

Braintree District Council

Written summary of oral submissions made at Issue Specific Hearing 1

Application by Indaver Rivenhall Ltd for an Order Granting Development Consent for the proposed extension of generating capacity of the Rivenhall Integrated Waste Management Facility.

Hearing 4th June 2024

Deadline 4

Please find below Braintree District Council's response to the Examining Authority's Second Written Questions and proposed Schedule of changes to the draft Development Consent Order, both published on the 25th June 2024.

1. Examining Authority's Second Written Questions

Question 2.2.1

Both ECC and BDC are of the view that it is unclear what the climate change impact will be from the Proposed Development and how this will affect local carbon emissions. The Applicant set out at ISH1 [EV3-002] [EV3-003] that the carbon emissions of the consented scheme were assessed when it was originally consented. ECC and BDC, explain why the assessment undertaken for the consented scheme does not provide the information sought.

Braintree District Council response:-

Braintree District Council thanks the Applicant for their response – as debated at the meeting the Applicant has based its Climate Impact purely on

“the receptor for Greenhouse Gas emissions is the global atmosphere. Therefore the carbon assessment has compared the change in carbon emissions as a result of the proposed development with baseline emissions in the UK and Essex and also with the UK carbon budgets as a method of assessing their significance.”

*The climate impact of the consented scheme and the proposed development is based on “the change in carbon emissions with baseline emissions in the UK and Essex” whilst BDC recognises that the consented and proposed scheme will reduce the national carbon figures at a local level there will be a impact and BDC are unable to determine the level of impact that the site will result in as the Applicant has not included an estimate of the **actual** greenhouse gas at source emissions rather it purely relies on national displacement in its methodology. Whilst the 2014 A Carbon Based Modelling Approach - methodology is used elsewhere it does not provide the information that local and regional authorities need to establish the impact of the such*

a site on their Climate Change Strategies and Climate Change Action Plans of the both organisations.

Essex County Council and Braintree District Council have therefore no mechanism to estimate the impact that the consented and proposed development will have on the reported District/County greenhouse gas emissions.

In its December 2020 report, Achieving net zero, the National Audit Office (NAO) highlighted that local authorities would have a critical role to play in the achievement of net zero. (NAO, Achieving net zero, December 2020, para 11).

In its October 2021 report on Local government and the path to net zero, the Levelling Up, Housing and Communities (LUHC) Select Committee also said local authorities had a “critical” role to play in achieving net zero:

many of the funds allocated to climate action, such as those aimed at improving the energy efficiency of the existing housing stock and encouraging more sustainable modes of travel, are delivered through local authorities.

The Climate Change Committee (CCC) has said that local authorities have powers or influence over roughly a third of emissions in their local area. However, the Government has argued that 82% of the UK’s emissions are “within the scope of influence of local authorities”.

In its October 2021 Net Zero Strategy: Build Back Greener, the Government set out how it intended to decarbonise “all sectors of the UK economy to meet our net zero target by 2050”.²⁵ In the strategy, it said that “devolved and local government play an essential role in meeting national net zero ambitions”: Not only does local government drive action directly, but it also plays a key role in communicating with, and inspiring action by, local businesses, communities, and civil society. [...] Local government decides how best to serve communities and is best placed to integrate activity on the ground so that action on climate change also delivers wider benefits – for fuel poor households, for the local economy, for the environment and biodiversity, as well as the provision of green jobs and skills.

As highlighted above local authorities have a “critical” role to play in achieving the national 2050 net zero target. It is therefore essential that BDC and ECC have a full understanding of the local impact of the consented and proposed development without this we are unable to offer any form of climate mitigation.

Inspector’s Question 2.2.2

BDC has set out [REP3-013] that it will reply to points raised by the Applicant on methodological matters at ISH1 [EV3-002] [EV3-003] at Deadline 4. Given the short time remaining in the examination, please provide this information in reply to this question.

Braintree District Council Response

Braintree District Council accepts the Applicants response in relation to use of the 0.371t Co2e'MWH is appropriate for the proposed development based on the Applicants response in 3.12-3.14

The Examining Authority's proposed changes to the draft Development Consent Order (DC1) published on the website on the 25th June.

Braintree District support the Inspector's proposed alterations shown against DC1.3.1.1 a) and b) which limit electricity generation to 65MW for the reasons set out in the response of Essex County Council in REP3- 017.

Other

Noise

Braintree District would reiterate that it does not seek to duplicate the work of Essex County Council in assessing noise impacts, but would urge that Essex County Council is supplied with such information as it requires, to allow it to come to a view on this issue.