adaptation</p> <p data-bbox="539 363 1016 576">In preparing measures to support climate change adaptation, applicants should take reasonable steps to maximise the use of nature-based solutions alongside other conventional techniques.</p> <p data-bbox="539 624 1016 1241">New energy infrastructure will typically be a long-term investment and will need to remain operational over many decades, in the face of a changing climate. Consequently, applicants must consider the direct (e.g. site flooding, limited water availability, storms, heatwave and wildfire threats to infrastructure and operations) and indirect (e.g. access roads or other critical dependencies impacted by flooding, storms, heatwaves or wildfires) impacts of climate change when planning the location, design, build, operation</p>	<p data-bbox="1046 288 1644 834">ES Chapter 14: Climate (Volume 6.2) [APP-041] includes an assessment of the projected impacts of climate change on the Proposed Development during construction, operation and decommissioning. This assessment of climate change resilience is based on UK Climate Projections 18 produced by the Met Office and draws on data from the Third Climate Change Risk Assessment published by the UK Government in January 2022³ and the latest evidence prepared by the Adaptation Committee presented in the Independent Assessment of UK Climate Risk 2021⁴.</p> <p data-bbox="1046 879 1644 1018">The assessment takes account of the design measures built into the Proposed Development to ensure climate resilience. These measures include:</p> <ul data-bbox="1093 1066 1644 1241" style="list-style-type: none"> • design of Proposed Development to be resilient to current weather impacts; • implementation of a flexible construction programme to 	<p data-bbox="1673 288 1998 395">ES Chapter 12: Hydrology (Volume 6.2) [APP-039]</p> <p data-bbox="1673 435 1998 542">ES Appendix 12A FRA (Volume 6.4) [APP-084]</p> <p data-bbox="1673 582 1998 689">ES Chapter 14: Climate (Volume 6.2) [APP-041]</p> <p data-bbox="1673 729 1998 799">Draft DCO (Volume 3.1) [REP1-007]</p>

³ UK Government. UK Climate Change Risk Assessment 2022.

⁴ Betts, R.A. and Brown, K, (2021). Introduction. In: *The Third UK Climate Change Risk Assessment Technical Report* [Betts, R.A., Haward, A.B. and Pearson, K.V.(eds.)]. Prepared for the Climate Change Committee, London.



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	<p>and, where appropriate, decommissioning of new energy infrastructure.</p> <p>The ES should set out how the proposal will take account of the projected impacts of climate change, using government guidance and industry standard benchmarks such as the Climate Change Allowances for Flood Risk Assessments Climate Impacts Tool and British Standards for climate change adaptation, in accordance with the EIA Regulations.</p> <p>Applicants should demonstrate that proposals have a high level of climate resilience built-in from the outset and should also demonstrate how proposals can be adapted over their predicted lifetimes to remain resilient to a credible maximum climate change scenario. These results should be considered alongside relevant research which is based on the climate change projections.</p>	<p>integrate extreme weather-related delays and allow flexibility of timings of critical activities;</p> <ul style="list-style-type: none"> • a requirement for contractors to sign up for short to medium range weather forecasting alerts; • installation of lightning protection systems where required; • design of Proposed Development to give consideration to climate change adaptation in line with relevant standards and future climate; • measures to reduce the impact of extreme weather on construction; • design of the drainage systems to include consideration for resilience to climate change; • protection of the waste bunker against groundwater ingress and uplift; • use of climate suitable species in landscape planting; and • reduction in the reliance on potable water to be implemented e.g., rainwater harvesting. <p>On the basis of the measures embedded into the design of the Proposed Development, the climate change</p>	



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	<p>Where energy infrastructure has safety critical elements (for example parts of new gas-fired power stations or some electricity sub-stations), the applicant should apply a credible maximum climate change scenario. It is appropriate to take a risk-averse approach with elements of infrastructure which are critical to the safety of its operation.</p>	<p>resilience assessment concludes that there would be no significant effects.</p> <p>The direct and indirect effects of climate change are additionally considered (as appropriate) in other ES environmental topic chapters. This includes the assessment of hydrological impacts in ES Chapter 12: Hydrology (Volume 6.2) [APP-039] which has been informed by an FRA (Appendix 12A: FRA (Volume 6.4) [APP-084]), and applies a credible maximum climate change scenario.</p> <p>The Applicant's commitment to suitably manage climate change impacts associated with and flood risk and surface water drainage and landscape planting are secured by Draft DCO Requirement 5 and 8 (Volume 3.1) [REP1-007].</p>	
<p>Revised Draft NPS EN-1: 5.3.1 – 5.3.10</p>	<p><u>Greenhouse Gas Emissions</u></p> <p><u>Applicant Assessment</u></p> <p>Proposals for energy infrastructure projects should include a GHG assessment as part of the ES.</p>	<p>ES Chapter 14: Climate (Volume 6.2) [APP-041] includes a carbon assessment of the Proposed Development during its construction, operation and decommissioning. The Applicant has identified and embedded measures to reduce emissions and these are reported within the ES chapter at Table 14.15 Summary of the embedded environmental</p>	<p>ES Chapter 14: Climate (Volume 6.2) [APP-041]</p> <p>Draft DCO (Volume 3.1) [REP1-007].</p>



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	<p>Applicants should look for opportunities to embed nature-based or technological solutions to mitigate or offset the emissions of construction and decommissioning. Steps taken to minimise and offset emissions should be set out in a GHG Reduction Strategy.</p> <p><u>Decision Making</u> The SoS must be satisfied that the applicant has, as far as possible, assessed the GHG emissions of all stages of the development. The SoS should also give positive weight to projects that embed nature-based or technological processes to mitigate or offset the emissions of construction and decommissioning within the proposed development.</p> <p>In light of the vital role energy infrastructure plays in the process of economy wide decarbonisation, the SoS accepts that there are likely to be some residual emissions from construction and decommissioning of energy</p>	<p>measures and how these have influenced the climate assessment. For example, measures include the fact that the EfW CHP Facility has been designed to export heat and power to nearby industrial users and thereby displace fossil fuel derived energy and heat otherwise required to facilitate the relevant industrial processes. In addition to the measures set out in the table, the Applicant is proposing brown roofs to the Administration building and Weighbridge, rainwater harvesting and grey water recycling and the use of SUDs.</p> <p>The EfW CHP Facility will be constructed to achieve a minimum BREEAM rating of 'Good', except for the administration building where the minimum rating will be 'Excellent'.</p> <p>The Applicant's commitment to delivering the design commitments are secured by Draft DCO Requirement 2 (Volume 3.1) [REP1-007].</p> <p>The Applicant's commitment to identifying the opportunities for the export of heat and taking action to increase the potential for the export of heat is secured via</p>	



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	<p>infrastructure. Government has determined that operational GHG emissions are not reasons to prohibit the consenting of energy projects and the SoS does not need to assess individual applications for planning consent against operational carbon emissions and their contribution to carbon budgets, net zero and the UK's international climate commitments.</p>	<p>Requirement 25 of the Draft DCO (Volume 3.1) [REP1-007].</p> <p>In addition, the Applicant's commitments to decarbonisation readiness by ensuring part of the EfW CHP Facility Site is reserved for use for Carbon Capture Storage and Export (Requirement 22), and to investigate biannually the feasibility of carbon capture technology and export for delivery at the EfW CHP Facility Site (Requirement 23) are secured by Draft DCO (Volume 3.1) [REP1-007].</p>	
<p>Revised Draft NPS EN-1: 5.4.19, 5.4.21, 5.4.36 – 5.4.38, 5.4.39</p>	<p><u>Biodiversity and Geology Conservation</u></p> <p><u>Applicant Assessment</u></p> <p>The design process should embed opportunities for nature inclusive design. Energy infrastructure projects have the potential to deliver significant benefits and enhancements beyond Biodiversity Net Gain, which result in wider environmental gains..</p>	<p>The Proposed Development has sought to minimise the loss of existing biodiversity within the application site and to maximise opportunities for its creation. It has done this by developing on a predominantly previously developed land allocated within the former Cambridgeshire and Peterborough Minerals and Waste Local Plan and current, adopted Fenland Local Plan as a site for waste management. The Grid connection design has evolved to following existing highway land such that it would not cross open countryside and associated habitats. The biodiversity assessment ES Chapter 11: Biodiversity</p>	<p>Outline Landscape and Ecology Management Plan (Volume 7.7) [APP-098]</p> <p>ES Chapter 11: Biodiversity (Volume 6.4) [AS-008]</p> <p>ES Chapter 11: Biodiversity Appendix 11M Biodiversity Net Gain Rev 3 (Volume 6.4)</p>



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	<p>Proposals should consider any opportunities to maximise the restoration, creation and enhancement of wider biodiversity. Applicants produce and implement a Biodiversity Management Strategy and, where appropriate, a Geodiversity Management Strategy.</p> <p>The design of Energy NSIP proposals will need to consider the movement of mobile / migratory species such as birds, fish and marine and terrestrial mammals and their potential to interact with infrastructure.</p> <p><u>Decision Making</u> The SoS should have regard to the aims and goals of the government's Environmental Improvement Plan and any relevant measures and targets, including statutory targets set under the Environment Act or elsewhere.</p>	<p>(Volume 6.4) [AS-008] and Habitats Regulations Assessment No Significant Effects Report (NSER) - Rev 2 (Volume 5.3) [AS-007] consider the movement of mobile / migratory species such as birds, fish and marine and terrestrial mammals and their potential to interact with the Proposed Development. No significant effects were identified, and environmental measures have been embedded into the Proposed Development to minimise effects on fauna (Outline Landscape and Ecology Management Plan (Volume 7.7) [APP-098] and Outline Ecological Management Plan in Appendix D of the CEMP (Volume 7.12) [REP1-024].</p> <p>The Applicant's landscape and ecology management strategy seeks to enhance the ecology of the site using native species whilst the Outline Landscape and Ecology Management Plan (Volume 7.7) [APP-098] sets out the measures to ensure that the landscaping is managed with biodiversity to the fore.</p> <p>The Applicant has undertaken a biodiversity net gain calculation using the current methodology and is committed via</p>	<p>REP3-TBC submitted at Deadline 3</p> <p>Draft DCO (Volume 3.1) [REP1-007].</p>



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		<p>the ES Chapter 11: Biodiversity Appendix 11M Biodiversity Net Gain Rev 3 (Volume 6.4) document submitted at Deadline 3 to delivering net gain as a result of the Proposed Development.</p> <p>The EfW CHP Facility will be constructed to achieve a minimum BREEAM rating of 'Good', except for the administration building where the minimum rating will be 'Excellent'.</p> <p>The Applicant's commitment to delivering the design commitments are secured by Draft DCO Requirement 2 (Volume 3.1) [REP1-007].</p>	
<p>Revised Draft NPS EN-1: 5.9.9; 5.9.13 –5.9.25; 5.9.31</p>	<p>Historic Environment</p> <p><u>Applicant Assessment</u></p> <p>Applicants should undertake an assessment of any likely significant heritage impacts. The applicant is encouraged, where opportunities exist, to prepare proposals which can make a positive contribution to the historic environment, and to consider how their scheme takes account of the significance of heritage assets affected. Proposals that preserve</p>	<p>The Applicant has described the significance of heritage assets including non-designated assets and the contribution of settings to that significance within ES Chapter 10: Historic Environment (Volume 6.2) [APP-037] at Section 10.5 Baseline. It has also prepared a Gazetteer of Heritage Assets as Appendix 10A (Volume 6.4) [APP-080].</p> <p>A desk-based assessment of archaeology has been undertaken and is included as Appendix 10B Archaeology Desk Study</p>	<p>ES Chapter 10: Historic Environment (Volume 6.2) [APP-037]</p> <p>Gazetteer of Heritage Assets as Appendix 10A (Volume 6.4) [APP-080]</p> <p>Appendix 10B Archaeology Desk Study (Volume 6.4) [APP-080]</p>



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	<p>those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably.</p> <p><u>Decision Making</u> The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining applications.</p>	<p>(Volume 6.4) [APP-080]. Provision will be made for archaeological recording to be completed in accordance with an agreed Written Scheme of Investigation which is secured in the Outline Construction Environmental Management Plan (Volume 7.12) [REP1-024] and by Draft DCO Requirement 10 (Volume 3.1) [APP-013].</p> <p>The assessment reported within the Chapter undertakes an environmental assessment of historic environment effects and concludes that these would not be significant.</p>	<p>Outline Construction Environmental Management Plan (Volume 7.12) [REP1-024].</p> <p>Draft DCO (Volume 3.1) [REP1-007].</p>
<p>Revised Draft NPS EN-1: 5.10.15, 5.10.23</p>	<p>Landscape and Visual</p> <p><u>Applicant Assessment</u> Applicants should consider how landscapes can be enhanced using landscape management plans.</p>	<p>The Applicant has prepared an Outline Landscape and Ecology Strategy as Figure 3.14 to ES Chapter 3: Description of the Proposed Development (Volume 6.3) [APP-049]. This proposes to introduce landscaping to the EfW CHP Facility frontage to New Bridge Lane which would provide a landscape using native species common in the surrounding area.</p>	<p>ES Chapter 3: Description of the Proposed Development (Volume 6.3) [APP-049]</p>
<p>Revised Draft NPS EN-1: 5.11.14, 5.11.27.</p>	<p>Land Use</p> <p><u>Applicant Assessment</u></p>	<p>The Applicant has prepared a Soil Management Plan as Appendix C to the Outline Construction Environmental</p>	<p>Outline Construction Environmental Management Plan</p>



NPS Para No.	Relevant Requirement of the National NPS	Scheme compliance with the National NPS	Examination document
	<p>Applicants are encouraged to develop and implement a Soil Management Plan.</p> <p>Existing trees and woodlands should be retained wherever possible. The applicant should assess the impacts on, and loss of, all trees and woodlands within the project boundary and develop mitigation measures to minimise adverse impacts and any risk of net deforestation as a result of the scheme. Mitigation may include the use of buffers to enhance resilience, improvements to connectivity, and improved woodland management. Where woodland loss is unavoidable, compensation schemes will be required, and the long-term management and maintenance of newly planted trees should be secured.</p>	<p>Management Plan (Volume 7.12) [REP1-024]; secured by Draft DCO Requirement 10 (Volume 3.1) [REP1-007].</p> <p>The impact on trees and woodland has been considered in ES Chapter 11: Biodiversity (Volume 6.2) [AS-007] and the Tree Survey (Volume 7.13) [APP-104]. Mitigation measures are set out in the Outline CEMP (Volume 7.12) [REP1-024], an updated version of which will be submitted at Deadline 3.</p>	<p>(Volume 7.12) [REP1-024]</p> <p>Draft DCO (Volume 3.1) [REP1-007]</p> <p>ES Chapter 11: Biodiversity (Volume 6.2) [AS-007]</p> <p>Tree Survey (Volume 7.13) [APP-104]</p>
<p>Revised Draft NPS EN-1: 5.12.16</p>	<p>Noise and Vibration</p> <p><u>Decision Making</u></p> <p>A development must be undertaken in accordance with statutory requirements for noise.</p>	<p>ES Chapter 7: Noise and Vibration (Volume 6.2) [APP-034] references the policy and legislation which has informed the assessment. Table 7.7 summarises the NPSE and the NPPF. It states that the policy requirements of both documents</p>	<p>ES Chapter 7: Noise and Vibration (Volume 6.2) [APP-034]</p>



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	Due regard must be given to the relevant sections of the Noise Policy Statement for England (NPSE), the National Planning Policy Framework (NPPF), and the Government's associated planning guidance on noise.	have been considered throughout the assessment and preparation of the environmental statement. Construction noise and dust mitigation is addressed within the Applicant's Outline CEMP (Volume 7.12) [REP1-024] and operational noise management measures are secured by Requirement 19 of the Draft DCO (Volume 3.1) [REP1-007] .	Outline CEMP (Volume 7.12) [REP1-024] Draft DCO (Volume 3.1) [REP1-007] .
Revised Draft NPS EN-1: 5.13.12	Socio-economic Impacts <u>Decision Making</u> The SoS may wish to include a requirement that specifies the approval by the local authority of an employment and skills plan.	The Applicant has prepared an Outline Employment and Skills Strategy (Volume 7.8) [APP-099] . The Draft DCO (Volume 3.1) [REP1-007] includes Requirement 21 which requires a final strategy to be submitted to the relevant planning authority for approval.	Outline Employment and Skills Strategy (Volume 7.8) [APP-099] Draft DCO (Volume 3.1) [REP1-007]
Revised Draft NPS EN-1: 5.14.21	Traffic and Transport <u>Decision Making</u> The SoS should only consider preventing or refusing development on highways grounds if there would be an unacceptable impact on highway safety, or residual cumulative impacts on the road network would be severe.	The Applicant has prepared a transport assessment as an appendix to the ES Chapter 6: Traffic and Transport (Volume 6.2) [APP-033] . This is ES Chapter 6: Appendix 6B Transport Assessment (Volume 6.4) [APP-073] . The transport assessment was prepared in consultation with CCC, NCC and National Highways the extent to which is set out within ES Chapter 6: Traffic and Transport Appendix 6D Stakeholder Consultation (Volume 6.4) [APP-075] . The assessment concludes that there	ES Chapter 6: Traffic and Transport (Volume 6.2) [APP-033] ES Chapter 6: Appendix 6B Transport Assessment (Volume 6.4) [APP-073] ES Chapter 6: Traffic and Transport



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		<p>would be no significant effects upon highway safety as a result of the construction or operation of the Proposed Development. The assessment also considers the future growth of traffic on the network and this includes for other developments. This assessment maintains the conclusion that effects would not be significant.</p> <p>The Applicant's traffic and transported related commitments are secured by the following Draft DCO Requirements (Volume 3.1) [REP1-007]:</p> <ul style="list-style-type: none"> • Requirement 7 – Highway Access; • Requirement 10 – Construction Environmental Management Plan; • Requirement 11 – Construction Traffic Management Plan; • Requirement 12 – Operational Traffic Management Plan; and • Requirement 15 Operational Travel Plan. <p>Detailed arrangements with the relevant highways authority to secure the proposed New Bridge Lane Access Improvements are to be secured by a Section 278</p>	<p>Appendix Stakeholder Consultation (Volume 6.4) [APP-075] 6D</p>



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Revised Draft NPS EN-1: 5.15.6 – 5.15.7, 5.15.12 – 5.15.13	<p data-bbox="539 464 1016 531"><u>Resource and Waste Management</u></p> <p data-bbox="539 576 853 608"><u>Applicant Assessment</u></p> <p data-bbox="539 651 1016 831"><u>Applicants must demonstrate that development proposals are in line with Defra’s policy position on the role of energy from waste in treating municipal waste.</u></p> <p data-bbox="539 874 1016 1126"><u>The proposed plant must not compete with greater waste prevention, re-use, or recycling, or result in over-capacity of EfW or similar processes for the treatment of waste at a national or local level.</u></p> <p data-bbox="539 1169 1016 1422">Where possible, applicants are encouraged to source materials from recycled or reused sources and use low carbon materials, sustainable sources and local suppliers. Construction best practices should be used to</p>	<p data-bbox="1043 284 1641 392">Agreement with CCC. The Applicant will provide status updates on these discussions during the Examination.</p> <p data-bbox="1043 464 1641 719">ES Chapter 3: Description of the Proposed Development (Volume 6.2) [APP-030] confirms that the Applicant has committed to achieving a minimum BREEAM rating of ‘Good’ for the EfW CHP Facility and ‘Excellent’ for the Administration Building.</p> <p data-bbox="1043 762 1641 1126">The same chapters also confirms that the Applicant has designed the layout of the EfW CHP Facility Site to make best use of topography and aims to achieve a cut and fill balance where practicable to minimise removal of materials. Materials arising from demolition and excavation activities would be re-used on site where practicable including for example backfill for landscaping.</p> <p data-bbox="1043 1169 1641 1385">Construction materials will be stored such that they are protected and do not give rise to environmental effects resulting from their storage. The management of construction materials is described within the Outline Construction Environmental</p>	<p data-bbox="1671 464 1998 683">ES Chapter 3: Description of the Proposed Development (Volume 6.2) [APP-030]</p> <p data-bbox="1671 726 1998 906">Outline Construction Environmental Management Plan (Volume 6.2) [REP1-024]</p>



NPS Para No.	Relevant Requirement of the National NPS	Scheme compliance with the National NPS	Examination document
	<p>ensure that material is reused or recycled onsite where possible.</p> <p>Applicants are encouraged to use construction best practices in relation to storing materials in an adequate and protected place on site to prevent waste, for example, from damage or vandalism.</p>	<p>Management Plan (Volume 6.2) [REP1-024].</p> <p>The Applicant's commitment to delivering the design commitments and management of construction materials are secured by Draft DCO Requirements 2 and 19 (Volume 3.1) [REP1-007] respectively.</p> <p>DEFRA's waste management policy is set out in the following key documents:</p> <ul style="list-style-type: none"> • The Waste Management Plan for England (January 2021); and • The Resources and Waste Strategy 'Our Waste, Our Resources: A Strategy for England' (2018). <p>Together, these documents set out the Government's strategy to move toward a circular economy and hit its net zero emissions targets in line with its 25 Year Environment Plan. Greater efficiency of energy from waste facilities is recognised as of high importance in the Government's Waste Management Plan, with an aim of ensuring that all future energy from waste plants achieve recovery (R1) status by producing heat for heat networks. This reduces emissions significantly by making</p>	



NPS Para No.	Relevant Requirement of the National NPS	Scheme compliance with the National NPS	Examination document
		<p>use of otherwise wasted heat to displace gas boiler heating.</p> <p>The Applicant has prepared an updated Waste Fuel Availability Assessment (Volume 7.3) [REP2-009] submitted at Deadline 2. This considers the availability of fuel (residual waste) at a local and national level and demonstrates that there is sufficient waste, currently landfilled, to support the facility. Using residual waste only, the Proposed Development will not compete with government policy to encourage greater re-use or recycling.</p>	
<p>Revised Draft NPS EN-1: 5.16.5 – 5.16.6, 5.16.7</p>	<p><u>Water Quality and Resources</u></p> <p><u>Applicant Assessment</u></p> <p>Where possible, applicants are encouraged to manage surface water during construction by treating surface water runoff from exposed topsoil prior to discharging and to limit the discharge of suspended solids.</p> <p>Applicants are encouraged to consider protective measures to control the risk of pollution to groundwater beyond those outlined in River Basin</p>	<p>The Applicant has set out measures to protect surface water during construction both within ES Chapter 12: Hydrology (Volume 6.2) [APP-039] and within the Outline Construction Environmental Management Plan (Volume 7.12) [REP1-024]. Outline CEMP, Appendix B Outline Water Management Plan Section 3.3 sets out the measures to be taken to protect watercourses.</p> <p>The Applicant's commitment to the management of surface water and protection of ground water during construction are secured by Draft DCO</p>	<p>ES Chapter 12: Hydrology (Volume 6.2) [APP-039]</p> <p>Outline Construction Environmental Management Plan (Volume 7.12) [REP1-024]</p>



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	<p>Management Plans and Groundwater Protection Zones - this could include, for example, the use of protective barriers.</p> <p>Consideration of climate change is required.</p>	<p>Requirements 10 and 9 (Volume 3.1) [REP1-007] respectively.</p> <p>The proposed mitigation measures take into account appropriate allowances for climate change.</p>	

Table 2.2 Compliance with National Policy Statement EN-3 and Revised Draft EN-3

NPS Para No.	Relevant Requirement of the National Networks NPS	Scheme compliance with the National Networks NPS	Examination document
NPS EN-3: 2.5.33 – 2.5.34	<p>Impact Assessment Principles – National designations</p> <p>In sites with nationally recognised designations (Sites of Special Scientific Interest, National Nature Reserves, National Parks, the Broads, Areas of Outstanding Natural Beauty and Registered Parks and Gardens), the SoS must only grant consent for renewable energy projects where it can be demonstrated by the Applicant that the objectives of designation of the area will not be compromised and any significant</p>	<p>ES Chapter 9: Landscape and Visual (Volume 6.2) [APP-036], ES Chapter 10: Historic Environment (Volume 6.2) [APP-037] and ES Chapter 11: Biodiversity (Volume 6.2) [APP-038] contain, respectively, assessments of the impact of the Proposed Development on nationally designated sites and assets for landscape, heritage and nature conservation. No significant adverse effects have been identified.</p>	<p>ES Chapter 9: (Volume 6.2) [APP-036] ES Chapter 10: (Volume 6.2) [APP-037] ES Chapter 11: (Volume 6.2) [APP-038]</p>



NPS Para No.	Relevant Requirement of the National Networks NPS	Scheme compliance with the National Networks NPS	National Examination document
	<p>adverse effects on the qualities for which the area has been designated are clearly outweighed by the environmental, social and economic benefits of the proposed development.</p> <p>In considering the impact on the historic environment, the SoS should take into account the positive role that large-scale renewable projects play in the mitigation of climate change, the delivery of energy security and the urgency of meeting the national targets for renewable energy supply and emissions reductions.</p>		
NPS EN-3: 2.5.36	<p>Impact Assessment Principles – Other locational considerations</p> <p>As most renewable energy resources can only be developed where the resource exists and where economically feasible, the SoS should not use a sequential approach in the consideration of renewable energy projects.</p>	<p>Section 2.3 ES Chapter 2: Alternatives (Volume 6.2) [APP-029] explains the essential and preferable criteria which the Applicant applied when selecting the EfW CHP Facility Site.</p>	<p>ES Chapter 2: Alternatives (Volume 6.2) [APP-029]</p>



NPS Para No.	Relevant Requirement of the National Networks NPS	Scheme compliance with the National Networks NPS	Examination document
NPS EN-3: 2.5.37 – 2.5.45	<p data-bbox="535 285 1016 352">Biomass/Waste Impacts – Air quality and emissions</p> <p data-bbox="535 397 1016 427"><u>Applicant's Assessment</u></p> <p data-bbox="535 435 1016 612">The ES should include an assessment of air emissions and demonstrate compliance with the Waste Incineration Directive (WID).</p> <p data-bbox="535 657 1016 799">Abatement technologies should be those set out in the relevant sector guidance notes as produced by the EA.</p> <p data-bbox="535 844 1016 874"><u>Decision Making</u></p> <p data-bbox="535 882 1016 1091">The SoS should not regard a proposal as having an adverse impact on health if the requirements of WID are met and local air quality standards are not exceeded.</p> <p data-bbox="535 1136 1016 1241">The SoS does not need to consider equipment selection in its determination process.</p>	<p data-bbox="1043 285 1749 427">The Applicant's air quality assessment is set out in ES Chapter 8: Air Quality (Volume 6.2) [APP-035], accompanied by a Human Health Risk Assessment, Annex G (Volume 6.4) [APP-078]. Reference is made to the WID in Table 8.2 'Planning policy context for Air Quality: Adopted National Policy Statements'. This states that Sections 8.6-8.10 of the assessment consider emissions to air from the chimneys at the respective emission limit values (ELVs) in Annex VI of the IED (WID was incorporated into this Directive in 2010) with an assessment of resulting ground level concentrations and associated impacts on human health made against relevant air quality standards, objectives and guideline values. The assessment concludes that emissions would comply with WID. Emissions would not lead to significant effects upon sensitive Receptors.</p> <p data-bbox="1043 991 1749 1315">The Proposed Development will require an Environmental Permit. The Applicant applied to the Environment Agency for an Environmental Permit for the EfW CHP Facility on the 5 August 2022. The application reference is EPR/HP3441QA/A001. On 13 April 2023 the Environment Agency informed the Applicant that the application would be recorded as being duly made.</p>	<p data-bbox="1776 285 1998 427">ES Chapter 8: Air Quality (Volume 6.2) [APP-035]</p>



NPS Para No.	Relevant Requirement of the National Networks NPS	Scheme compliance with the National Networks NPS	Examination document
NPS EN-3: 2.5.46 - 2.5.52	<p data-bbox="535 285 1016 352">Biomass/Waste Impacts – Landscape and visual</p> <p data-bbox="535 397 1016 427"><u>Applicant's Assessment</u></p> <p data-bbox="535 435 1016 576">A landscape and visual impact assessment should be undertaken in accordance with Section 5.9 of EN-1.</p> <p data-bbox="535 620 1016 651"><u>Decision Making</u></p> <p data-bbox="535 695 1016 1206">Any biomass/waste combustion generating station will require a building able to host fuel reception and storage facilities, the combustion chamber and abatement units. The overall size of the building will be dependent on design and fuel throughput, although it is unlikely to be less than 25m in height. External to the building there may be cooling towers, the size of which will also be dependent on the throughput of the generating station.</p> <p data-bbox="535 1251 1016 1390">Mitigation is achieved primarily through aesthetic aspects of site layout and building design including size and external finish</p>	<p data-bbox="1043 285 1744 392">The Applicant's Landscape and Visual Assessment is reported in ES Chapter 9: Landscape and Visual (Volume 6.2) [APP-036].</p> <p data-bbox="1043 435 1744 759">The scale, height and mass of the proposed EfW CHP Facility has been dictated by its operational requirements and the some of the buildings are greater than 25m in height. The Proposed Development does not include for cooling towers but for an air cooled condenser which would be 27m in height (maximum height parameter of 30m) and located on the eastern boundary of the EfW CHP Facility Site.</p> <p data-bbox="1043 802 1744 1126">The Applicant's approach to design is set out within ES Chapter 2: Alternatives (Volume 6.2) [APP-029] and within the Design and Access Statement (Volume 7.5) [APP-096]. This explains the consideration given to different building finishes in terms of material, colour and texture and explains the context provided by existing buildings which surround the EfW CHP Facility Site.</p> <p data-bbox="1043 1169 1744 1355">The Applicant's commitment to delivering the design commitments and management of construction materials are secured by Draft DCO Requirements 2 and 19 (Volume 3.1) [REP1-007] respectively.</p>	<p data-bbox="1771 285 2002 464">ES Chapter 9: Landscape and Visual (Volume 6.2) [APP-036]</p> <p data-bbox="1771 507 2002 647">ES Chapter 2: Alternatives (Volume 6.2) [APP-029]</p> <p data-bbox="1771 691 2002 869">Design and Access Statement (Volume 7.5) [APP-096]</p> <p data-bbox="1771 912 2002 1126">ES Chapter 3 Description of the Proposed Development (Volume 6.3) [APP-049]</p> <p data-bbox="1771 1169 2002 1278">Draft DCO (Volume 3.1) [REP1-007]</p>



NPS Para No.	Relevant Requirement of the National Networks NPS	Scheme compliance with the National Networks NPS	Examination document
	<p>and colour of the generating station to minimise intrusive appearance in the landscape as far as engineering requirements permit. The precise architectural treatment will need to be site-specific.</p> <p>Generating stations are expected to provide sufficient landscaping to visually screen them at low level from surrounding external viewpoints.</p>	<p>The Applicant's proposals for landscaping are set out within the as Figure 3.14 to ES Chapter 3: Description of the Proposed Development (Volume 6.3) [APP-049]. This proposes to introduce landscaping to the EfW CHP Facility frontage to New Bridge Lane which would provide a landscape using native species common in the surrounding area and which includes tree planting to screen the buildings from low level.</p> <p>The Applicant's commitment to deliver biodiversity, landscape and ecological mitigation are secure by Draft DCO Requirements 4, 5 and 6 (Volume 3.1) [APP-013].</p>	
<p>NPS EN-3: 2.5.53 - 2.5.58</p>	<p><u>Biomass/Waste Impacts - Noise and vibration</u></p> <p><u>Applicant's Assessment</u></p> <p>The impacts of noise and vibration arising from a proposed development on amenity should be assessed in accordance with Section 5.11 of NPS EN-1. The assessment should demonstrate that noise impacts can be adequately mitigated through requirements.</p> <p><u>Decision Making</u></p>	<p>The Applicant has undertaken a noise and vibration assessment and this is reported within ES Chapter 7: Noise and Vibration (Volume 6.2) [APP-034].</p> <p>The assessment approach to the consideration of impacts upon amenity has been undertaken in accordance with Section 5.11 of NPS EN-1 with potential impacts mitigated. Many mitigation measures are embedded into the design of the Proposed Development. Those subject to requirements are identified within Table 7.40 Summary of indicative environmental measures to be implemented – relating to noise and vibration.</p>	<p>ES Chapter 7: Noise and Vibration (Volume 6.2) [APP-034]</p>



NPS Para No.	Relevant Requirement of the National Networks NPS	Scheme compliance with the National Networks NPS	Examination document
NPS EN-3: 2.5.59 - 2.5.63	<p data-bbox="535 285 1016 464">Development consent should not be granted unless the SoS is confident that the proposals meet the aims set out in paragraph 5.11.9 of NPS EN-1.</p> <p data-bbox="535 647 1016 751">Biomass/Waste Impacts – Odour, insect and vermin infestation</p> <p data-bbox="535 799 875 828"><u>Applicant's Assessment</u></p> <p data-bbox="535 836 1016 1051">The applicant should assess the potential for insect infestation and emissions of odour as set out in NPS EN-1 Section 5.6 with particular regard to the handling and storage of waste for fuel.</p> <p data-bbox="535 1099 1016 1275">In EfW generating stations, the reception, storage and handling of waste should be carried out within defined areas and within enclosed buildings.</p> <p data-bbox="535 1323 770 1351"><u>Decision Making</u></p> <p data-bbox="535 1359 1016 1422">The SoS should satisfy themselves that the proposed</p>	<p data-bbox="1043 285 1744 389">Compliance with NPS EN-1 paragraph 5.11.9 is established in the consideration of the application under NPS EN-1 above.</p> <p data-bbox="1043 437 1744 580">The Applicant's commitments to deliver noise mitigation and monitoring are secured by Requirement 19 of the Draft DCO (Volume 3.1) [REP1-007].</p> <p data-bbox="1043 647 1744 828">The Applicant has considered the potential for insect infestation. ES Chapter 3: Description of the Proposed Development (Volume 6.2) [APP-030] paragraph 3.5.47 sets out the measures to monitor and control pests.</p> <p data-bbox="1043 876 1744 1163">The design measures to address emissions of odour are set out within the same chapter at paragraph 3.4.6 whilst the Applicant has also prepared an Outline Odour Management Plan (Volume 7.11) [REP1-021]. The detailed Odour Management Plan is secured by Draft DCO Requirement 16 of the Draft DCO (Volume 3.1) [REP1-007].</p> <p data-bbox="1043 1211 1744 1386">The Proposed Development includes for an enclosed reception, storage and handling area for waste. ES Chapter 3: Description of the Proposed Development (Volume 6.2) [APP-030] confirms that the Tipping Hall would be fully</p>	<p data-bbox="1771 647 1998 863">ES Chapter 3: Description of the Proposed Development (Volume 6.2) [APP-030]</p> <p data-bbox="1771 911 1998 1091">Outline Odour Management Plan (Volume 7.11) [REP1-021]</p> <p data-bbox="1771 1139 1998 1235">Draft DCO (Volume 3.1) [REP1-007]</p>



NPS Para No.	Relevant Requirement of the National Networks NPS	Scheme compliance with the National Networks NPS	Examination document
	development includes appropriate measures to minimise impacts on local amenity from odour, insect and vermin infestation.	enclosed within the main building with negative internal pressure maintained to control odour.	
NPS EN-3: 2.5.64 - 2.5.70	<p data-bbox="535 464 1016 531">Biomass/Waste Impacts - Waste management</p> <p data-bbox="535 576 1016 608"><u>Applicant's Assessment</u></p> <p data-bbox="535 616 1016 938">An assessment should examine the conformity of the proposed development with the waste hierarchy and set out the effect of the scheme on the relevant waste plan and the extent to which the generating station contributes to the recovery targets in relevant strategies and plans.</p> <p data-bbox="535 1023 1016 1054"><u>Decision Making</u></p> <p data-bbox="535 1062 1016 1310">The SoS should be satisfied that the proposed waste generating station is in accordance with the waste hierarchy and will not prejudice the achievement of local or national waste management targets.</p>	<p data-bbox="1043 464 1581 831">The Proposed Development would only use residual waste as a fuel source. This is waste that would otherwise be landfilled. EfW moves waste up the waste hierarchy and away from landfill. The Applicant has prepared a Waste Fuel Availability Assessment (Volume 7.3) [REP2-009]. This considers the availability of fuel (residual waste) at a local and national level and demonstrates that there is sufficient waste, currently landfilled, to support the facility.</p> <p data-bbox="1043 871 1581 1015">The Applicant's commitments to demonstrate compliance with the waste hierarchy are secured by Requirement 14 of the Draft DCO (Volume 3.1) [REP1-007].</p>	<p data-bbox="1776 464 1966 647">Waste Fuel Availability Assessment (Volume 7.3) [REP2 -009]</p> <p data-bbox="1776 687 1966 791">Draft DCO (Volume 3.1) [REP1-007]</p>
NPS EN-3: 2.5.71 - 2.5.83	Biomass/Waste Impacts - Residue management	The EfW CHP Facility treatment process creates two principal types of waste; Incinerator Bottom	ES Chapter 3: Description of



NPS Para No.	Relevant Requirement of the National Networks NPS	Scheme compliance with the National Networks NPS	Examination document
	<p><u>Applicant's Assessment</u> The ES should include details of the production and disposal of residues and consider the capacity of existing waste management sites for dealing with residues over the planned life of the power station.</p> <p><u>Decision Making</u> The SoS should be satisfied that management plans for residue disposal minimise the amount of waste that cannot be used for commercial purposes.</p>	<p>Ash (IBA) and Air Pollution Control residues (APCr). ES Chapter 3: Description of the Proposed Development (Volume 6.2) [APP-030] describes the production and management of the IBA and APCr at the EfW CHP Facility. 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. Appendix 10.2B Technical Note – IBA and APCr Sites and Capacity of the Applicant's response to the ExA's Written Questions (ExQ1) (Volume 10.2) [REP2-029] provides information on the potential licenced facilities for IBA and APCr.</p>	<p>the Proposed Development (Volume 6.2) [APP-030]</p>
<p>NPS EN-3: 2.5.84 - 2.5.87</p>	<p><u>Biomass/Waste Impacts – Water quality and resources</u></p> <p><u>Applicant's Assessment</u> The applicant should assess the potential effects of the proposed development on water quality and resources in accordance with NPS EN-1 (Section 5.15) and seek to demonstrate that appropriate measures will be put in place to avoid or minimise</p>	<p>The Applicant has undertaken an assessment of the effects arising from the Proposed Development upon water, including water quality and resources within ES Chapter 12: Hydrology (Volume 6.2) [APP-039].</p> <p>The baseline conditions are established within Section 12.5 with water resources considered in paragraphs 12.5.29 to 12.5.33 and water quality in paragraphs 12.5.34 to 12.5.38. There is one licenced non-public surface water abstraction within the Study Area. Water quality effects during</p>	<p>ES Chapter 12: Hydrology (Volume 6.2) [APP-039]</p> <p>Outline Construction Environmental Management Plan (Volume 7.12) [REP1-024]</p>



NPS Para No.	Relevant Requirement of the National Networks NPS	Scheme compliance with the National Networks NPS	Examination document
	<p>adverse impacts of abstraction and discharge of cooling water.</p> <p><u>Decision Making</u> The SoS should be satisfied that the applicant has demonstrated measures to minimise adverse impacts on water quality and resources as described above and in NPS EN-1.</p>	<p>construction on statutory nature conservation sites are scoped from the assessment due to the distance from the Proposed Development together with the embedded mitigation measures proposed.</p> <p>The assessment also considers affects upon water bodies protected under the WFD.</p> <p>The assessment conclusions are set out in Table 12.19 Summary of significance of adverse effects. It concludes that effects upon aquatic environment Receptors resulting from all hydrological effects to include water quality and water resources would not be significant during construction and operation. Other water resource Receptors (e.g., Anglian water resources) will also not be significantly affected.</p> <p>Effects upon water quality, for example as a result of sediment laden runoff with embedded mitigation in place would not be significant. Mitigations include for the Materials Management Plan which forms an appendix to the Outline Construction Environmental Management Plan (Volume 7.12) [REP1-024].</p> <p>The Applicant's commitment to the management of surface water and protection of ground water</p>	<p>Draft DCO (Volume 3.1) [REP1-007]</p>



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Revised Draft NPS EN-3: 3.7.6 – 3.7.7, 3.7.9, 3.7.17, 3.7.43 - 3.7.47	Biomass and Waste Combustion	are secured by Draft DCO Requirements 8, 9 and 10 (Volume 3.1) [REP1-007] respectively.	Waste Fuel Availability Assessment (Volume 7.3) [REP2-009]
	<u>Applicant Assessment</u>	DEFRA's waste management policy is set out in the following key documents: <ul style="list-style-type: none"> • The Waste Management Plan for England (January 2021); and • The Resources and Waste Strategy 'Our Waste, Our Resources: A Strategy for England' (2018). 	Technical Note: R1 (Volume 9.25) [REP1-058]
<p>Applicants must demonstrate that proposed EfW plants are in line with the Department for Environment, Food & Rural Affairs' (Defra) policy position on the role of energy from waste in treating municipal waste from municipal or commercial and industrial sources.</p>	<p>Together, these documents set out the Government's strategy to move toward a circular economy and hit its net zero emissions targets in line with its 25 Year Environment Plan. Greater efficiency of energy from waste facilities is recognised as of high importance in the Government's Waste Management Plan, with an aim of ensuring that all future energy from waste plants achieve recovery (R1) status by producing heat for heat networks. This reduces emissions significantly by making use of otherwise wasted heat to displace gas boiler heating.</p>	Carbon Capture and Export Readiness Reserve Space Plan (Volume 10.7) [REP2-024]	
<p>The proposed plant must not compete with greater waste prevention, re-use, or recycling, or result in over-capacity of EfW treatment at a national or local level.</p>	<p>The R1 calculation is certified by the Environment Agency. To be classified as a recovery operation the R1 value must exceed 0.65. Using the Environment Agency's guidance note (Waste</p>	Draft DCO (Volume 3.1) [REP1-007].	
<p>Government policy encourages multi-modal transport and it is expected that applicants will transport materials (fuel and residues) by water or rail routes</p>		Applicant's comments on Deadline 2	



NPS Para No.	Relevant Requirement of the National Networks NPS	Scheme compliance with the National Networks NPS	Examination document
	<p>where possible, with road transport expected where this is not feasible or for shorter journeys.</p> <p>Carbon capture readiness - CCR is relevant to proposed biomass plant at or over 300MW of generating capacity, but not to EfW plants. It is noted that a separate consultation on new proposals for Decarbonisation Readiness is running in parallel to the consultation on the Revised Draft NPS EN-3 and the NPS may be updated as a consequence.</p>	<p>incineration plant: apply for R1 status (Aug 2021)) the Applicant has calculated the EfW CHP Facility's R1 value. At 0.81 the R1 value for the EfW CHP Facility far exceeds the 0.65 threshold to be classified as a recovery operation. The Applicant's R1 calculation is provided in the Technical Note: R1 (Volume 9.24) [REP1-048] submitted at Deadline 1.</p> <p>The Proposed Development fully complies with the provisions of DEFRA policy in that it would have R1 status and has been designed to recovery both heat and power from residual household, industrial and commercial waste.</p> <p>The Applicant has prepared an updated Waste Fuel Availability Assessment (Volume 7.3) [REP2-009] submitted at Deadline 2. This considers the availability of fuel (residual waste) at a local and national level and demonstrates that there is sufficient waste, currently landfilled, to support the facility. Using residual waste only, the Proposed Development will not compete with government policy to encourage greater re-use or recycling.</p> <p>Water-borne and rail transport is not currently available for the Proposed Development although the Applicant configured the EfW CHP Facility Site to accommodate a future railway siding and bridge</p>	<p>submissions) (Volume 11.5)</p>



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		<p>embankment should the disused March to Wisbech Railway re-open and transport of waste by railway be viable in the future.</p> <p>The Applicant notes that the draft government policy currently explicitly excludes EfW at or over 300MW from a requirement to be carbon capture ready. However, it is noted that this may change as a result of a separate consultation on new proposals for Decarbonisation Readiness. Whilst the Proposed Development would not generate 300MW and is an EfW CHP facility, the Applicant has nevertheless reserved land for carbon capture and export plant and is committed to investigating opportunities to deliver carbon capture and export through Requirements 22 and 23 in the Draft DCO (Volume 3.1) [REP1-007]. The Applicant has provided more information on their CCR position in response to CCC's D1 submissions (see ID CC50 in the Applicant's comments on Deadline 2 submissions) (Volume 11.5) submitted at Deadline 3.</p>	



Table 2.3 Compliance with National Policy Statement EN-5 and Revised Draft EN-5

NPS Para No.	Relevant Requirement of the National Networks NPS	Scheme compliance with the National Networks NPS	Examination document
NPS EN-5: 2.4.1 - 2.4.2	<p>Climate Change Adaptation</p> <p>Applications for electricity networks infrastructure should set out how the proposed development would be resilient to: the potential effects of flooding (particularly for substations that are vital for the electricity and distribution network); higher average temperatures leading to increased transmission losses and earth movement; or subsidence caused by flooding or drought.</p>	<p>ES Chapter 14: Climate (Volume 6.2) [APP-041] includes an assessment of the projected impacts of climate change on the Proposed Development during construction, operation and decommissioning. This assessment of climate change resilience is based on UK Climate Projections 18 produced by the Met Office and draws on data from the Third Climate Change Risk Assessment published by the UK Government in January 2022⁵ and the latest evidence prepared by the Adaptation Committee presented in the Independent Assessment of UK Climate Risk 2021⁶.</p> <p>The assessment takes account of the design measures built into the Proposed Development to ensure climate resilience. These measures include:</p> <ul style="list-style-type: none"> • design of Proposed Development to be resilient to current weather impacts; • implementation of a flexible construction programme to integrate extreme weather-related delays and allow flexibility of timings of critical activities; 	<p>ES Chapter 12: Hydrology (Volume 6.2) [APP-039]</p> <p>ES Chapter 12: Hydrology Appendix 12A (Volume 6.4) [APP-084]</p> <p>ES Chapter 14: Climate (Volume 6.2) [APP-041]</p> <p>Planning Statement (Volume 7.1) [APP-091].</p>

⁵ UK Government. UK Climate Change Risk Assessment 2022.

⁶ Betts, R.A. and Brown, K, (2021). Introduction. In: *The Third UK Climate Change Risk Assessment Technical Report* [Betts, R.A., Haward, A.B. and Pearson, K.V.(eds.)]. Prepared for the Climate Change Committee, London.



NPS Para No.	Relevant Requirement of the National Networks NPS	Scheme compliance with the National Networks NPS	Examination document
		<ul style="list-style-type: none"> • a requirement for contractors to sign up for short to medium range weather forecasting alerts; • installation of lightning protection systems where required; • design of Proposed Development to give consideration to climate change adaptation in line with relevant standards and future climate; • measures to reduce the impact of extreme weather on construction; • design of the drainage systems to include consideration for resilience to climate change; • protection of the waste bunker against groundwater ingress and uplift; • use of climate suitable species in landscape planting; and • reduction in the reliance on potable water to be implemented e.g., rainwater harvesting. <p data-bbox="1050 1118 1733 1257">On the basis of the measures embedded into the design of the Proposed Development, the climate change resilience assessment concludes that there would be no significant effects.</p> <p data-bbox="1050 1300 1733 1406">The effects of climate change are additionally considered (as appropriate) in other ES environmental topic chapters. This includes the</p>	



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		<p>assessment of hydrological impacts in ES Chapter 12: Hydrology (Volume 6.2) [APP-039] which has been informed by an FRA (Appendix 12A: FRA (Volume 6.4) [APP-084]). The findings of the hydrological assessment including FRA are summarised in Section 4.9 of the Planning Statement (Volume 7.1) [APP-091].</p>	
NPS EN-5: 2.5.1 - 2.5.2	<p>Consideration of good design</p> <p>Proposals should demonstrate good design.</p>	<p>A Design and Access Statement (Volume 7.5) [APP-096] has been provided as part of the DCO Application. This details how the design of the Proposed Development has evolved and demonstrates that all aspects of site selection, site access and future access requirements have been addressed and incorporated into the proposed design and that measures have been embedded to mitigate the adverse impacts of the Proposed Development. It explains the options considered in respect of (<i>inter alia</i>) massing, roof profiles and architectural design.</p> <p>The Design and Access Statement (Volume 7.5) [APP-096] confirms that the Applicant is committing to achieving a high sustainability standard by choosing to implement a Building Research Establishment Environmental Assessment Method (BREEAM) scoring system</p>	<p>Design and Access Statement (Volume 7.5) [APP-096]</p> <p>ES Chapter 2: Alternatives (Volume 6.2) [APP-029]</p> <p>Draft DCO (Volume 3.1) [REP1-007]</p>



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		<p>for the development The EfW CHP Facility will be constructed to achieve a minimum BREEAM rating of 'Good', except for the administration building where the minimum rating will be 'Excellent'.</p> <p>The Applicant's commitment to delivering the design commitments are secured by Draft DCO Requirement 2 (Volume 3.1) [REP1-007].</p> <p>As highlighted above, Chapter 2: Alternatives (Volume 6.2) [APP-029] of the ES also includes a description of the main alternatives considered by the Applicant and the reasons for selecting the preferred options for the Proposed Development.</p>	
NPS EN-5: 2.7.1 – 2.7.6	<p>Biodiversity and Geological Conservation</p> <p>The applicant will need to consider whether the proposed development will cause impacts on biodiversity at any point along its length and take this into consideration in the ES.</p>	<p>The Applicant has sought to reduce effects upon biodiversity by amending the initial designs for the Grid Connection such that it is now a 4.8km underground connection as opposed to earlier iterations of 11km or greater. The iterative approach to the design is described within ES Chapter 2: Alternatives Appendix 2A Grid Connection Options Report (Volume 6.4) [APP-069]. This also describes the environmental considerations, including biodiversity that influenced the design choices made. The resulting Grid Connection which forms part of the Proposed Development has been</p>	<p>ES Chapter 2: Alternatives Appendix 2A Grid Connection Options Report (Volume 6.4) [APP-069]</p> <p>ES Chapter 11: Biodiversity (Volume 6.2) [APP-038]</p>



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		<p>assessed for its effects upon biodiversity within ES Chapter 11: Biodiversity (Volume 6.2) [APP-038]. It concludes that there would be no significant effects as a result of the Proposed Development (including Grid Connection).</p> <p>The Applicant's commitment to deliver biodiversity, net gain is secure by Draft DCO Requirement 6 (Volume 3.1) [REP1-007].</p>	<p>Draft DCO (Volume 3.1) [REP1-007]</p>
<p>NPS EN-5: 2.8.1 - 2.8.11</p>	<p>Landscape and Visual</p> <p>The ES should consider generic landscape impacts and should also provide details of how consideration has been given to undergrounding as a way of mitigating impacts.</p>	<p>The Applicant's Landscape and Visual Assessment is reported in ES Chapter 9 Landscape and Visual (Volume 6.2) [APP-036] which considers amongst other Receptor groups, the potential for effects upon landscape components and landscape character. The Applicant's approach to undergrounding and the rationale for the designs that it has made are set out within the iterative approach to the design is described within ES Chapter 2: Alternatives Appendix 2A Grid Connection Options Report (Volume 6.4) [APP-069]. This document concludes with a Grid Connection that is wholly underground.</p>	<p>ES Chapter 9: Landscape and Visual (Volume 6.2) [APP-036]</p> <p>ES Chapter 2: Alternatives Appendix 2A Grid Connection Options Report (Volume 6.4) [APP-069]</p>
<p>NPS EN-5: 2.10.1 - 2.10.16</p>	<p>Electric and Magnetic Fields (EMFs)</p>	<p>The Applicant's consideration of EMF is set out within ES Chapter 16: Health (Volume 6.2) [APP-043] at paragraphs 16.9.63 to 16.9.71.</p>	<p>ES Chapter 16 Health: (Volume 6.2) [APP-043]</p>



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Revised Draft NPS EN-5: 2.5.1	<p data-bbox="539 687 1025 754">Environmental and Biodiversity Net Gain</p> <p data-bbox="539 799 1025 1198">When planning and evaluating the proposed development's contribution to environmental and BNG, it will be important for both the applicant and the SoS to supplement the generic guidance set out in NPS EN-1 (Section 4.5) with recognition that the linear nature of electricity networks infrastructure allows opportunities to:</p> <ul style="list-style-type: none"> <li data-bbox="573 1206 1025 1385">i. reconnect important habitats via green corridors, biodiversity stepping zones, and re-establishment of 	<p data-bbox="1050 288 1738 616">It concludes that the placement of the Grid Connection underground would eliminate the electric field whilst the magnetic field that would still be produced would avoid sensitive Receptors due to the cable placement within the highway or highway verge. The Walsoken Substation would be securely fenced to prevent access other than by authorised persons. Effects are concluded as being not significant.</p> <p data-bbox="1050 687 1738 1385">The Applicant has undertaken a biodiversity net gain calculation using the current methodology and is committed via the ES Chapter 11: Biodiversity Appendix 11M Biodiversity Net Gain Rev 2 (Volume 6.4) document submitted at Deadline 3 to delivering 10% net gain as a result of the Proposed Development through a combination of onsite and offsite measures. The Applicant is in discussion with organisations to deliver net gain and this is likely to include for improvements to or the creation of linear habitats. Because the Grid Connection would be underground within the highway and highway verge there are no opportunities to reconnect habitats. However, where the connection crosses informal footpath routes (PRoWs are terminated at the point that they reach the A47 highway verge) the Applicant will reinstate to the current condition.</p>	<p data-bbox="1762 687 1998 975">ES Chapter 11: Biodiversity Appendix 11M Biodiversity Net Gain Rev 3 (Volume 6.4) submitted at Deadline 3</p>



NPS Para No.	Relevant Requirement of the National Networks NPS	Scheme compliance with the National Networks NPS	Examination document
	<p>appropriate hedgerows; and/or</p> <p>ii. connect people to the environment, for instance via footpaths and cycleways constructed in tandem with biodiversity enhancements.</p>		
<p>Revised Draft NPS EN-5: 2.9.18 – 2.9.19; 2.11.2 –</p>	<p>Landscape and Visual</p> <p><u>Applicant Assessment</u> The Horlock Rules should be embodied in applicants' proposals.</p> <p><u>Decision Making</u> The SoS should be satisfied that the development, so far as is reasonably possible, complies with the Horlock Rules or any updates to them. The SoS should also be satisfied that all pertinent options for mitigation have been considered and evaluated appropriately.</p>	<p>The Horlock Rules have been used to inform the siting of the Applicant's Walsoken Substation in that:</p> <p>Environmental issues have been considered at the earliest stage balanced with technical and capital cost requirements (see ES Chapter 2: Alternatives Appendix 2A Grid Connection Options Report (Volume 6.4) [APP-069]).</p> <p>Internally and nationally designated sites are avoided.</p> <p>Areas of local amenity value, important landscapes and habitats, hedgerows and watercourse are avoided – the site is on UKPN land immediately adjacent to the existing substation.</p> <p>Screening will be provided by maintaining existing vegetation where possible and by planting new.</p>	<p>ES Chapter 2: Alternatives Appendix 2A Grid Connection Options Report (Volume 6.4) [APP-069]</p>



NPS Para No.	Relevant Requirement of the National Networks NPS	Scheme compliance with the National Networks NPS	Examination document
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Visual, noise and other environmental effects will be minimised through design and the placement of the substation adjacent to an existing substation.

Land uses will not be affected – the land is owned by UKPN and forms a landscaped area to the front of its substation. UKPN has agreed to its use.

Where optionality is available the Applicant has chosen to use equipment with the lowest environmental effects (e.g., clean air switchgear avoiding the use of SF6).

The Proposed Substation would not affect public rights of way.

Access would be via an existing private access road with existing planting maintained where possible.

The location is not an 'open landscape'. There will be no high voltage lines and the Applicant's Walsoken Substation will be located and 'set against' the context of the existing UKPN substation.



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<p>Revised Draft NPS EN-5: 2.10.8, 12.10.14, 2.11.16</p>	<p><u>Mitigation</u></p> <p>A management plan, developed at least in outline at the conclusion of the examination, should secure the integrity and benefit of landscape schemes and uphold the landscape commitments made to achieve consent, alongside any pertinent commitments to environmental and BNG.</p> <p>Applicants should avoid the use of Sulphur Hexafluoride (SF6) in new developments.</p> <p>Decision Making</p> <p>The SoS should grant consent for an electricity networks development only if the applicant has demonstrated either that i) the development will not use SF6; or ii(a)) that there is no proven commercially available alternative to the use of SF6, and ii(b)) that a bespoke SF6-free alternative would be grossly disproportionate in terms of cost, and ii(c)) that emissions monitoring and control</p>	<p>The Proposed Development includes an Outline Landscape and Ecology Management Plan (Volume 7.7) Rev 2 submitted at Deadline 3 and secured in Requirement 5 of the Draft DCO (Volume 3.1) [REP1-007]. The BNG strategy Rev 3 (Volume 6.4) submitted at Deadline 3 is secured in Requirement 6 of the Draft DCO (Volume 3.1) [REP1-007].</p> <p>The Applicant has chosen to use equipment with the lowest environmental effects and as such it will use clean air switchgear avoiding the use of SF6. This is confirmed within ES Chapter 2: Alternatives Appendix 2A Grid Connection Options Report (Volume 6.4) [APP-069] and ES Chapter 3 Description of the Proposed Development (Volume 6.2) [APP-030] (paragraph 3.6.11).</p>	<p>ES Chapter 2: Alternatives Appendix 2A Grid Connection Options Report (Volume 6.4) [APP-069]</p> <p>ES Chapter 3: Description of the Proposed Development (Volume 6.2) [APP-030]</p> <p>Draft DCO (Volume 3.1) [REP1-007].</p> <p>ES Chapter 11: Biodiversity Appendix 11M Biodiversity Net Gain - Rev 3 (Volume 6.4) submitted at Deadline 3.</p>



NPS Para No.	Relevant Requirement of the National Networks NPS	Scheme compliance with the National Networks NPS	with the	National Examination document
	measures compliant with the F-gas Regulation and/or its successors are in place			



3. Conclusion

- 3.1.1 This revision of the NPS Tracker (Revision 2) has been updated and submitted at Deadline 3 (25 April 2025). It has been updated from Revision 1 submitted at Deadline 1 (10 March 2023).
- 3.1.2 The Applicant will update this Draft National Policy Statement Tracker at each Examination deadline as specified within the Examination Timetable with a Final National Policy Statement Tracker submitted at Deadline 7 (04 August 2023).

