

Indaver Rivenhall IWMF DCO

Planning Act 2008

Infrastructure Planning (Applications: Prescribed Forms and Procedure)

Regulations 2009

**Examination Documents [PINS Ref:  
EN0101038]**

# Relevant Representations Report

**Document Reference: EN0101038/APP/9.1.3**

**Revision Number 1.0**

**APFP Regulation 5(2)(q)**

07 May 2024

Indaver Rivenhall Ltd

Leading the field in  
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# 1 Executive Summary

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- 1.1 The purpose of this Report (Document Ref. 9.1.3) is to provide a response to the key issues raised in relevant representations submitted by Interested Parties in relation to the application for a Development Consent Order ('DCO') to extend the generating capacity of the Rivenhall Integrated Waste Management Facility ('IWMF').
- 1.2 A total of thirteen relevant representations were received by the Examining Authority prior to the close of relevant representation period on 20<sup>th</sup> February 2024. At the discretion of the Examining Authority, a late submission made by Natural England was accepted which we are treating as a relevant representation, making the total number of representations 14.
- 1.3 Of these 14 representations:
  - two were submitted by the host local authorities (i.e. Braintree District Council and Essex County Council);
  - two were submitted by Parish Councils;
  - three were submitted by other statutory consultees, and;
  - seven were submitted by members of the public, landowners, businesses and non-statutory organisations.
- 1.4 All representations can be found on the Planning Inspectorate's website here. All representations have been triaged and responses to Interested Parties are provided in Appendix A of this document, with the exception of the representations from Braintree District Council and Essex County Councils. Instead, the matters raised by them are addressed through a Statement of Common Ground ('SoCG') with those parties (Document Ref. 8.1).
- 1.5 This Report is structured as follows:
  - **Section 2** sets out the introduction and structure of this Report.
  - **Section 3** Interested Parties who have made a relevant representation, including Parish Councils, statutory consultees, interested groups and individual members of the public.
  - **Appendix A** provides the Applicant's response to relevant representations made by Interested Parties not covered by a SoCG.

## 2 Introduction

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### Overview

- 2.1 This Report (Document Ref. 9.1.3) has been prepared on behalf of Indaver (the ‘Applicant’). It provides thematic responses to the issues raised in relevant representations submitted by Interested Parties in relation to the Rivenhall Integrated Waste Management Facility (‘IWMF’) Project’s Development Consent Order (‘DCO’) Application.
- 2.2 The Applicant is seeking development consent for an extension of the generating capacity of the Rivenhall IWMF to enable electrical generating capacity.
- 2.3 Registration of the Interested Parties and submissions of relevant representations opened on 8<sup>th</sup> January 2024 and closed on 20<sup>th</sup> February 2024. The Examining Authority used its discretion to accept a late representation from Natural England on the 29<sup>th</sup> February 2024.
- 2.4 A total of 14 relevant representations were submitted by Interested Parties. Of these:
- two were submitted by the host local authorities (i.e. Braintree District Council and Essex County Council);
  - two were submitted by Parish Councils;
  - three were submitted by other statutory consultees, and;
  - seven were submitted by members of the public, landowners, businesses and non-statutory organisations.
- 2.5 All of the relevant representations are put into one of three categories;
- **Category 1:** Statement of Common Ground (SoCG) Parties (i.e. Essex County Council [[RR-002](#)] and Braintree District Council [[RR-001](#)]). Matters raised by each local authority are addressed directly in the joint SoCG submitted at Deadline 1 (Document Ref. 8.1).
  - **Category 2:** Other Individual and Technical Stakeholders. Refer to **Section 3** and Tables 1 and 2 of **Appendix A** for details.
  - **Category 3:** Other Interested Parties (i.e. members of the public and interest groups). Refer to **Section 3** and Table 3 of **Appendix A** for details.
- 2.6 A full list of all the relevant representations received can be found on the Planning Inspectorate’s website ([here](#)). The Examining Authority has allocated a reference number to each Interested Party that submitted a relevant representation. These references have been used throughout this Report where relevant, to allow cross-referencing.

### Structure of this Document

- 2.7 This Report provides a response from the Applicant to the matters raised in relevant representations and is structured as follows:

- **Section 3** Interested Parties who have made a relevant representation, including Parish Councils, statutory consultees, interested groups and individual members of the public.
- **Appendix A** provides the Applicant's response to relevant representations made by Interested Parties not covered by a SoCG.

# 3 Responses to Individual and Technical Stakeholders

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3.1 This section lists the Interested Parties who submitted a relevant representation, along with a link to their representation, with the exception of those of which the Applicant is seeking to enter into a SoCG with (i.e. Braintree District Council and Essex County Council). They are as follows:

## Category 2 – Individual and Technical Stakeholders

### a. Parish Councils

- I. Bradwell with Pattiswick Parish Council [[RR-004](#)]
- II. Kelvedon Parish Council [[RR-007](#)]

### b. Interested Groups and Statutory Consultees

- I. Anglian Water Services Ltd [[RR-003](#)]
- II. East of England Ambulance Service NHS Trust [[RR-005](#)]
- III. UK Health Security Agency [[RR-008](#)]
- IV. Natural England [[AS-001](#)]

## Category 2 – Other Interested Parties

### c. Other Interested Parties

- I. Ener-Vate Consultancy Limited [[RR-006](#)]
- II. George Edward Nicholls [[RR-010](#)]
- III. Lisa Cracknell [[RR-011](#)]
- IV. Mike Appleton [[RR-012](#)]
- V. Paul Richard Thorogood [[RR-013](#)]
- VI. United Kingdom Without Incineration Network [[RR-009](#)]

# Appendix A – Responses to Interested Parties

Table 1 - Parish Councils

Topic	Summary of the Position of the Interested Party	Indaver’s Response to the Relevant Representation
<b>Bradwell with Pattiswick Parish Council [RR-004]</b>		
Other	As Parish Clerk, and following a full Parish Council meeting held on 12 February 2024, I am writing to note that the Parish Council has "no objections" to application reference EN010138.	We would like to thank Bradwell with Pattiswick Parish Council for their response. We note they do not object.
<b>Kelvedon Parish Council [RR-007]</b>		
Other	Kelvedon Parish Council wish to know if this application, should it be granted, will preclude Local Government decision making in the future, if this goes onto become a national, significant, infrastructure project. Does this take future decision making from local to national level?	Local Government – in this case ECC - will not be precluded from future decision making on planning matters related to the IWMF. Article 6(1), Part 2 of the <b>Draft Development Consent Order [APP-013]</b> states that the planning permission issued by ECC pursuant to the Town and Country Planning Act 1990 for the development of the Rivenhall IWMF and the requirements set out shall continue to apply to the carrying out of the authorised development and to the operation of the extended generating station. ECC will remain the primary decision maker for planning matters as they relate to the construction and operation of the IWMF. This applies to future planning applications or applications for approval of details submitted either before or after the making of a Development Consent Order.

		Further information is set out in paragraphs 3.10 and 3.11 of the <b>Explanatory Memorandum to the Draft Development Consent Order</b> [ <a href="#">APP-014</a> ].
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Table 2 – Other Individual and Technical Stakeholders

Topic	Summary of the Position of the Interested Party	Applicant's Response to Relevant Representation
<b>Anglian Water Services Ltd [RR-003]</b>		
Operations	Anglian Water has provided a water connection to Indaver (Rivenhall) Ltd, under the consented scheme and a water supply tariff has been secured through a water retailer. We advise that if additional non-domestic water resources are required to operate the facility in the future, that the applicant engages with Anglian Water at the earliest opportunity.	<p>These comments are noted. The Proposed Development does not involve any additional non-domestic water resources.</p> <p>The principle of future engagement with Anglian Water is noted and agreed.</p>
Operations	Furthermore, the Environmental Statement also confirms that there is no discharge of processed water or trade effluent from the facility, and therefore no connections to accommodate trade effluent flows are required to our drainage network. Anglian Water therefore is content there are no outstanding matters with regard to the proposed project, insofar as the position on water and drainage is presented in the Environmental Statement Non-Technical Summary.	We would like to thank Anglian Water Services Ltd for their comments. We note that they do not object to the proposals.



<p>Construction</p>	<p>The principal components of the IWMF project as a whole as outlined in the Planning Statement (document ref EN0101038/APP/7.1) are summarised below:</p> <ul style="list-style-type: none"> <li>▪ Anaerobic Digestion Plant treating mixed organic waste, producing biogas converted to electricity through biogas generators;</li> <li>▪ Materials recovery facility for mixed dry recyclable waste to recover materials comprising paper, plastic &amp; metals;</li> <li>▪ Mechanical biological treatment facility for the treatment of residual municipal, commercial &amp; industrial wastes to produce a solid recovered fuel;</li> <li>▪ De-inking &amp; pulping paper recycling facility to reclaim paper;</li> <li>▪ Combined heat &amp; power plant utilising solid recovered fuel to produce electricity, heat &amp; steam;</li> <li>▪ Extraction of minerals to enable buildings to be partially sunken below ground level with resulting void;</li> <li>▪ Visitor/ education centre;</li> </ul>	<p>The summary of works set out by EEAST is accurate insofar as these are works that benefit from planning permission issued by ECC for the development of the IWMF. However, it must be noted that none of the components set out by EEAST are being applied for as part of this DCO application.</p> <p>The construction phase works are in progress, with the works being carried out pursuant to the Consented Scheme and not as a result of the proposals contained in this DCO application. Rather, the authorised development for which consent is sought is limited to one of two works, which are set out in Paragraph 1(a) and 1(b) of Schedule 1 of the <b>Draft Development Consent Order [APP-013]</b>.</p> <p>The need for large-scale plant, equipment and specialised machinery are all related to the construction of the IWMF as permitted by the extant planning permission, the effects of which have been considered and appropriate mitigation put in place through the planning process. No abnormal indivisible loads (AILs) are required to carry out the authorised development.</p>
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	<ul style="list-style-type: none"> <li>▪ Extension to existing access road;</li> <li>▪ Provision of offices &amp; vehicle parking;</li> <li>▪ Associated building &amp; engineering works, stack (35m high) &amp; storage tanks;</li> <li>▪ Landscaping, planting &amp; bunding works.</li> </ul> <p>A significant level of construction phase work involving large-scale plant, equipment and specialised machinery deployment/ use, engineering operations, material arisings/ deposition, import of construction material and associated HGV movements is considered likely, leading to the potential for construction phase accidents. In addition, the haulage required to transport the componentry associated with the large-scale and specialist plant outlined in the Illustrative Plan (Document ref EN0101038/APP/2.6) is likely to require the use of Articulated Indivisible Loads (AIL's).</p> <p>EEAST's principal areas of interest relate to the IWMF DCO Application and implementation of the works consented by PP ESS/34/15/BTE, linked to construction phase accidents and traffic and transport impacts associated with planned AIL movements.</p>	
Construction	<p>In combination with the works consented by Planning Permission (PP) ESS/34/15/BTE, the construction phase of the IWMF is considered to give rise to impacts on EEAST's service capacity incorporating its staff, vehicle fleet and estate assets.</p>	<p>There would be no additional impacts on EEAST's service as a result of the Proposed Development to which this DCO application relates. Furthermore, where there are controls on construction activities related to the Consented Scheme, these will apply and be adhered to while carrying out the authorised</p>

		development to which this Proposed Development relates.
Other	It is therefore requested that Indaver Rivenhall Limited (IRL) and EEAST voluntarily adopt a set of cooperation arrangements, to address EEAST’s principal points of interest associated with the IWMF as a whole.	<p>Paragraph 4.1.18 of the Overarching National Policy Statement for Energy (EN-1) states that any obligations that an applicant agrees with local authorities must be ‘<i>relevant to planning, necessary to make the proposed development acceptable in planning terms, directly related to the proposed development, fairly and reasonably related in scale and kind to the proposed development, and reasonable in all other respects</i>’. It is considered that any such cooperation arrangement with EEAST would fail to meet at least one, if not all, of these tests hence the need for the arrangement to be voluntary and outside of the usual planning obligation framework.</p> <p>For the reasons set out above – namely that the DCO would not give rise to any additional effects compared to the Consented Scheme - no such voluntary arrangement is considered necessary.</p>
Construction	HSE’s construction statistics and publications for Great Britain indicate that work related incidents, involving serious injury and fatalities, are statistically significantly higher for the construction industry as compared to the ‘all industry’ rate. In the event of a construction phase accident or incident, appropriate procedures would need to be put in place for emergency access, on-site triage, medical assessment and patient identification, stabilisation and transfer to an appropriate healthcare setting. Plans and contingencies are therefore required for emergency access, on-site triage, medical assessment, patient identification,	The carrying out of the authorised works for which development consent is being sought involve relatively minimal construction activity. <b>Chapter 3 of the Environmental Statement, Volume 1 (APP-028)</b> details the construction activities associated with the Proposed Development. Robust safety measures and procedures are already in place for the construction activities that are being carried out pursuant to the Consented Scheme. The carrying out of the authorised works would not give rise to any materially greater risk of major accidents, hazards or

	<p>stabilisation, clinical information, safe and efficient handover to EEAST responders within operationally optimal attendance times - which in urgent cases may require Helicopter Emergency Medical Services (HEMS) access. The incidence of any potentially significant or major accident would impact on EEAST and its HEMS partner operational capacity, efficiency and resources, including EEAST hazardous area response teams – HART, as appropriate. It is considered that such scheme impacts could be addressed by appropriate mitigation and management measures being implemented via a voluntary cooperation agreement with IRL</p>	<p>disasters compared to the Consented Scheme. For this reason, an assessment of such was agreed with the Planning Inspectorate to be scoped out of the EIA. This is as set out Table 3.3 (ID 3.3.16) of the <b>Planning Inspectorate Scoping Opinion (ES Vol. 2, Appendix 5.2 (APP-040))</b>.</p>
Traffic and Transport	<p>AIL movements have the potential to impact on EEAST's operational capacity, efficiency and resources. Advanced Notification concerning the nature, frequency, route management, reliance on police escort and expected time delays associated with AIL movements, would assist EEAST in managing these impacts. It is considered that such scheme impacts could be addressed by appropriate mitigation and management measures being implemented via a voluntary cooperation agreement with IRL</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 IWWMF TCPA Permission. No AIL movements are required to carry out the Proposed Development. The Proposed Development would not require any additional employees at the IWWMF site either. Therefore, there would be no changes to the daily number of vehicles entering and exiting the IWWMF site during operation. For this reason, the assessment of traffic and transport impacts was agreed to be scoped out of the EIA. Please refer to Table 3.3 of the <b>Planning Inspectorate Scoping Opinion (ES Vol. 2, Appendix 5.2 (APP-040))</b> for confirmation of this.</p>
Construction / Traffic and Transport	<p>EEAST's principal points of interest arising from the IWWMF DCO Application and implementation of the consented works (PP ESS/34/15/BTE) relate to construction phase accidents, and traffic and transport impacts associated with planned AIL movements. Whilst it is acknowledged that the consented works fall outside the remit of the DCO</p>	<p>The Proposed Development comprises only internal works within the building envelope of the Consented Scheme, to be undertaken by qualified engineers. No AIL movements are required to carry out the Proposed Development.</p>

	<p>Application and could not validly form part of a ‘DCO Requirement’, it is requested that ‘voluntary cooperation arrangements’ are instigated between IRL and EEAST - in order to mitigate and manage any such impacts arising on EEAST’s service capacity</p>	
<p>Construction</p>	<p>Drawing on EEAST’s engagement experience with other Nationally Significant Infrastructure Projects (NSIP’s) the following measures are therefore sought;</p> <ul style="list-style-type: none"> <li>▪ An Emergency Plan to be prepared by the Construction Works Main Contractor in liaison with EEAST, as part of a Code of Construction Practice, as appropriate, incorporating the following:</li> <li>▪ A Protocol &amp;/or checklist Procedure for construction phase accidents/ injuries requiring EEAST or Air Ambulance tasking - with plans &amp; contingencies for emergency access, on-site triage, medical assessment, patient identification, stabilisation &amp; transfer to an appropriate healthcare setting via land/air ambulance; This would also assist any coordinated response required from health &amp; blue light partners, incorporating the Essex Police &amp; Essex Fire &amp; Rescue Service;</li> <li>▪ Advanced Notification procedures for Articulated Indivisible Loads;</li> <li>▪ Inclusion on the mailing list for information/ minutes arising from the quarter year meetings of the Rivenhall IWMF Site Liaison Group. EEAST consider that it would be helpful for reference to</li> </ul>	<p>EEAST’s comments are noted and the service they provide is recognised as vital. However, it is considered that in this instance, for the reasons set out above, no further measures are necessary to mitigate impacts associated with the Proposed Development. The Applicant’s main contractor for the delivery of the Consented Scheme – Hitachi Zosen Inova (‘HZI’) – are already in the process of carrying out the Consented Scheme and are doing so pursuant to an <b>Emergency Preparedness and Response Plan (Doc Ref 9.1.5)</b> that is a condition of the contract.</p> <p>The Applicant is happy to add EEAST to the mailing list for information/minutes arising from the quarterly Site Liaison Group meetings.</p> <p>Given the above, it is not considered necessary to enter into a Statement of Common Ground, nor to enter into a formal Voluntary Cooperation Arrangement with EEAST.</p>

	Voluntary Cooperation Arrangements to be made in a Statement of Common Ground to assist the DCO Examination process.	
Cumulative Impacts	The Application in combination with the implementation of works consented by Planning Permission ESS/34/15/BTE, are considered to give rise to impacts on EEAST's service capacity incorporating its staff, vehicle fleet and estate assets.	There are no impacts arising from the authorised development for which the DCO application seeks consent that would have significant impacts on EEAST's service capacity.
Other	Whilst the consented works fall outside the remit of the DCO Application and could not validly form part of a 'DCO Requirement', it is requested that Voluntary Cooperation Arrangements are instigated between IRL and EEAST - in order to mitigate and manage impacts arising on EEAST's service capacity.	As above.
<b>UK Health Security Agency [RR-008]</b>		
Environmental Impacts and EIA	Thank you for your consultation regarding the above development. The UK Health Security Agency (UKHSA) welcomes the opportunity to comment on your proposals at this stage of the project. Please note that we request views from the Office for Health Improvement and Disparities (OHID) and the response provided is sent on behalf of both UKHSA and OHID. We can confirm that: We note that the developer has scoped out at the earlier stage all issues that could potentially been a concern in terms of impacts on human health. With respect to Registration of Interest documentation, we are reassured that earlier comments raised by us on 21st August 2023 have been considered. In addition, we acknowledge that the Environmental Statement (ES) has not identified any issues which could significantly	Noted. We would like to thank UK Health Security Agency for their response. We note they do not object.

	affect public health. Following our review of the submitted documentation we are satisfied that the proposed development should not result in any significant adverse impact on public health.	
Other	On that basis, we have no additional comments to make at this stage and can confirm that we have chosen NOT to register an interest with the Planning Inspectorate on this occasion. Please do not hesitate to contact us if you have any questions or concerns.	
<b>Natural England</b>		
Other	Natural England do not appear to have had any previous engagement relating to the current application. We note, however, that not only does the site benefit from an existing permission which is currently under construction but that the Environmental Statement contests that: “The Proposed Development will only comprise engineering works carried out internally within the consented IWWMF building. There will be no changes to the external appearance of the IWWMF, and no additional throughput of waste is required to achieve the uplift. This means that there would be no associated increase in emissions or vehicle movements (associated with the delivery of waste to the IWWMF Site).” Further to this Natural England notes the location of the site and the distance to any of the statutory nature conservation sites which would be of primary concern to us. We therefore consider that the development is of low risk and do not wish to be involved in further stages of the NSIP process. Should your authority disagree with this conclusion please use the contact details set out below to raise your concerns. If the applicant is seeking a statement of common ground or letters of no impediment relating to protected species then	Noted. We would like to thank Natural England for their response. We note they do not object.

	these can be secured through our discretionary advice service.	
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Table 3 - Other Interested Parties

Topic	Summary of the Position of the Interested Party	Indaver's Response to Relevant Representation
<b>Ener-Vate Consultancy Limited [RR-006]</b>		
Climate Change and GHG / Other	As a resident of Essex and working for a national heat network consultant, I noted that the project is proposing the development of a large waste facility with adjoining energy centre and from the proposals the heat generated are significant, which offers a great opportunity for a low-zero carbon heat network. Passionate about Essex and wanting to support the development of a low-zero carbon heat network in the area to provide energy security, and low cost heating to the community, Ener-Vate can support on the discharging requirement of exporting heat. Considering the recently published consultation for heat network zoning proposals, it would be imperative to understand how this facility will align with proposed legislation and futureproof the facility.	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 can be directed through the turbine generator rather than directly recirculated via a bypass valve. In doing so, it would allow the IWMMF to generate a greater amount of electricity without the need for additional throughput of fuel, thereby helping displace the need for energy that is derived from fossil fuels. This is in accordance with the aim of working towards achieving the UK's legally binding target to reach net zero by carbon emissions by 2050.
<b>George Edward Nicholls [RR-010]</b>		
Operations	I objected to the original application. I then objected to the application to reduce the stack height because of potential increased ground level toxicity. However, I do not object to this application, indeed support the proposal to make the operation more efficient. The current approval is for 49.9	These comments are noted and we would like to thank you for the support. We agree that the Proposed Development will make an important contribution to the decarbonisation of the UK energy grid and reaching net zero by 2050.



	MW. According to the submission documents it should be possible, through better efficiency, to achieve something between 60 and 65MW. This represents an increase of about 27.5%, which seems very desirable, especially as it is stated that this can be achieved from the current material import allowance, through more efficient use of the burners.	
Traffic and Transport	However, it is your responsibility as the regulating authority to ensure: • no increase in traffic movements or timings (there have been no improvements in highway infrastructure, nor have the plans for the A120 improvement been progressed);	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. Therefore, there would be no changes to the daily number of vehicles entering and exiting the IWMF site during operation.
Climate Change and GHG	that the proposed efficiency will not result in more or different emissions which might impact on toxicity in the likely plume ground level receiving area (which, as I said with my previous objection, will be a more concentrated area as result of the lower stack height)	The Proposed Development does not involve any changes to the amount or type of waste. For these reasons, emissions from the stack will not change as a result of the Proposed Development. The treatment of flue gases will remain as per the Consented Scheme. The only change is to where steam generated is directed. It is for these reasons that the Planning Inspectorate agreed that an assessment of air quality effects arising from the Proposed Development could be scoped out of the EIA. Please refer to the <b>Planning Inspectorate Scoping Opinion (ES Vol. 2, Appendix 5.2 [APP-040]</b> for confirmation of this.
Planning Policy	As a consequence of granting approval, assuming you so determine, the scheme will become a Nationally Significant Infrastructure Project. You should consider whether this would make it easier for the operators to obtain variations to the operating restrictions. Or, to view it the other way,	Thank you for comments. In regard to whether it will be easier for operators to obtain variations to operating restrictions please refer to the response provided to Kelvedon Parish Council (RR-007).

	<p>why did the applicants seek approval for 49.9MW if they were able to achieve a higher figure?</p>	<p>Planning permission for the IWMF was granted in 2010 by the Secretary of State. 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.</p>
<b>Lisa Cracknell [RR-011]</b>		
<p>Air Quality</p>	<p>Concerns re pollution to local areas</p>	<p>The Proposed Development does not involve any changes to the amount or type of waste. For these reasons, emissions from the stack will not change as a result of the Proposed Development. The treatment of flue gases will remain as per the Consented Scheme and the associated Environmental Permit issued by the Environment Agency (Permit Number EPR/FP3335YU; Variation Permit number EPR/FP3335YU/V002; and Transfer Permit number EPR/CP3906LP), with the only change being where the steam generated would be directed. It is for these reasons that the Planning Inspectorate agreed that an assessment of air quality effects arising from the Proposed Development could be scoped out of the EIA. Please refer to the <b>Planning Inspectorate Scoping Opinion (ES Vol. 2, Appendix 5.2 [APP-040]</b> for confirmation of this.</p>

Mike Appleton [RR-012]		
Health	Burning materials at incinerator plants produces toxic pollutants that can harm our health: Dioxin impacts your immune system and, in some cases, can even cause cancer. Hazardous ash can cause both short-term effects (such as nausea and vomiting) to long-term effects (like kidney damage and cancer). Greenhouse gas emissions from incinerators and other sources like diesel and petrol vehicles contribute to respiratory disease.	The Proposed Development will not give rise to any additional emissions compared to the Consented Scheme. The operation of the Consented Scheme's emissions are controlled by the Environment Agency (Permit Number EPR/FP3335YU; Variation Permit number EPR/FP3335YU/V002; and Transfer Permit number EPR/CP3906LP). The Environment Agency has a statutory role to, amongst other things, protect human health from all processes and activities it regulates. The Environment Agency concluded that potential emissions of pollutants from the IWMF are <i>'unlikely to have an impact upon human health'</i> .
Paul Richard Thorogood [RR-013]		
Planning and Policy	I am the Essex county councillor for the Braintree Eastern division and the Rivenhall Airfield IWMF site sits on the boundary of my division together with the Witham North division. On the face of it, the application to increase the electricity output to 50MW+ while not increasing the amount of waste that is incinerated seems a positive measure, many of the residents that I represent do have two main concerns and they are 1. If the DCO is granted and the site becomes a Nationally Significant Infrastructure Project (NSIP) will the decision-making process about any future planning applications relating to this site be taken out of the hands of Essex County Council and be decided by government departments?	<p>Thank you for the comment and your support for the principle of increasing energy generation.</p> <p>In regard to the role of Essex County Council in future planning applications, please refer to the response provided to Kelvedon Parish Council (RR-007).</p>
Operations	The IWMF currently has permission to process 850,000 tonnes of waste per year but only permission to incinerate	No. The limit on the quantum of waste is controlled by the Environmental Permit issued by the Environment

	595,000 tonnes. If the DCO is granted will Indaver be able to divert some or all of that unused tonnage (previously designated for paper pulping, bio food waste, recycling) to incineration?	Agency (Permit Number EPR/FP3335YU; Variation Permit number EPR/FP3335YU/V002; and Transfer Permit number EPR/CP3906LP) which requires that that maximum annual waste throughput for the incineration of waste does not exceed 595,000 tonnes per annum. The DCO would not change this.
Other	And lastly, I would like to apply for an DCO NSIP grant to provide air quality monitoring equipment to measure the ambient air quality in the communities within 3-5km of the incinerator site, including Coggeshall, Kelvedon, Feering, Silver End, Stisted, Bradwell, north Witham and east Braintree. I have spoken to a university who would be happy to process the data and the air quality monitoring equipment would cost in the region of £50-80k; I hope that is something that can be considered because I think it is very important that local communities can assured that the ambient output from the incinerator is safe.	These comments are noted. Regarding the safety of the IWMF and its operation, please refer to the response made to RR-012.  Regarding monitoring, the Environmental Permit issued by the Environment Agency requires continual monitoring of the main pollutants and periodical monitoring of other substances. That monitoring data is then required to be provided to the Environment Agency for them to assess and confirm compliance with the established limits of each pollutant.
<b>United Kingdom Without Incineration Network (UKWIN) [RR-009]</b>		
Climate Change and GHG / Need	UKWIN wishes to register as an interested party to this NSIP Examination, as we believe that the Applicant has overstated benefits and understated disbenefits of their proposal, e.g. with respect to climate change impacts and to the need for this new incineration capacity, especially in light of the EfW overcapacity concerns enshrined in EN-1 (2024) and EN-3 (2024)	The Proposed Development does not comprise any increase in the capacity of the Consented Scheme. The amount of waste throughput 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

		<p>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.</p>
Other	<p>UKWIN is interested to learn about any differences between the scheme that could be brought forward under the existing planning permission and the scheme now being proposed as an NSIP, apart from the proposed increase in electrical output.</p>	<p>The authorised development for which development consent is sought is set out in Schedule 1 of the <b>Draft Development Consent Order [APP-013]</b>. No other changes to the Consented Scheme are proposed via this DCO application – it is only the electrical output capacity that will change.</p>

