

Indaver Rivenhall IWMF DCO

Planning Act 2008

Infrastructure Planning (Applications: Prescribed Forms and Procedure)

Regulations 2009

# REPORTS [PINS Ref: EN0101038] CONSULTATION REPORT APPENDIX G - RESPONSE TABLES

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November 2023  
Indaver Rivenhall Ltd

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sustainable waste  
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## Appendix G-1: Regard had to statutory consultation responses

### 1 Introduction

- 1.1 The tables below set out the regard had by the Applicant to the consultation responses received as part of statutory consultation undertaken pursuant to the PA 2008 with stakeholders in relation to the Rivenhall IWMF DCO Application.
- 1.2 This Appendix is structured as follows:
- Table 1 sets out the responses received from s42(1)(a) and (b) consultees;
  - Table 2 sets out the responses received from s47 consultees.
- 1.3 Please note that a 'change' to the scheme is in this context.

**Table 1: Regard had to s42(1)(a) and (b) consultee responses**

Consultee	Date of response	S42(1)(a) and (b) consultation responses	How regard was given to the consultee's comment	Change?
National Grid	14/08/2023	Summary of response from National Grid:  <i>Due to the proximity of some of our assets, NGET wishes to express their interest in further consultation while the impact on our assets is still being assessed. Where the Promoter intends to acquire land, extinguish rights, or interfere with or work within close proximity to any of NGET's apparatus and land, this will require appropriate protection and further discussion on the impact to</i>	The consultee's response has been noted. Since the Proposed Development involves only engineering works that are carried out within the IWMF building, there will be no interference with the assets or any risk of damage. There is no intent to acquire land or extinguish rights, either. The Consented Scheme will benefit from a connection to the local distribution network (at the Galley's Corner substation (also known as the	No change has been made to the Proposed Development as a result of these comments.

Consultee	Date of response	S42(1)(a) and (b) consultation responses	How regard was given to the consultee's comment	Change?
		<p><i>its apparatus and rights. National Grid Electricity Transmission has high voltage electricity overhead transmission lines within or in close proximity to the order boundary. The overhead lines form an essential part of the electricity transmission network in England and Wales.</i></p> <p>A series of points for consideration are set out that seek general protection for nearby assets.</p>	<p>Braintree substation)). The Proposed Development involves no changes to the grid connection. Please refer to the <b>Grid Connection Statement (Doc Ref 7.5)</b> for further information.</p>	
UK Health and Security Agency	21/08/2023	<p>Summary of response:</p> <p><i>Whilst the developer has stated that the impact of the proposed development on the human population, environment and air quality has been scoped out, it has further been stated that the development of a more modern and efficient plant, with an increase in generating capacity, will result in a reduction in emissions to air. Concluding that the impact of the proposed facility on local air quality will be smaller than anticipated.</i></p> <p><i>Whilst we acknowledge this, we would recommend that the developer undertakes emissions modelling assessments relating to the operation of the proposed development to demonstrate the stated reductions, to confirm the developer's scoping conclusions that the proposed development will not have a detrimental effect on human health, the environment and local air quality.</i></p>	<p>The comments from the UKHSA have been noted. With respect, the Applicant believes that the response may be based on a slight misunderstanding of the material provided. It is not the contention of the Applicant that the Proposed Development will lead to a change in emissions to air. The <b>Preliminary Environmental Information Report (ES Volume 2 (Doc Ref 6.2))</b> table 6.1 makes clear that an assessment of air quality has been scoped out of the EIA as there would be <u>no change</u> compared to the Future Baseline (i.e. the Consented Scheme).</p> <p>Reference is made in the Applicant's <b>Scoping Report (ES Volume 3, Appendix 5.1 (Doc Ref 6.2))</b> at paragraph 9.2.15 reads: "...there will be no change to the impacts on air quality as a result of the Proposed Development. However, as outlined above, the impact of the plant once it is operating will be less than the impact modelled in the 2015 ES Addendum due to the emission</p>	No change has been made to the Proposed Development as a result of these comments.

Consultee	Date of response	S42(1)(a) and (b) consultation responses	How regard was given to the consultee's comment	Change?
			<p><i>limits being reduced. Therefore, the impact of the EfW plant on local air quality will be smaller than anticipated in the 2015 ES Addendum and will be unchanged by the Proposed Development."</i></p> <p>Reductions in air quality effects compared to the 2015 ES Addendum are related to the Consented Scheme and the adoption of updated Waste Incineration BAT Reference Note in December 2023, which has the effect of lowering emissions limits for the Consented Scheme. The Proposed Development will have <u>no effect</u> on emissions compared to the Consented Scheme. Therefore, no further emissions modelling is deemed necessary to support this DCO application. Therefore, there would be no impacts on human health associated with the proposed increase in generating capacity.</p>	
Braintree District Council	22/08/2023	<p>Summary of response:</p> <p>BDC noted that the Consented Scheme benefits from an existing planning permission and that the proposed changes are all internal to the already consented building that is already under construction.</p> <p>On climate change, BDC wrote:  <i>"In terms of comments on the PEIR, Braintree District Council is of the opinion that whilst the documentation states that there will be no increase in direct greenhouse gas emissions from the</i></p>	<p>Paragraph 7.4.19 of the main PEIR explains why there will be no increase in direct greenhouse gas emissions (i.e., Scope 1 emissions) so the Applicant does not consider that the statement in the non-technical summary is or could be misleading.</p> <p>The Proposed Development will not lead to any changes in the carbon output of the Consented Scheme. What reductions there are that are caused by the Proposed Development are through the displacement of</p>	<p>Updates have been made to the Environmental Statement in light of comments made by BDC, but no changes have been made to the Proposed</p>

Consultee	Date of response	S42(1)(a) and (b) consultation responses	How regard was given to the consultee's comment	Change?
		<p><i>facility, this statement could be misleading (Para 7.1 to 7.4 PEIR Non-Technical Summary). It doesn't cite the scope 1, scope 2 or scope 3 emissions of the plant despite the fact it will be overall positive from a carbon emissions point of view. At paragraph 7.3 it is suggested that it should state that carbon emissions shall be recorded and published and offset against the positive carbon impact for the environment and that these would be nominal in relative to the positive effects of the site upon carbon emissions."</i></p> <p>BDC, along with ECC, commissioned Jacobs to carry out a review of the noise information contained in the PEIR. Jacobs' report can be summarised as follows:</p> <ul style="list-style-type: none"> <li>- The ES should reference the Planning Practice Guidance on the consideration of noise impacts;</li> <li>- It is unclear how the facility will generate greater output of electricity and what the implications of that would be;</li> <li>- The baseline data should consider the consented operations of the Dry Silo Mortar ('DSM') Plant from 0600-0700 and 1900-2200hrs, as well as cumulative effects of the operation of the Consented Scheme and the DSM plant.</li> <li>- The noise assessment should be carried out in line with BS4142:2014+A1:2019.</li> </ul>	<p>energy from the national grid that would otherwise have been derived from fossil fuels. Whilst the increase in electrical output is nominal when considering energy needs on a broader scale, the fact that it can be achieved with no additional fuel throughput, and therefore no increase in emissions (including carbon emissions) is considered a significant benefit of the Proposed Development.</p> <p>The Council's comments on noise are noted and have been taken onboard through the preparation of the <b>Environmental Statement (Doc Ref 6.1)</b>. This includes making it clearer in the <b>ES Vol. 1, Chapter 3: Proposed Development and Construction (Doc Ref 6.1)</b> how the facility will generate greater output of electricity and what the implications are expected to be.</p> <p>The approach taken to assessing the noise effects of the Proposed Development is to use the noise limits set out in Condition 38 of the IWMF TCPA Permission. This allows for a clear assessment of the effects of the Proposed Development specifically against the future baseline. This means that a noise assessment in line with BS4142:2014+A1:2019 has not been carried out, as this makes it more difficult to understand the effects of the Proposed Development specifically.</p>	<p>Development itself.</p>

Consultee	Date of response	S42(1)(a) and (b) consultation responses	How regard was given to the consultee's comment	Change?
		Noise sensitivities should be consistent for all time periods.	The noise assessment carried out, the findings of which are presented in the <b>ES Vol. 1, Chapter 8: Noise and Vibration (Doc Ref 6.1)</b> , demonstrates that the Proposed Development would have a negligible impact (i.e., not significant in EIA terms) when assessed against the future baseline and that the Proposed Development is acceptable in this regard. No mitigation is required to achieve this.	
Essex County Council	23/08/2023	<p>Summary of response:</p> <p>Factual errors in the PEIR were pointed out, which included:</p> <ul style="list-style-type: none"> <li>▪ The names and locations of nearby residential properties;</li> <li>▪ Clarification of the number of public rights of ways that cross the IWMF access road from the A120; and</li> <li>▪ Clarification of the IWMF's planning history.</li> </ul> <p><i>“Alternatives – it is noted within the PEIR that one alternative is the “Do nothing scenario” It is stated at paragraph 4.3.3 that without the proposed development “...the beneficial effects of the development would also not be realised”. However, we would wish to point out the direct use of heat and steam for heating or use in a commercial/industrial use is more efficient than energy generation. The permitted scheme includes a Market De-Ink Paper Pulp plant using some of</i></p>	<p>All factual errors point out by ECC have been taken onboard in the drafting of the <b>Environmental Statement (Doc Ref 6.1)</b>.</p> <p>ECC's comments on the use of heat are noted. The Proposed Development does not involve any changes to the way that the Consented Scheme would harness or utilise heat, only to the amount of steam that could be directed through the turbine generator rather than directly recirculated via a bypass valve. The Proposed Development would not prevent the Applicant from constructing a Market De-Ink Paper Pulp plant at the site or connecting the EfW plant to any other heat user.</p> <p>ECC's support for taking action on climate change if there are no significant adverse environmental effects is noted. The Proposed Development would help displace the need for energy generated from fossil fuels, and would</p>	Updates have been made to the Environmental Statement in light of comments made by BDC, but no changes have been made to the Proposed Development itself.

Consultee	Date of response	S42(1)(a) and (b) consultation responses	How regard was given to the consultee's comment	Change?
		<p><i>the heat, steam and power directly and therefore more environmentally sustainable development. That said, ECC is not opposed to energy generation from waste in principle, but when considering the merits of the IWMF, by both the Inspector in 2010 and the Waste Planning Authority (WPA) in 2016, it was on the basis of an integrated facility with a direct use of the heat and steam, which delivered sustainable development.”</i></p> <p>ECC is supportive of taking action on climate change and supports proposals that seek to increase the amount of renewable energy generated in Essex, provided there are no significant adverse environmental impacts that cannot be managed and/or mitigated.</p> <p>The PEIR does not mention that ECC has set up the Essex Climate Action Commission since May 2020, which will run until 2025. The Commission's recommendations were adopted and form the basis of the Climate Action Plan (November 2021). The Applicant should reference the Essex Climate Action Plan and comment on the scheme's implications for it.</p> <p>ECC reiterate the comments made by BDC on Climate Change the Greenhouse Gases. <i>“It is considered that the DCO application should summarise the carbon emission figures, to demonstrate the positive carbon impact on the environment. If the DCO were to be granted that</i></p>	<p>do so without any significant adverse environmental effects.</p> <p>The <b>ES Volume 1, Chapter 7: Climate Change and Greenhouse Gases (Doc Ref 6.1)</b> includes reference to the Essex Climate Action Commission and the Essex Climate Action Plan at paragraph 7.2.5.</p> <p>As per the response to BDC, the Proposed Development would not result in any change to carbon emissions from the Consented Scheme, so does not itself justify a requirement for carbon monitoring as this would not be reasonably related to the proposals.</p> <p>Please refer to the response to BDC's comments for how the Applicant has had regard to ECC's comments on noise and climate change.</p> <p>The Proposed Development will not result in any changes to the permitted number of heavy goods vehicle movements compared to the Consented Scheme. It will not change the number of employees either during the construction or operational phases compared to the Consented Scheme. Given that there will be no material change in vehicle movements compared to the Consented Scheme, it is not clear why a Transport</p>	

Consultee	Date of response	S42(1)(a) and (b) consultation responses	How regard was given to the consultee's comment	Change?
		<p><i>carbon emissions should be recorded and published, to show the positive impact even if small.</i></p> <p>On noise, ECC, alongside BDC, commissioned Jacobs to carry out a review of the noise information contained in the PEIR. A summary of Jacob's comments is set out in the summary of BDC's response above.</p> <p><i>"The proposal should be accompanied by a Transport Statement, the scope of which should be agreed with the Highway Authority as soon as possible."</i></p> <p>It is not clear what the actual description of development will be for the 'Proposed Development'.</p> <p>The IWMF was consented on the basis of including a de-ink paper pulp plant, to make more direct efficient use of some of the heat and steam. ECC have considered a section 73 application (ref: ESS/39/23/BTE) to delete condition 66 of the IWMF TCPA Permission which, at the time of writing, has been resolved to be granted. <i>"However, this does not change the view of the WPA, that the IWMF was for an integrated facility and should the CHP/EfW element of the IWMF commence operation without out all other elements of the IWMF being built and available to operate, then the WPA shall need to consider whether there</i></p>	<p>Statement is needed as it is not a statutory requirement set out in Regulation 5 of The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009. As such, the Applicant has chosen not to provide a Transport Statement. This was explained to ECC at a meeting held on 18<sup>th</sup> October 2023, who have subsequently agreed that on the basis the Proposed Development will not result in a change to the vehicle movements associated with the Consented Scheme, a Transport Statement is not necessary.</p> <p>The description of the development for the Proposed Development was set out in paragraph 3.2.4 of the main PEIR and explained that the works consist of engineering operations to the inlet control valves of the consented EfW Plant. The description of the Proposed Development is further set out in Schedule 1 of the <b>Draft Development Consent Order (Doc Ref 3.1)</b> and <b>ES Volume 1, Chapter 3: Proposed Development and Construction (Doc Ref 6.1)</b>.</p> <p>Regarding the issue of integration, the Proposed Development is limited to increasing the amount of steam which could lawfully be directed through the turbine generator which forms part of the Consented Scheme. This is</p>	



Consultee	Date of response	S42(1)(a) and (b) consultation responses	How regard was given to the consultee's comment	Change?
		<p><i>is a breach of planning control. If the proposal is actually for a standalone Energy from Waste facility with capacity up to 65MW, rather than a CHP with increased output capacity with other integrated waste management processes, then it is the WPA's view the DCO should be submitted and considered on this basis, rather than just consideration of a change to the output capacity of the energy generation plant. A stand-alone Energy from Waste Facility of up to 49.9MW was not considered, by way of planning application, by the SoS in 2010 or the ECC WPA in 2016."</i></p> <p>It is not clear why the Order Limits cover the whole footprint of the IWMF building.</p> <p>If granted, it is not clear how the extant planning permission would be affected by any DCO and which permission would take primacy should conflict arise.</p> <p>On Flood Risk, ECC noted that the <i>"submission does not change the on site approved built form in any material way and hence no additional comment is needed."</i></p> <p>On Green Infrastructure, ECC noted <i>"that there are no proposed external landscaping changes or impacts to the consented scheme and hence no comments are made."</i></p>	<p>the basis upon which the DCO application has been submitted and should be considered. The Proposed Development would not prevent any other elements of the Consented Scheme from being built and, as set out in the <b>Explanatory Memorandum to the Draft Development Consent Order (Doc Ref 3.2)</b>, this DCO application does not seek to prevent ECC from continuing to control the development of the Consented Scheme. The Applicant is aware of ECC's views in respect of the issue of integration and is open to discussions with ECC on this matter, but any such discussion would happen outside the consideration of the DCO application.</p> <p>Regarding the Order Limits, Condition 19 of the IWMF TCPA Permission requires details of the IWMF process layout and configuration to be submitted to and approved by the Waste Planning Authority prior to installation of process equipment or plant within the IWMF. This condition has not yet been discharged. Therefore, a reasonable degree of flexibility is required to accommodate any potential changes to internal plant configuration. It is for this reason that the <b>Order Limits (Doc Ref. 2.1)</b> have been drawn around the footprint of the consented IWMF building, rather than a smaller area within it.</p>	

Consultee	Date of response	S42(1)(a) and (b) consultation responses	How regard was given to the consultee's comment	Change?
		<p>On ecology, it was agreed that the proposals will not result in any impacts from adverse air quality on any ecological receptors. The same is true for impacts upon designated sites, protected and Priority species/habitats.</p> <p>ECC confirmed they have no comment on the scheme from a landscape and visual point of view.</p> <p>ECC would welcome the opportunity to work with the applicant on how to maximise the benefits of the project to education, skills and employment across Essex, both during construction and operation.</p>	<p>An explanation of how the DCO would interact with the IWMF TCPA Permission is set out in the <b>Explanatory Memorandum to the Draft Development Consent Order (Doc Ref 3.2)</b>.</p> <p>ECC's comments on flood risk, green infrastructure, ecology and landscape and visual impacts are noted.</p> <p>On skills and employment, the Proposed Development would not itself lead to a change in the number of employees on the IWMF Site either during construction or operation. The Applicant is open to discussions with ECC on how best to maximise the employment and education benefits of the Consented Scheme, but any such discussion would happen outside of the consideration of the DCO application. This would be beneficial to ECC as skills and employment opportunities are most readily available during the construction phase, which is likely to be nearly over by the time any DCO is granted.</p>	
Environment Agency	22/08/2023	<p><i>Both volumes 1 and 2 at 2.4.22 and 2.2.20 respectively mention water management, we note that the water usage should be the same as for the consented scheme and we note that the site has a mains water supply connection. It appears that what is proposed is a closed system with water being recycled from steam to condensed states with low losses. As such it appears that water usage should be low. However, Essex along with</i></p>	<p>The Environment Agency's ('EA') comments are noted. The Proposed Development itself does not result in any additional water demand than the Consented Scheme. Section 3.8 of the <b>ES Vol. 1, Chapter 3: Proposed Development and Construction</b> sets this out. Therefore, no additional supply of water is needed to serve the Proposed Development.</p>	No change.

Consultee	Date of response	S42(1)(a) and (b) consultation responses	How regard was given to the consultee's comment	Change?
		<i>other areas of East Anglia experiences water stress with recent cases of lack of availability of water elsewhere in the region causing delays to proposals. We would suggest that there is a clearer illustration of the total water demand for the proposal in the Environmental Statement and that the Applicant engages with the water supply company to confirm availability of water to supply the proposal.</i>		
Anglian Water	23/08/2023	<p>Summary of response:</p> <p><b>Wastewater</b> It is noted that no wastewater connections are required for the commercial operations of the site, apart from staffing facilities.</p> <p><b>Water Supply</b> The Consented Scheme benefits from Upper Lagoon and New Field Lagoon that store water for the use of the facility. Anglian Water has provided a connection to the Consented Scheme for domestic and non-domestic uses. However, the supply has not been secured.</p> <p>Due to changes in the Environment Agency's abstraction reduction strategy, climate change and population growth, water resource supplies are being squeezed. Whereas Anglian Water have a statutory to supply water for domestic purposes, this does not apply to non-domestic purposes. Where new and unplanned non-domestic requests are received, there might be the need to decline in</p>	<p>The scope of the EIA has been agreed with the Planning Inspectorate following the submission of a <b>Scoping Report (ES Volume 2, Appendix 5.1 (Doc Ref 6.2))</b> by the Applicant. In accordance with Regulation 11(1)(a) of The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017, the relevant water and sewage undertaker (i.e., Anglian Water) was consulted. No response was received at the time.</p> <p>In any case, the Proposed Development does not involve any changes to water use compared to the Consented Scheme. The proposals relate only to the carrying out of engineering operations that would allow a greater amount of steam to reach the turbine, however, the overall amount of steam will not change compared to the Consented Scheme. As a result, an assessment of water resources as part of this DCO application is not considered necessary.</p>	No change made to the Proposed Development.

Consultee	Date of response	S42(1)(a) and (b) consultation responses	How regard was given to the consultee's comment	Change?
		<p>order to protect existing supplies and the environment.</p> <p>Anglian Water request that water resources be scoped into the Environmental Statement and a Water Resources Assessment undertaken to demonstrate the water requirements of the facility in terms of the split between domestic and non-domestic supply needs. The EIA for the Consented Scheme does not appear to provide the detailed information required in terms of the amount of water needed to be supplied by the water undertaker and implied that water requirements could be supplied via the lagoons and supplemented by abstraction.</p> <p><i>“As the DCO would provide a consent that would supersede the current consented scheme, we would welcome the draft DCO including Protective Provisions for Anglian Water, which would address any concerns regarding interactions with our assets.”</i></p>	<p>The <b>Draft Development Consent Order (Doc Ref 3.1)</b> has been prepared such that the DCO would not supersede the IWMF TCPA Permission, but would in fact have to be constructed and operated in accordance with the terms of that permission. Further information is provided in the <b>Explanatory Memorandum to the Draft Development Consent Order (Doc Ref 3.2)</b>.</p>	

## 2 Table 2: Regard had to s47 consultation responses

No.	S47 consultation responses	How regard was given to the consultee's comment	Change?
1.	<i>Please send copy of the Consultation Documents on USB stick as mentioned in advertisement in the Guardian.</i>	A USB stick was provided to the member of the public.	No change.
2.	<i>Hi. I don't believe you are interested in the views of the local community regarding the above, because if you were, you would not be in the process of building the facility that this unit will be part of. Thanks and regards.</i>	The IWMF is currently under construction following planning permission for such a facility being first granted in March 2010 by the Secretary of State following a public inquiry. National policy is clear that such infrastructure is a necessary and important part of the UK's waste management systems. Once complete, the IWMF at Rivenhall will help avoid having to send residual waste to landfill, instead using it to generate a reliable source of electricity. This is in accordance with the UK waste hierarchy. The Applicant is carrying out consultation pursuant to statutory requirements set out in the Planning Act 2008. However, the Applicant has chosen to exceed the minimum requirements, choosing to hold the statutory consultation period for 8 weeks – more than twice as long as the statutory minimum period. Further information on how the Applicant has engaged with the public and other key stakeholders is set out in the <b>Consultation Report (Doc Ref 5.1)</b> .	No change.
3.	<i>Please inform me of the following: 1 whether the proposed extension to the electricity generating capacity, resultant on additional steam passing through the turbines, will result in additional output from the chimney. 2 will there be an additional chimney 3 will there be an enlargement of the anticipated size of the plume from the chimney /s 4 why was this proposed change not part pf the original proposal for the plant and hence, not included in earlier submissions to the Dept of Environment and net zero Thank you</i>	1. The Proposed Development will not lead to any changes to the stack (i.e. the chimney) emissions compared to the Consented Scheme. The Proposed Development will not affect the maximum allowable throughput of waste compared to the Consented Scheme. As such, the overall amount of steam that is produced will also not change. The Proposed Development is only to alter the amount of the overall steam that reaches the turbine within the EfW component of the Consented Scheme.	No change.

No.	S47 consultation responses	How regard was given to the consultee's comment	Change?
		<p>2. There will be no additional chimney, nor will there will be any change to the external appearance of the IWMF as a result of the Proposed Development.</p> <p>3. There will be no enlargement of the anticipated size of the plume from the chimney as a result of the Proposed Development. This is because there is no change in the maximum amount of waste that will be combusted. Therefore, there would be no change to the amount of flue gases that are processed and released via the chimney as a result of the Proposed Development.</p> <p>4. Planning permission for the Consented Scheme was first issued in 2010. Since then, technology has advanced considerably in this field and become more commercially viable, reflecting the increasing use of such facilities to sustainably manage waste, notably in northern Europe and North America. This DCO application seeks to make best use of modern industrial technology to generate more electricity than was previously possible by installing more efficient plant and machinery. This more efficient plant was not available when the proposals for the IWMF were first granted planning permission in 2010. For further information on the need to deliver energy infrastructure, please refer to the <b>Planning Statement (Doc Ref 7.1)</b>.</p> <p>Further information is provided within the <b>ES Volume 1, Chapter 2: Existing Site Conditions and Consented Scheme</b> and <b>Chapter 3: Proposed Development and Construction (Doc Ref 6.1)</b>.</p>	
4.	From Witham Town Council, dated 14 July 2023:	The statutory public consultation was carried out in accordance with the <b>Statement of Community Consultation (Appendix</b>	Yes – an additional

No.	S47 consultation responses	How regard was given to the consultee's comment	Change?
	<p><i>The Town Council is very disappointed that despite being the largest local town to Rivenhall, you have never contacted us in relation to the current consultation even though residents in our north ward live close to the proposed facility. Likewise, you have not arranged a consultation event in Witham. Local residents have complained that your leaflet regarding the consultation was distributed along with a pizza flyer and could so easily been missed.</i></p> <p><i>I feel that you have let the people of Witham down in this regard and would hope that you can remedy this situation.</i></p>	<p><b>C-4 of the Consultation Report (Doc Ref 5.1)),</b> which itself was subject to consultation with the host authorities (ECC and BDC) as well as with the Site Liaison Group, which comprises representatives Rivenhall, Silver End, Bradwell, Coggeshall, Kelvedon and Feering Parish Councils. Further information on the measures taken to consult the local community and key stakeholders is set out in the <b>Consultation Report (Doc Ref 5.1).</b></p> <p>Following receipt of this letter, the Applicant provided a full written response to the Town Council and scheduled an additional public event to be held in Witham on 18<sup>th</sup> August. Further information on the event itself as well as the measures taken to publicise it are provided in the <b>Consultation Report (Doc Ref 5.1).</b></p>	<p>public event was held in Witham on 18<sup>th</sup> August 2023. No change was made to the Proposed Development, however.</p>
5.	<p><i>Thank you for your comprehensive response to my enquiry, for which I am most grateful.</i></p> <p><i>I have just one further question as a consequence of the increasing national focus on the excess deaths produced by poor air quality, and in particular the danger to school age children following air pollution being stated by a coroner to be the cause of death of a child - the first time this has happened in the UK. Does the plume put particals [sic] in the air and hence degrade the air quality in the area it traverses? If so, has this been quantified and how close will it bring airborne pollution to the current legal limits? I work in education in the area and know the number of children in the schools under the likely spread of the plume.</i></p> <p><i>I look forward to your response.</i></p>	<p>The Consented Scheme is currently under construction pursuant to the details set out in the IWMF TCPA Permission. The Consented Scheme includes a series of process that are designed to remove as many potentially harmful pollutants as possible from the flue gases, before they are emitted via the stack. The emissions that are released from the stack are controlled in accordance with the Environmental Permit (ref: EPR/FP3335YU; as varied by Permit number EPR/FP3335YU/V002 and transferred to the Applicant under number EPR/CP3906LP) that has been issued by the Environment Agency.</p> <p>It should be noted that the Proposed Development will have no effect on the emissions that are released from the stack compared to the Consented Scheme. For this reason, the Planning Inspectorate agreed that an assessment of potential air quality effects associated with the Proposed Development can be scoped out of the Environmental Impact Assessment</p>	<p>No change.</p>

No.	S47 consultation responses	How regard was given to the consultee's comment (ES Volume 2, Appendix 5.2: Planning Inspectorate Scoping Opinion (Doc Ref 6.2)).	Change?
6.	<p><i>Thank-you for your reply to my queries. With regards to point 2, I'm not sure if you've misunderstood my question, or if I wasn't clear enough. You state that the amount of waste delivered to the IWMF each year will not change, and that therefore the amount of waste to be incinerated will also not change. This will only be the case if Indaver stick to the current plan for sorting and processing as much waste as possible waste for recycling before burning the remaining non-recyclable waste. My concern is that with an apparently unlimited opportunity to generate electricity, there would be nothing to prevent you from incinerating more (or even all) of the waste that is delivered. Therefore my question is: What controls are in place to prevent you from increasing the amount of waste to be incinerated [sic]?</i></p>	<p>Condition 29 of the IWMF TCPA Permission states that no more than 853,000 tonnes per annum of waste can be delivered to the IWMF Site. This will not change as a result of the Proposed Development.</p> <p>The amount of waste that is incinerated is limited to 595,000 tonnes per annum in two ways. Firstly, the physical capacity of the energy from waste plant means that it would not be possible to process more waste than this without increasing the size of the energy from waste plant (e.g. the bunker). The Proposed Development does not involve any changes to the physical capacity of the energy from waste plant. Secondly, the Environmental Permit (Permit Number EPR/FP3335YU; Variation Permit number EPR/FP3335YU/V002; and Transfer Permit number EPR/CP3906LP) requires that that maximum annual waste throughput for the waste incineration plant does not exceed 595,000 tonnes per annum.</p> <p>The Proposed Development would not change either of these controls. Therefore, whilst the amount of electricity that can be generated from the incineration of the waste will increase, the maximum amount of waste that is incinerated will not.</p> <p>Please refer to <b>ES Volume 1, Chapter 3: Proposed Development and Construction (Doc Ref 6.1)</b> for further information.</p>	No change.
7.	<p><i>I have recently moved to the Kelvedon area and I have just found out about the waste management site that is being installed nearby.</i></p>	<p>Planning permission for the development of the IWMF was first issued in 2010 (LPA ref: ESS/37/08/BTE). An amended planning permission was then issued in 2016 by Essex County Council (LPA ref: ESS/34/15/BTE), and it is pursuant to this</p>	No change.



No.	S47 consultation responses	How regard was given to the consultee's comment	Change?
	<p><i>I just wanted to enquire whether the review of any impacts on the local community in terms of pollution and radiation had been reviewed to ensure the residents of Kelvedon are not being put at risk.</i></p>	<p>2016 planning permission that the IWMMF is currently being built ('the IWMMF TCPA Permission'). Both the 2010 and the 2016 planning permissions were supported by environmental information that considered the potential for any significant environmental effects arising from the construction and operation of the Consented Scheme. No specific assessment of radiation was carried out as there would be no potentially radioactive materials involved in the construction or operation of the Consented Scheme. The environmental assessment did however consider potential effects on air quality and on human health more generally. In both cases, the effects were deemed to be acceptable. Furthermore, the operation of the Consented Scheme will be in accordance with an Environmental Permit issued by the Environment Agency (Permit Number EPR/FP3335YU; Variation Permit number EPR/FP3335YU/V002; and Transfer Permit number EPR/CP3906LP).</p> <p>Increasing the electrical generating capacity of the EfW component of the Consented Scheme (i.e., the Proposed Development) can be achieved without the need for additional throughput of fuel. This means that there would be no associated air quality impacts compared to the Consented Scheme. Further information on this topic is set out in the <b>ES Volume 1, Chapter 3: Proposed Development and Construction (Doc Ref 6.1)</b>. For this reason, the planning inspectorate agreed that a further assessment of likely air quality effects could be scoped out of the EIA (<b>ES Volume 2, Appendix 5.2: Planning Inspectorate Scoping Opinion (Doc Ref 6.2)</b>).</p>	
8.	<p><i>My husband and I met you at the Institute in Kelvedon when you held a open day there and we would very much like to visit</i></p>	<p>The members of the public were invited to attend an Open Day on 16<sup>th</sup> August which they attended.</p>	No change.

No.	S47 consultation responses	How regard was given to the consultee's comment	Change?
	<i>the site if possible on Wednesday 16 August. Could you please advise if this is possible, if so could you please send me details.</i>		
9.	<i>We've had a comment on our Facebook post to say that all of the commenting options allow feedback to be given to Indaver - is it the case that all feedback must then be included in the DCO process, or will a separate opportunity be given for residents to respond directly to the Planning Inspectorate?</i>	<p>A direct response was given to the member of the public to confirm that this statutory consultation was intended to allow feedback to be provided directly to the Applicant. All feedback is presented in the <b>Consultation Report (Doc Ref 6.1)</b>, including how the Applicant has had regard for the feedback (i.e., this table).</p> <p>It was also explained that there would be opportunities to participate in the examination process once the Application has been accepted by submitting a 'relevant representation'.</p>	No change.
10.	<i>I have read the leaflet that details your sustainable energy proposal and as a young person whose future depends on these proposals I think that this should definitely go ahead. I wholeheartedly support the proposal as it brings hope to people who feel that the government have led us to planet doom! I hope to see this go ahead!</i>	The Applicant notes the response and thanks the member of the public.	No change.
11.	<i>I have today received your leaflet inviting me to a meeting held 3 days ago. This appears to be typical of your modus operandi and as such I must object to your plans until the unanswered questions- Patel - have been resolved. [sic]</i>	This response was made in relation to the additional public event held in Witham on 18 <sup>th</sup> August 2023. Leaflets to publicise the event were distributed by the Applicant on 11 <sup>th</sup> August to the distribution company for immediate distribution. The Applicant apologises if anyone received a leaflet after the 18 <sup>th</sup> August. Other measures were taken to advertise the public event held in Witham to ensure that the leaflets were not the only way someone might find out about the additional event. This included displaying a poster in the Witham Tesco notice board (erected 31 July 2023) and on the notice board of the event venue (poster sent to the venue on 31 July 2023). Information on the event was also provided on the Applicant's project website, email and poster direct to Witham Town Council and the Site Liaison Group, via an advertisement in the Braintree and Witham Times, and on its various social media	No change.

No.	S47 consultation responses	How regard was given to the consultee's comment	Change?
		channels. Further information on the measures taken to advertise the additional public event held in Witham are provided in the <b>Consultation Report (Doc Ref 5.1)</b> .	
12.	<p><i>Yesterday August the 21st we received a leaflet entitled Have Your Say. Inside it gives dates of meetings which we are invited to attend.</i></p> <p><i>The dates and venues are :</i></p> <p><i>The Institute Kelvedon 6th July 4pm-8pm</i>  <i>Rivenhall Village Hall 14th July 1pm-4pm</i>  <i>Bradwell Village Hall 22nd July 9am-12pm</i>  <i>Coggeshall Village Hall 26th July 12pm-4pm</i>  <i>Silver End Village Hall 31st July 9am-12pm</i>  <i>Additional Event 18th August, 1pm-4pm Witham Spring Lodge Community Centre.</i></p> <p><i>Can you tell me please what is the point in delivering these leaflets now, when it is far too late to attend. Maltings Lane, where I live, is a very long road, this was definitely a waste of time for someone to deliver these leaflets. Also if anyone in my road and other roads where they were delivered yesterday wanted to attend one of these meetings they were unable to.</i></p> <p><i>Perhaps you would give this consideration when sending out leaflets in the future.</i></p>	Please refer to the response made to comment number 11.	No change.
13.	<p>From Witham Town Council, dated 23 August 2023.</p> <p><i>It was a pleasure to meet you on Friday to hear about your proposals and hopefully in due course we would like to have a site visit. We were very grateful that you were able to arrange a consultation for Witham residents but unfortunately for those without recourse to social media, we were told they were only made aware of the consultation by leaflet after the event. In</i></p>	The Proposed Development seeks the extension of the electrical generating capacity of the EfW component of the Consented Scheme. The principle of the location of the IWMF is a matter that was established through the planning permission granted by the Secretary of State in 2010. The land has been allocated for the development of waste management infrastructure since at least the adoption of the Essex and	No change.

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	<p><i>terms of the project itself, our Committee Members deliberated extensively on the matter. They understood and supported the need for alternative waste management solutions to reduce reliance on landfill and to contribute to electricity generation, but it was their opinion that the chosen location of the proposed facility raises significant concerns. They recognised that waste being transported to the site from outside the county would inevitably increase traffic movements and have an impact on residents and the environment. It is the Committee's belief that the Rivenhall Integrated Waste Management Facility should not have been built in its current location due to the inadequacy of the road infrastructure and as such, Members stand firm in their conviction that the National Government, Essex County Council, and Indaver should consider improvements to the local road network to allow further expansion of activity at the site.</i></p>	<p>Southend Waste Local Plan 2001. It is now allocated in the currently-adopted Essex County Council &amp; Southend-on-Sea Borough Council Waste Local Plan (2017) for the same.</p> <p>The Proposed Development involves no changes to the permitted number of heavy goods vehicle movements that are controlled by Conditions 3 and 4 of the IWMF TCPA Permission. The Proposed Development would not require any additional employees at the IWMF site either, so there would be no changes to the daily number of vehicles entering and exiting the IWMF site during operation.</p> <p>The Proposed Development relates only to the amount of electricity that the energy from waste plant is permitted to generate. There would otherwise be no expansion of activity as a result of the Proposed Development, including no additional amount of waste that would be delivered to the Consented Scheme for processing.</p>	
14.	<p><i>I received your publicity leaflet through my door on Sunday 20 August – AFTER all the “consultation” events, including an extra one in my town, had already taken place.</i></p> <p><i>This does not indicate a genuine interest in consultation, nor that your application is as benign as you suggest.</i></p> <p><i>I will be making my elected representative aware of this apparent disingenuity.</i></p>	<p>Please refer to the response made against comment number 11.</p>	
15.	<p><i>Hello [Applicant],</i></p> <p><i>Just a short email to say that I was at the Coggeshall presentation today and thought that this quote from Rudyard Kipling summed the meeting up If you can keep your head when all about you Are losing theirs and blaming it on you If you</i></p>	<p>The Applicant notes the response and thanks the member of the public.</p>	No change.

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	<i>can trust yourself when all men doubt you But make allowance for their doubting too .....</i>		
16.	<p><i>I refer to our brief conversation at the consultation day in the village hall last week.</i></p> <p><i>I am disturbed and not happy with the entire incinerator project and certainly not at all enthusiastic about the enlargement of its capacity, even though you dress it up with producing more electric power.</i></p> <p><i>The corollary is that you will produce more of your poisonous fumes that will kill and maim us.</i></p> <p><i>I asked for the estimated readings your poisonous chimney stack will pour out over the local residence.</i></p> <p><i>Please send me this and also remind me why no one is going to check the figures you say you will adhere to.</i></p> <p><i>I would also like to be directed to whomsoever feels these fumes are safe for people to live under.</i></p>	<p>The Proposed Development involves only the extension of the electrical generating capacity of the EfW component of the Consented Scheme. It does not involve the overall enlargement of the Consented Scheme's capacity either in terms of the amount of waste that is permitted to be delivered to it each year, nor its physical size.</p> <p>The operation of the Consented Scheme is subject to compliance with an Environmental Permit issued by the Environment Agency (Permit Number EPR/FP3335YU; Variation Permit number EPR/FP3335YU/V002; and Transfer Permit number EPR/CP3906LP). This sets limits on, amongst other things, the emissions concentrations from the stack. The Environmental Permit includes requirements to monitor emissions and provide the results to the Environment Agency in accordance with the terms of the Environmental Permit. The Proposed Development would not change this.</p>	No change.
17.	<p><i>1. The proposal leaflet and website appear to concentrate on the EfW component of the IWMF. It ignores the requirement to process the incoming waste to extract recyclable materials, which is a major part of the planning permission that has been granted.</i></p> <p><i>2. The leaflet and website claim that this change will allow more electricity to be generated from the plant without the need for more waste to be incinerated. What is to prevent Indaver from using this additional capacity by increasing the amount of waste to be burned?</i></p>	<p>1. It is correct that the consultation relates solely to the Energy from Waste component of the Consented Scheme. This is because the DCO application relates only to how much electricity the EfW plant is allowed to generate. It will not affect the amount of waste that is delivered to the IWMF, nor the way in which it will be processed, which will continue to as per the details approved through the IWMF T CPA Permission.</p> <p>2. The amount of waste that is incinerated is limited to 595,000 tonnes per annum in two ways. Firstly, the physical capacity of the energy from waste plant means that it would not be possible to process more waste than this without increasing the size of the energy from waste plant (e.g. the bunker). The Proposed</p>	No change.

No.	S47 consultation responses	How regard was given to the consultee's comment	Change?
		Development does not involve any changes to the physical capacity of the energy from waste plant. Secondly, the Environmental Permit (Permit Number EPR/FP3335YU; Variation Permit number EPR/FP3335YU/V002; and Transfer Permit number EPR/CP3906LP) requires that that maximum annual waste throughput for the waste incineration plant does not exceed 595,000 tonnes per annum. Finally, Condition 29 of the IWMF TCPA Permission controls the maximum amount of municipal waste that can be delivered to the IWMF for processing each year. This will not change as a result of the Proposed Development/	
18.	<i>How dare you consider a proposal of this magnitude so close to built up communities. We have just moved into the area to raise a family and now we have to reconsider this decision. It's not just the pollution from site, it's from the hundreds of lorries that will be heading to and from site. To those making the decision on this proposal, consider how you would feel having something like this in operation near your home.</i>	The IWMF TCPA Permission was first granted in 2010. The IWMF is currently under construction, with the main site construction works having started in 2022. This DCO application seeks permission only to increase the amount of electricity that the Energy from Waste component of the IWMF can generate. It will not affect the total amount of waste that is processed by the Consented Scheme, hence it will also not affect the number of vehicles entering and exiting the site, the external appearance of the IWMF, nor have any effects on air quality.	No change.
19.	<i>Where would the additional waste come from, and will the local roads be upgraded to cope with all the additional traffic.</i>	The Proposed Development does not involve processing any additional waste compared to the Consented Scheme. As such, there would be no associated increase in daily vehicle movements compared to the Consented Scheme.  For further information, please refer to the <b>ES Volume 1, Chapter 3: Proposed Development and Construction (Doc Ref 6.1)</b> .	No change.
20.	<i>I visited your exhibition in Kelvedon at the Institute and was impressed by the way you trying to be climate friendly.</i>	The Applicant notes the response and thanks the member of the public.	No change.

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21.	<p><i>The location of this plant is a disgrace. With so many other locations this could have gone off of an existing main road such as A12. This plant was also reliant on the Braintree to A12 A120 dual carriageway being built with access to the plant from this road and that does not appear to be materialising leaving our villages liable to heavy truck traffic!</i></p>	<p>Please refer to the response given for comments 13 and 27.</p>	<p>No change.</p>
22.	<p><i>I spoke to you at the Coggeshall meeting today and you said that you would be able to show me the site if I got in touch. Perhaps you could let me know when this might be possible. Regards</i></p>	<p>The member of the public was contacted and invited to attend one of the Open Days.</p> <p>Please refer to the <b>Consultation Report (Doc Ref 6.1)</b> for further information on the Open Days.</p>	<p>No change.</p>
23.	<p><i>Feering Parish Council are concerned about the consultation and documentation as it stands for the DCO application. It is not clear from this documentation whether the DCO will include any other components apart from the energy from waste or whether the application is just in relation to the energy from waste. The Parish Council acknowledge that the generation of more electricity from the same amount of waste is a sustainable option, however this would need to ensure that all other environmental impacts, ie scrubbing of exhaust gases and monitoring of pollutants are undertaken.</i></p> <p><i>Feering Parish Council are aware that a scoping consultation was undertaken prior to this DCO consultation and the only relevant parish council which was consulted was Kelvedon. Feering Parish Council would like to ensure that we are consulted on all aspects of this development, particularly as the APFP Regulations, Schedule 1, states that prescribed consultation bodies include "relevant" Parish Councils which means a body which has responsibility for the location where the proposals may or will be sited or has a responsibility for an area which neighbours that location. On this basis, more parishes than Kelvedon should have been consulted and we would like to ensure that Feering Parish Council and the other</i></p>	<p>A direct response was sent to Feering Parish Council on 12 September 2023. A summary of the response is as follows:</p> <p>The DCO application is simply to enable a greater amount of the overall volume of steam generated through the incineration of waste to reach the turbine. The overall amount of steam generated will not change, nor will the amount of fuel that is incinerated. All other processes, including the treatment of flue gases and monitoring of emissions, will remain as per the IWMF TCPA Permission and Environmental Permit (ref: EPR/FP3335YU; Variation Permit number EPR/FP3335YU/V002; and Transfer Permit number EPR/CP3906LP).</p> <p>In respect of your second point, it is correct that the Planning Inspectorate ('PINS') undertook a consultation with the prescribed bodies before adopting their Scoping Opinion. For the purposes of that consultation, they consulted only Kelvedon Parish Council. This is because, as set out in the PINS Advice Note 3 paragraph A4.2, the 'relevant' parish council is that in which the Proposed Development and any associated development would be located. References to neighbouring</p>	<p>No change.</p>

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	<p><i>surrounding parishes who are part of the Site Liaison Committee are included in all future consultations.</i></p>	<p>councils passing the 'relevant test' are for projects located in Wales only. This is also correct with reference to the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009/2264), as amended by the Infrastructure Planning (Prescribed Consultees and Interested Parties etc.) (Amendment) Regulations 2013/522 reg.3(3)(g)(iii) to provide for differing provisions for England and Wales. Strictly speaking therefore, PINS were not incorrect to only consult Kelvedon Parish Council as the relevant parish council.</p> <p>Importantly, the consultation on the Scoping Opinion was carried out by PINS, not by the Applicant. We understand the importance of consulting with nearby parish councils. For this reason we have opted to include Kelvedon Parish Council (as the 'host' parish council) and Feering Parish Council as well as all other neighbouring parish councils in our statutory consultation. We will continue to ensure that Feering Parish Council (and all other Parish Councils that comprise the Site Liaison Committee) are kept fully up to date with proceedings.</p>	
24.	<p><i>The proposal should stay as the original proposal not get bigger</i></p>	<p>The Proposed Development would only increase the electrical generating capacity of the IWMF. The physical size of the Consented Scheme would not change, nor would the amount of waste that is delivered to the IWMF.</p> <p>For further information, please refer to the <b>ES Volume 1, Chapter 3: Proposed Development and Construction (Doc Ref 6.1)</b>.</p>	No change.
25.	<p><i>I object to any changes to the original proposal. The site is in a rural area, close to where I live. I object to any increase in operational noise, any increase in the height of the chimney, any increase in pollution and any decrease in air quality. I am sceptical about the assurances given by Indaver and the reasons behind the desire to be classified as an NSIP. It</i></p>	<p>The Proposed Development would have a negligible impact on operational noise compared to the Consented Scheme. No mitigation is required to achieve this. Further information on this is provided in <b>ES Volume 1, Chapter 8: Noise and Vibration (Doc Ref 6.1)</b>.</p>	No change.



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	<p><i>appears that Indaver are continually making changes to the scheme, which may seem small in themselves, but collectively have completely changed the nature of the site that was originally agreed.</i></p>	<p>The Proposed Development does not involve any changes to the height of the chimney.</p> <p>On air quality, please refer to the response to comment number 5.</p> <p>The classification of the Proposed Development as a NSIP is a legislative requirement. For further information on the legislative basis on which this application is made, please refer to the <b>Planning Statement (Doc Ref 7.1)</b>.</p>	
26.	<p><i>This is an example of continuing scope creep.</i></p> <p><i>The leaflet outlining the latest change is misleading:</i></p> <p><i>"3.6 The environmental effects of allowing the IWMF to operate at full efficiency are primarily beneficial. Generating a greater amount of electricity from reliable, sustainable sources means there is less reliance on fossil fuels for the country's energy needs. This has clear benefits to tackling climate change and global warming."</i></p> <p><i>I'm not sure how the waste for this plant is considered as a sustainable source when it is being burnt and the source is waste which in itself has been deemed to not be sustainable, otherwise it would be re-cycled. I expect the majority of the fuel will be plastic which is itself derived from a fossil fuel. Therefore the plant is not reducing the use of fossil fuels but just burning a more processed version of a fossil fuel.</i></p> <p><i>This is not sustainable waste management.</i></p> <p><i>A good definition of Sustainable waste management is found below, which is the opposite of this proposal:</i></p> <div data-bbox="253 1316 1064 1420" style="background-color: black; height: 65px; width: 100%;"></div>	<p>The Proposed Development does not seek to change the amount or composition of waste that is incinerated compared to the Consented Scheme.</p> <p>Residual waste will be incinerated at the Rivenhall IWMF, which would otherwise be sent to landfill. The energy hierarchy is clear that recovery – including recovery for energy – sits above disposal. Incinerating waste for energy recovery is an important component of a sustainable waste management system and does not diminish efforts to prevent, reuse, or recycle waste first.</p> <p>Emission limits from the Consented Scheme are set out in the Environmental Permit issued by the Environment Agency (Permit Number EPR/FP3335YU; Variation Permit number EPR/FP3335YU/V002; and Transfer Permit number EPR/CP3906LP). The Proposed Development does not involve any changes to the way that flue gases are treated and there would be no changes to air quality effects compared to the Consented Scheme. For these reasons, the Planning Inspectorate agreed in their <b>Scoping Opinion (ES Volume 2, Appendix 5.2 (Doc Ref 6.1))</b> that an assessment of air quality effects could be scoped out of the EIA.</p>	No change.

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	<p><i>“Sustainable waste management aims to keep materials in use for as long as possible and minimise the amount of solid waste that is disposed of in landfill or through incineration.”</i></p> <p><i>Trying to rebrand an incinerator as sustainable waste management is the opposite of what it actually is:</i></p> <p>[REDACTED]</p> <p><i>Why is sustainable waste management so important? Old-school waste management by incineration and landfill contributes to greenhouse gas emissions and declines in air and water quality. UK industries are responsible for in excess of 500 million tonnes of greenhouse gas emissions each year, thought to significantly contribute to global warming. As a result, the UK government has pledged to cut carbon emissions by 78% by the year 2035 to mitigate the devastating effects of climate change on the natural world. Through similar sustainability policies, neighbouring European countries like Norway have reduced emissions and preserved their stunning natural landscapes, keeping fjords and oceans clean of litter. The UK can follow in these footsteps if all businesses do their part to sustainably manage their waste.</i></p> <p><i>There is no mention of the carbon dioxide output or whether the increased production rate will create more toxic output. Is there anything specific about the proposal that you would like to see more information on in the future?</i></p> <p><i>Why all the recycling elements of the plan were removed, leaving us with a waste burning 35 stack and millions of tonnes of greenhouse gas emissions. Exact figures of how much greenhouse gasses will be emitted from the chimney each year and by vehicle movements to and from the site.</i></p>	<p>The Proposed Development will allow a greater amount of electricity to be generated without the need for an increase in the throughput of fuel. The greater amount of electricity generated will help displace the need for electricity that is based on fossil fuels. The Proposed Development therefore has beneficial effects on climate change (albeit small).</p> <p>The Applicant agrees that the sustainable management of waste is vitally important and is seeking to help deliver exactly this. Since Norway is mentioned, it is worth noting that waste incineration is a key component of that nation's waste management system, since sending waste to landfill has been banned since 2009.</p> <p>The Proposed Development involves no changes to the permitted number of heavy goods vehicle movements that are set controlled by Conditions 3 and 4 of the IWMF TCPA Permission. The Proposed Development would not require any additional employees at the IWMF site either, so there would be no changes to the daily number of vehicles entering and exiting the IWMF site during operation.</p> <p>The Proposed Development will not prevent the development of any of the other elements of the Consented Scheme and the DCO (if granted) would not authorise any change to their development or operation. The Proposed Development only authorises works to the EfW plant element of the Consented Scheme and therefore this DCO application focusses on that element of the Consented Scheme.</p>	

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	<p><i>As well as accurate figures of the likely mix of release toxins and poisonous gasses.</i></p> <p><i>Details of what the waste will comprise and exactly where it will be sourced/localities it be derived from and where the ash waste will be disposed and where this will be transported to.</i></p>	<p>Further information on the Proposed Development and its likely environmental effects is provided in the <b>ES, Volume 1 (Doc Ref 6.1)</b>.</p>	
27.	<p><i>Great idea WRONG LOCATION! Why agree this then build lots of new houses near the site?? No 2nd phase A120 to A12 in sight to take the traffic to it - as stated originally!!!</i></p>	<p>Please refer to the response made against comment 13.</p> <p>Appropriate locations for new housing development is a matter for Braintree District Council to determine. It is a requirement of the IWMF TCPA Permission pursuant to which the IWMF is being built that all heavy goods vehicles associated with the construction and operation of the IWMF must access and egress the site via the A120. However, there is no requirement within the IWMF TCPA Permission that states that the A120 must be upgraded to a dual carriageway before the IWMF can be either operated or constructed. Furthermore, the Proposed Development will not lead to any change in daily vehicle movements compared to the Consented Scheme.</p>	No change.
28.	<p><i>This is just another unfortunate example of creeping development where Indaver has obtained permission for a project on the basis of various assurances, conditions &amp; limitations which it has then sought to evade or amend. The project should not have been approved in the first place. Any changes are only the thin end of the wedge &amp; should be rejected.</i></p>	<p>Planning permission for the IWMF was first granted in 2010. The delivery of the IWMF, which is a large-scale project, was dependent on the carrying out of minerals extraction works. This means that the programme for delivering the IWMF is necessarily a long one. The TCPA 1990 recognises that planning permissions may need to change to account for altered circumstances, and sets out provisions for doing this, namely at sections 73 and 96a of the TCPA 1990. Any such application is assessed and decided on its merits and in accordance with the TCPA 1990.</p> <p>The Proposed Development seeks to increase the amount of energy that can be recovered from the residual waste treated by the EfW plant. This is encouraged by the UK Government,</p>	No change.

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		<p>as set out in the 25 Year Environmental Plan (page 94) and the Waste Management Plan for England (page 79). Whilst the UK Government can provide strategies and encouragement, it is ultimately dependent on operators – in this case, the Applicant – to deliver the changes needed to help reach net zero by 2050. This DCO application is a necessary part of that process.</p> <p>As per the terms of the <b>Draft DCO (Doc Ref 3.1)</b> Part 2 paragraph 5, the Proposed Development would be constructed, operated and decommissioned in accordance with the terms of the IWMF TCPA Permission. This means that ECC would continue to have ‘control’ over the Consented Scheme even should a DCO be granted for the Proposed Development.</p>	
29.	<i>I am astonished that this leaflet has been delivered so late and after all the meetings</i>	Please refer to the response made against comment 11.	No change.
30.	<i>I strongly disagree with the proposal - if it's allowed there will be no stopping the inevitable increase of usage.</i>	Please refer to the response made against comment 6.	No change.
31.	<i>Sadly any thoughts or comments I have will be ignored as the thoughts and comments of residents of Coggeshall and the local area have been ignored since this project first reared it's head. Needless to say I am opposed to the proposal but sadly my opposition will, once again, be completely ignored.</i>	<p>Please refer to the <b>Consultation Report (Doc 5.1)</b> for information on how the Applicant has sought to carry out its non-statutory and statutory consultations.</p> <p>For further information on the Proposed Development, the need for it, and how it complies with national policy, please refer to the <b>Planning Statement (Doc Ref 7.1)</b>.</p>	No change.
32.	<p><i>Indaver is applying, via a DCO application, to increase the electricity output of the site from 49.9 megawatts per year to over 50 megawatts without - it claims - increasing the amount of waste it currently has permission to incinerate (currently 595,000 tonnes per year).</i></p> <p><i>On the face of it, this seems like a good thing; more electricity without burning more waste. What's not to like?</i></p>	A proposed requirement set out in the <b>Draft DCO (Doc Ref 3.1)</b> is for the operation of the IWMF (following completion of the Proposed Development) to accord with the conditions attached to the IWMF TCPA Permission. Should the Applicant wish to amend the terms of the IWMF TCPA Permission, this would require approval from ECC, and the DCO would continue to require the IWMF to be operated in accordance with the terms of the IWMF TCPA Permission (as amended). The IWMF TCPA	No change.

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	<p><i>But if Indaver's application is granted, the site will become a Nationally Significant Infrastructure Project (NSIP).</i></p> <p><i>NSIPs are major infrastructure developments in England and Wales that bypass normal local planning requirements.</i></p> <p><i>Essex County Council is the Waste Planning Authority and is currently responsible for examining new applications for this site.</i></p> <p><i>If the Rivenhall IWMF becomes an NSIP that tier of local government accountability will be taken away and the future of the site will lie solely in the hands of the planning inspectorate (PINs) and the Secretary of State (SoS) for Housing and Communities.</i></p> <p><i>Why should we care? Indaver says it can increase the electricity output due to new technologies without increasing the amount of waste it will burn. Indaver currently has permission to incinerate 595,000 tonnes of waste per year, all taken to the site by lorries (200 in and 200 out per day, every day). Indaver currently says it doesn't want to increase the amount of waste, just the amount of electricity.</i></p> <p><i>But Indaver has permission to process 853,000 tonnes of waste on the site - the other 258,000 tonnes were due to be processed by a de-inking and paper pulping facility, an anaerobic digestion (AD) plant, a material recycling facility (MRF), and a mechanical biological treatment (MBT) facility.</i></p> <p><i>But on July 28, 2023, Indaver successfully applied to ECC to delete Condition 66 which meant it no longer has to build the other facilities. I understand, however, the SoS is now reviewing ECC's decision and a new Environment Impact Assessment may now be required.</i></p>	<p>Permission will therefore remain the primary instrument by which the IWMF is controlled.</p> <p>Further information is set out in the <b>Draft DCO (Doc. Ref. 3.1)</b> and the <b>Explanatory Memorandum (Doc. Ref. 3.2)</b></p> <p>The Proposed Development does not involve any changes to the amount of waste that would be delivered to the IWMF each year, nor the amount that would be incinerated. Please refer to the response made against comment number 6 for further information.</p>	

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	<p><i>However, we must remember that the Rivenhall IWMF site is one of the worst examples of planning creep in the country. First it was only meant to burn 350,000 tonnes of waste; then in 2016, ECC increased this amount to 595,000 tonnes. First it was only meant to burn Essex waste only; then in 2016, ECC changed this so it could take waste from anywhere. First in 2010 it gained permission to be part of an IWMF; now for all intents and purposes the waste incinerator is a standalone facility.</i></p> <p><i>Given the history of the site's planning creep, ECC needs to make sure permission is not given to increase the amount of waste burned at the site.</i></p> <p><i>Already 595,000 tonnes would put Rivenhall in the top ten largest waste incinerators in the country.</i></p> <p><i>If the additional capacity of the already permitted but unallocated 258,000 tonnes of waste was diverted to the incinerator to help produce more than 50 megawatts per year (I understand the aim is 65 megawatts) it would make Rivenhall the largest waste incinerator in the country at 853,000 tonnes (more than Runcorn which is currently 850,000 tonnes per year).</i></p> <p><i>Indaver has said other new planning applications will be made for the site but as yet we don't know what they will be - there is no certainty for local communities in regards to what will eventually be built at the site.</i></p> <p><i>If Rivenhall is made an NSIP there will be less accountability and we could end up with hundreds of thousands of tonnes more waste being incinerated on this site. I therefore object to this application DCO application.</i></p>		
33.	<p><i>re: infrasound - can you confirm or not that the company's system of "steam forcing" does or does not have an</i></p>	<p>Neither the Consented Scheme nor the Proposed Development would have an infrasound effect.</p>	<p>No change.</p>

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	<p><i>infrasound effect in the locality and wider area - a bit like fracking - in basic terms.</i></p> <p><i>If there is an infrasound/vibration from such "steam forcing" affecting people's health and that of the natural world - please inform the public before your company does any more work on this project.</i></p>		
34.	<p><i>1) What consideration is being given to the application as a whole and the changes, including the removal of Condition 66</i></p> <p><i>2) In the most recent DCO notes, you state building 'as per the authorised planning' but this is not true but vague and misleading;- what are you building and what is the position regarding c66 and the removal of the elements identified.</i></p> <p><i>3) What will the scope of the DCO/Inspection actually be with C66 elements removed.</i></p> <p><i>4) What will be the impact of the removal of C66 on the volume and type of waste processed as you will not be processing any paper, AD waste or sorting contrary to the DCO application.</i></p> <p><i>5) What will be the impact on the overall efficiency be C66 elements removed and only the Incinerator operating (moves the plant down the waste hierarchy to disposal)</i></p> <p><i>6) What will be the increased heat wasted via the stack without the original components</i></p> <p><i>7) Why are you relying on a 2009 EIA given things like Ella's Law recent changes in AQ legislation and extant knowledge.</i></p> <p><i>8) What flood mitigation is in place given the base of the stack is below Sea Level;- the stack is 35m above local ground at (49m aod) and the rest of the 85m stack is below ground so the base is below sea level (datum)</i></p> <p><i>9) What will be the impact of all the additional heat wasted through the stack on the plume given you have an extant condition that states you must have no visible plume?</i></p>	<p>1. The Proposed Development is for the extension of the electrical generating capacity of the EfW component of the Consented Scheme. The IWMF TCPA Permission, therefore, is a highly important component of the DCO application. The <b>Draft Development Consent Order (Doc 3.1)</b> shows that it is proposed for the IWMF TCPA Permission to retain 'primacy' as the Proposed Development would be constructed and operated in accordance with the terms of the IWMF TCPA Permission.</p> <p>2. Information on the Consented Scheme currently under construction and the Proposed Development is set out in the <b>ES Volume 1, Chapter 2: Existing Site Conditions and Consented Scheme, and Chapter 3: Proposed Development and Construction (Doc Ref 6.1)</b>. At the time of writing, the section 73 application (ref: ESS/39/23/BTE) to vary the planning permission pursuant to which the Consented Scheme is being constructed (and to which this query relates) has received a resolution to grant permission by the ECC Development and Regulation Committee, however, the section 73 permission has not yet been issued.</p> <p>3. Information on the Proposed Development is set out in <b>ES Volume 1, Chapter 3: Proposed Development and Construction (Doc Ref 6.1)</b> and the <b>Planning Statement (Doc Ref 7.1)</b>.</p>	No change.

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		<p>4 – 6. This queries relate to the section 73 application and are not directly related to the Proposed Development.</p> <p>7. There will be no changes to air quality effects compared to the Consented Scheme. For this reason, an assessment of the air quality effects of the Proposed Development was agreed by PINS to be scoped out of the EIA.</p> <p>8. The Proposed Development does not give rise to any additional flood risk compared to the Consented IWMF. Information about the flood risk is set out in the <b>Flood Risk Assessment (Doc Ref 7.2)</b>.</p> <p>9. The Proposed Development will not result in any additional heat compared to the Consented Scheme as there would be no increase in the amount of waste that would be incinerated.</p>	
35.	<p><i>Evolving project which may be determined by transportation. Reduce traffic movements in and out. Reduced traffic movements in and out.</i></p>	<p>The Proposed Development will not lead to any change in daily vehicle movements compared to the Consented IWMF.</p>	No change.
36.	<p><i>Follow discussion with your presentation we are a lot happier with proposal- The concern is that some lorries will try to use the village Kelvedon as a route to the plant.</i></p>	<p>The Proposed Development will not itself give rise to any additional vehicle movements compared to the Consented Scheme. It is a requirement of the IWMF TCPA Permission that all heavy goods vehicles access the IWMF Site from the A120.</p>	No change.
37.	<p><i>Not understood that this NOT about changing IWMF elements but about producing more electrical power out of the same amount of waste so no more trucks than before. More publicity, perhaps school engagements.</i></p>	<p>Information on how the additional electrical energy capacity will be achieved is provided in <b>ES Volume 1, Chapter 3: Proposed Development and Construction (Doc Ref 6.1)</b>.</p>	No change.
38.	<p><i>Good Presentation</i></p>	<p>The Applicant notes the response and thanks the member of the public.</p>	No change.
39.	<p><i>Cannot see any reasons to be object</i></p>	<p>The Applicant notes the response and thanks the member of the public.</p>	No change.
40.	<p><i>Sounds then positive step forward towards the sustainability agenda but difficult to persuade population of benefits</i></p>	<p>The Applicant notes the response and thanks the member of the public.</p>	No change.



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41.	<i>I did not know about this meeting today.... This is outdated technology. Pumping CO2 into our air, when we are trying to stop produce it</i>	Please refer to the response made against comment 28.	No change.
42.	<i>In support</i>	The Applicant notes the response and thanks the member of the public.	
43.	<i>Appalling that this plant is still being considered after more 20 years + is intended to process waste from outside the area with 200 trucks on A120 which already needs upgrading/repairing. It is also upwind of the village and most fumes will blow into Coggeshall.</i>	<p>The Proposed Development involves no changes to the amount or type of waste that is processed at the IWFM compared to the Consented Scheme. It would also have no material impact on the number of vehicle movement associated with either the construction or operation of the IWFM compared to the Consented Scheme.</p> <p>On air quality, please refer to the response made to comment no. 5.</p>	No change.
44.	<i>The company is not practicing transparent practice claiming that Essex will produce the majority of the waste that you burn implying this is household waste and yet ECC have yet to sign a Contract with you . Leaflets inviting people to the consultations were not distributed to all households. Which means many people will not be able to visit in the given time. Access to real time emissions should be available to the public on daily bases. Extra pollution on daily bases from the 200 trucks on an already dangerous road is being discounted as, if is not here it will else where, when it will add hugely to the pollution. I highly doubt that your employees will be stopping and reporting any suspect lorries spewing out pollution.</i>	<p>The measures taken by the Applicant to consult the public on the proposals is set out in the <b>Consultation Report (Doc Ref 6.1)</b>.</p> <p>The Proposed Development does not involve any changes to emissions compared to the Consented Scheme, nor the way those emissions are monitored and/or reported.</p> <p>The Proposed Development does not involve any additional vehicle trips compared to the Consented IWFM. It is a requirement of the IWFM TCPA Permission (condition 5) that a written record of daily heavy goods vehicle movements is kept and supplied to the Waste Planning Authority within 14 days of a written request.</p>	No change.
45.	<i>It is incredible [sic] disingenuous to offer a diagram of your plant with no indication of which pollutants will be expelled from it. Furthermore there is no indication of carbon capture and storage within the plant which could significantly decrease your emissions. Your representative mentioned hydrogen plants in Ireland working towards hydrogen fuel and the 200</i>	The Proposed Development seeks only to increase the electrical generating capacity of the Consented Scheme. The inclusion or otherwise of carbon capture storage is therefore beyond the scope of this DCO application, as are references to hydrogen fuel and electricity- and hydrogen-fuelled vehicles.	No change.

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	<p><i>trucks coming through working towards being electric or fuelled by safe hydrogen fuel? Are you finding research to contain gases in safe containers? The representative should also be briefed on manners. He continuously interrupted people avoiding detailed questions - especially women - and claimed to be confused as he had refused to listen. The only let people finish talking when told rapidly to be quiet whilst locals were talking. Furthermore, multiple locals have requested more transparency. We should be able to access the emissions reports in plain language rather than with lots or inaccessible jargon. We would also like to be able to view the real time emissions monitoring (as you will be able to see us in the control room) on a dedicated ,easily accessible web page, once the plant is operational</i></p>	<p>An <b>ES Non-technical summary (Doc 6.3)</b> is provided to help explain the likely environmental effects of the Proposed Development in as straightforward a way as possible.</p> <p>The Proposed Development does not involve any changes to emissions compared to the Consented Scheme, nor the way those emissions are monitored and/or reported.</p> <p>A description of the proposals is provided in <b>ES Volume 1, Chapter 3: Proposed Development and Construction (Doc Ref 6.1)</b>.</p>	
46.	<p><i>You are not giving the pollution figures in a way that matters to us. Collectively we have pollutions from A120, A12, Quarry and new incinerator. A lack of real time monitoring the public to see 24/7 of the total pollution.</i></p>	<p>The Proposed Development will not lead to any changes to air quality compared to the Consented IWMF.</p> <p>The Planning Inspectorate's <b>Scoping Opinion (ES Volume 3, Appendix 5.2 (Doc Ref 6.1))</b> agreed that an assessment of air quality effects could be scoped out of the environmental impact assessment for this reason.</p>	No change.
47.	<p><i>Very interesting presentation. Supportive of Site as a safe way to process residual waste with the added benefit of energy from waste</i></p>	<p>The Applicant notes the response and thanks the member of the public.</p>	No change.
48.	<p><i>I support the proposal waste we develop too technical for me to really understand how it works, but care seems to have been thought through thoroughly.</i></p>	<p>The Applicant notes the response and thanks the member of the public.</p>	No change.
49.	<p><i>The presentation was well presented easy to understand. Questions were welcomed and answered well.</i></p>	<p>The Applicant notes the response and thanks the member of the public.</p>	No change.
50.	<p><i>Putting good use from the "mechanics" of the Site</i></p>	<p>The Applicant notes the response and thanks the member of the public.</p>	No change.
51.	<p><i>Valid proposal- very well informed prospect</i></p>	<p>The Applicant notes the response and thanks the member of the public.</p>	No change.

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52.	<i>This was much needed event that provided clarity of issues .It appears that this proposal has the potential to reduce significantly the need of landfill and the amount of greenhouse gasses, as such it is worthy of refined consideration. This really is a very complex issue and the science and the technology must be allowed to lead.</i>	The Applicant notes the response and thanks the member of the public.	No change.
53.	<i>You have my full support. Just what Essex needs to tackle climate crisis.</i>	The Applicant notes the response and thanks the member of the public.	No change.
54.	<i>Whilst supporting the need of environmental positive solution to waste management, It is disappointing that the location is a place of natural beauty.</i>	The Applicant notes the response and thanks the member of the public.	No change.
55.	<i>if the incinerator must be build in location, it seems only possible that it should be built as efficiently as possible. Regarding communication, using local village Facebook groups as well as leafleting residents are the most direct way to contact, other than updating Parish Councils How the energy taken will be managed and utilised.</i>	The Applicant notes the response and thanks the member of the public.  Information on the grid connection is provided in <b>ES Volume 1, Chapter 2: Existing Site Conditions and Consented Scheme (Doc Ref 6.1)</b> .	No change.
56.	<i>Dear Sir, The proposal is very likely to general considerable additional daily commercial vehicle traffic movement, both off and onto the A120 at Bradwell, Essex. This is a road National Highways described as "over capacity". To resolve this dilemma, we suggest that IWMF processing operations only comments when A120 road network is capable of satisfactorily coping with the project increases in traffic volumes. This for a moment, of the effects on the village of Bradwell and surrounding countryside, so this should be an aspect to consider for DCO. Yours faithfully [Name of Consultee] Planning Kelvedon of Feering Heritage Society [sic]</i>	Please refer to the response to comment no. 13 and 27.	No change.

