

APPENDIX CRR

Table of responses to Section 42 consultation held between 26 October 2020 and 14 December 2020, replies from the applicant and how the applicant has taken account of the issues raised in preparation of the final application and Environmental Statement.

PINS project reference: WS010005

PINS document reference: 4.2.18

Table ES2.2

Summary of the comments on the PEIR and pre-submission consultation from the Section 42, Section 43 and Section 44 consultees and the responses from the applicant

S42 consultee	Summary of the key comments on the PEIR.	Responses to the key comments and issues
Health and Safety England	<p>According to HSE's records there are no major accident hazard sites but there is one major accident hazard pipeline within the proposed DCO application boundary of the East Northants Resource Management Facility for this nationally significant infrastructure project. The major accident hazard pipelines is:</p> <p>1)HSE ref 6909, operated by National Grid PLC; 2 Feeder A47(T) / Duddington</p> <p>The presence of hazardous substances on, over or under land at or above set threshold quantities (Controlled Quantities) will probably require Hazardous Substances Consent (HSC) under the Planning (Hazardous Substances) Act 1990 as amended. The substances, alone or when aggregated with others for which HSC is required, and the associated Controlled Quantities, are set out in The Planning (Hazardous Substances) Regulations 2015 as amended. HSC would be required to store or use any of the Named Hazardous Substances or Categories of Substances at or above the controlled quantities set out in Schedule 1 of these Regulations.</p>	<p>Augean is aware of the high pressure gas transmission pipeline (FM02 Wisbech NW to Duddington) which crosses the southern section of the proposed western extension in an east to west direction. The pipeline will not be disturbed or covered.</p> <p>The proposed landfill areas to the south and north of the gas pipeline will be developed as separately constructed, fully contained landfill areas with suitable stand off distances from the gas pipeline as agreed with the pipeline authority. The standoffs are secured under Requirement 3 of the draft DCO (PINS document reference 3.1) Augean has consulted with National Grid regarding the proposed development and have agreed in principle the necessary safety provisions.</p> <p>The proposed development is for a waste landfill site and a waste treatment and recovery plant. With respect to the landfill site, as specified in Regulation 4, Schedule 2(6) hazardous waste deposited in a landfill site does not require Hazardous Substances Consent. The activities at the waste treatment plant do not meet the thresholds for the requirement of a Hazardous Substances Consent.</p> <p>Following receipt of the consultation response from The Health and Safety Executive Augean has reviewed further the types and quantities of waste associated with the treatment operations at the site and confirm that the proposed change to the operations will not result in a need for the site to obtain a Hazardous Substances Consent under The Planning (Hazardous Substances) Regulations 2015.</p>

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Buckinghamshire Council	The management of hazardous waste and LLW outside of Buckinghamshire is consistent with the Council's overall net self-sufficiency principle for managing the totality of waste produced in the county. The Council's Minerals and Waste Local Plan 2019-2036 does though identify a potential need for hazardous waste recovery and treatment. This future provision is at low volumes (approximately 2,000tpa for treatment and 11,000tpa for recovery by 2036), which suggests management will continue to be met by facilities outside the county.	It is noted that there is currently no capacity for hazardous waste treatment and no active hazardous waste landfill sites within Buckinghamshire and that the majority of hazardous waste is exported to appropriate facilities outside of the county. LLW arising in Buckinghamshire is currently managed at appropriate facilities outside the county including at ENRMF.
	With reference to the 'approximate' areas shown on plans is this because the areas will be fixed after the consultation responses have been reviewed or is it intended that the areas will not be known at the point the application is submitted? If it is the later how will the Examining Authority be invited to consider the unknown aspects of the development and the application of the Rochdale principle?	The Preliminary Environmental Information Report was prepared for consultation on the proposals prior to the finalisation of the detailed design of the western extension area hence the term 'approximate' is used with respect to the DCO application boundary and internal site layout plans. As part of the application process the proposals and plans have been refined since the consultation to contain more detail where necessary. Where flexibility is necessary such as the layout of the waste treatment and recovery plant the Rochdale envelope principle is used and the maximum extent of the plant is used in the impact assessments. As the proposed development is a hazardous waste facility, a lot of the detailed design is controlled and secured under the Environmental Permits and must be approved by the Environment Agency.
	It is suggested that the traffic assessment should set out the origin and destination of waste vehicles and consider options including bulking waste to reduce the number of trips generated.	Between 2015 to 2019 2.81% of the hazardous waste landfilled at ENRMF came from the south east (including Buckinghamshire) and since 2016 only 2.90% of the LLW accepted at the site has arisen from Buckinghamshire. This limits the potential for the bulking of waste, however Augean reports that the majority of vehicles delivering waste to the site arrive with a

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		full or almost full payload either in tonnage terms or in volume terms when carrying lighter materials. It is the responsibility of the producer to transport the waste efficiently.
	Buckinghamshire would welcome confirmation that impacts on human health in the county have been de-scoped because other than transport – which is already taking place and regulated by the Environment Agency – those pathways are too distant to have an effect and be below the identified reasonable threshold for significant effects?	The potential impacts on human health as a result of the proposed development are assessed in full and the results are presented in Sections 12 and 26 of the Environmental Statement (ES) (PINS document reference 5.2). The operations at the site are and will continue to be the subject of Environmental Permits which are regulated by the Environment Agency. The Environmental Permits include emission limits which are protective of human health and the environment at the boundary of the site and therefore also are protective of human health and the environment at any greater distances from the site boundary. There is therefore no need to assess specifically the potential impacts on the health of the residents of Buckinghamshire as the distance from the site to Buckinghamshire is more than 60km at its closest point.
	With reference to paragraph 9.5.7 the Council asks that the Augean provide summary details of the site(s) in Buckinghamshire considered at the first stage shortlisting that identified 43 potential locations.	The list of sites in Buckinghamshire identified as potential alternative locations in the first stage shortlist is commercially confidential. The potential alternative suitable facilities were identified using a structured geographical search against a set of search criteria and there were no discussions with landowners at this early stage of the site search process.
Duddington and Fineshade Parish Council	<p>The Parish Council is concerned that the preferred option is to extend ENRMF to the west rather than to the south, as was suggested would be the case when the original planning application was made years ago.</p> <p>The Parish Council would again urge you to rethink the exact areas for your expansion, concentrating on the fields further south.</p>	<p>The consideration of alternative locations for the development is set out in Section 10 of the ES and includes consideration of expansion to the fields to the south of the existing site. As explained, extending the site to the south would result in the potential for a greater visual and landscape impact than development of the western area which is generally more contained and likely to result in a lower potential visual and landscape impact.</p> <p>Regardless of the impacts associated with development of the southern fields, the option has never been an alternative to the extension into the western fields, as the land is not, and will</p>

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		<p>not be for sale. This position has been reconfirmed by the landowner. The only viable extension to the site is the development of the land to the west for which Augean has an option agreement which will only be implemented once a Development Consent Order is in place. In the event the application is refused the land will continue to be used for commercial farming.</p> <p>The development and subsequent restoration of the site presents a realistic opportunity and the only way to fulfil what is Augean’s understanding of the ecological aspirations of creating connectivity between the woodlands in a relatively short period of the life of the site.</p>
	<p>The two fields that you have in mind would bring your facility right to the edge of Fineshade Wood and the boundary of our parish. Noise from the existing site negatively affects the tranquillity of the woodland, and the works provide a visual eyesore on our eastern horizon. Clearly, extending to the west would bring the facility to within 1.25km of residential properties in Duddington Village and 2.5km of cottages in Fineshade Wood.</p>	<p>It is acknowledged that tranquillity has the potential to be influenced by levels of light, noise, traffic and visual intrusion. An assessment of the impacts of noise, traffic, lighting and visual intrusion of the proposed development on the tranquillity of the area and the amenity of users of the woodlands to the west and footpaths in the vicinity of the site has been assessed and is presented in the ES in sections 20, 19, 22 and 14. It is concluded that the proposed development will not have a significant impact on tranquillity during the operational phases and that in the long term will contribute positively to the tranquillity of the area as set out in Section 25 of the Environmental Statement.</p>
	<p>There are two public footpaths leading from Duddington Village that are very close to your proposed site. These are, currently, the only rights of way leading out of the village and are frequently used by residents for walks. Also Fineshade Wood is open-access land, allowing visitors and residents alike to wander freely though the network of rides and glades. Forestry England have estimated that 400,000 people per year visit Fineshade Wood for recreation and exercise and these numbers have increased dramatically during 2020 with the pressures imposed by the pandemic. Increasingly, people from</p>	<p>The outskirts of Duddington are approximately 1.1km to the west north west of the boundary of the northern section of the western extension area and Fineshade is located approximately 2.4km to the west south west of the southern part of the proposed western extension area. The A43, Collyweston Quarry and agricultural fields are located between Duddington and the northern area of the proposed western extension. The noise and visual impact assessments (PINS document reference 5.4.20.1 and 5.4.14.1) demonstrate that there will be no significant</p>

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	<p>Corby, Kettering and Peterborough have been using the entire Fineshade woodland for its tranquillity and to escape the pressures of lockdown and urban life. Already noise from, and the visual impact of, your present site makes the footpaths and the nearest part of the woodland a less attractive option for quiet walks. To emerge from peaceful woodland to see mountainous spoil heaps with lorries labouring up them is a soul-destroying experience. Your proposal will mean the present degradation of tranquillity and beauty being extended for an extra 20 years and also being brought much nearer to the wood. Because the worked area will be immediately adjacent to the public woods there will be a general loss of amenity. For example, one area of the wood adjacent to your proposal is a glade where wild garlic grows in profusion, where generations of residents have gone to forage or picnic. With new spoil heaps towering above that glade the opportunity for restoring mental well-being will be gone. In your extensive documents we can find no mention of, or appreciation for, the reduction of amenity caused by developing adjacent to publicly accessible woodland.</p>	<p>impacts on residents in Duddington as a result of the proposed development. Fineshade Woods and The Assarts are located between the proposed development boundary and Fineshade and the noise and visual impact assessments demonstrate that there will be no significant impacts on residents in Fineshade as a result of the proposed development.</p> <p>No public rights of way cross the development site and the closest footpath (MX15) is approximately 100m to the west of the western boundary of the development at the closest point. For the majority of the route of MX15 the proposed development site is screened from view by the intervening woodland. Glimpses of the site are possible from a short length of the footpath at a break in the woodland at the location of the water pipeline route. However, due to the woodland blocks either side of the view, which extend right to the edge of the proposed western extension area, views of the rest of the proposed western extension area are not available so the vast majority of the proposed works would be out of view. Once footpath users are back within the woodland itself, there would be no or very obscured views of the proposed works due to the mass of intervening woody and (in summer) leafy vegetation. Any temporary impacts on amenity users of this part of Fineshade Wood, including on the tranquillity of the setting would therefore be limited to a short part (approximately 50m) of a long footpath walk (approximately 1.5km for MX15 in Fineshade Wood). Footpath MX15 leads to MX18 and other footpaths beyond. Footpath MX18 is not located in woodland and is close to the active mineral extractions at Collyweston Quarry therefore the current and proposed operations at ENRMF are not entirely out of keeping with the other activities in the vicinity. In addition, operations in the area closest to footpath MX15 will only take place while the nearby</p>

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		<p>phases are being prepared, filled and capped; the area will not be operational for the whole lifetime of the proposed development.</p> <p>The overall restoration proposals will bring improved opportunities for the amenity use of the site. Accordingly, any views of the site from this limited length of the footpath route will be transient and unlikely to affect the overall level of tranquillity experienced along the route of the linked footpaths. Additional monitoring has been carried out to assess the acoustic environment at locations along the footpaths closest to the proposed development in order to assess the potential impact on users of this section of the footpath. Any additional impacts from noise will be limited in the context of the overall footpath route.</p> <p>The only lighting which will be present on the landfill areas will be mobile lighting used only when necessary during the operational hours for mineral extraction and landfill working. Accordingly the lighting associated with the proposed western extension area is likely to have a negligible effect on the tranquillity of people using the woodland and other adjacent areas. An assessment of the impacts of the proposed development on amenity is presented in Section 22 of the Environmental Statement.</p>
	<p>The Parish Council has particular concerns about the more northern of the two fields because this would reinforce the fragmentation of adjacent areas of woodland. This Parish Council is currently working on a Neighbourhood Plan and in that the issue of woodland connectivity is addressed.</p>	<p>All wildlife, plants, animals and insects have certain definite habitat requirements; these are mainly to find shelter, cover from predators and to obtain food. They rarely move far from the habitat that meets their requirements and that they are established in or feel safe within. To function as a wildlife corridor, an area must provide all these attributes consistently. Due to the cyclical nature of arable farming, there is little opportunity for such a corridor to become established and as no species cross it as part of continuous or habitual use, loss of the fields will not sever any wildlife corridor or disconnect any population.</p>
	<p>Within the Parish there are a number of arable fields that we would like to see covered with trees (either by planting or by natural regeneration) that would assist with this linkage, but the most important field is undoubtedly beyond our</p>	

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	<p>boundary-the northern part of your proposed extension. Were your proposed work to go ahead, woodland wildlife communities and protected species which are currently able to cross the arable areas (albeit reluctantly) would be totally blocked for decades, until your restoration work reconnects the woodlands. However, since you have an option to purchase the field it does put you in the position of being able to replace the low-quality arable field, right now, by the creation of high-quality woodland-based habitat. Therefore the Parish Council would again urge you to rethink the exact areas for your expansion, concentrating on the fields further south. At the same time you could strengthen your green credentials by substantial woodland creation, which would have a beneficial effect on the landscape and wildlife of this part of Rockingham Forest. This new woodland would also provide more of a buffer between your activities and the Duddington community.</p>	<p>Very great care has been taken to identify every species currently using the woods, hedges and their margins. No woodland will be lost or damaged, and new habitat creation or enhancement will provide increased and improved habitat for all the species currently using the area resulting in biodiversity net gain for the area. Consultation with the ecologists currently involved in monitoring the rare and vulnerable species in the area has ensured that their current locations and requirements are known and understood so they will not be put at risk.</p> <p>The site operations and subsequent restoration have been planned to ensure that no species, flora or fauna, will be lost. The requirements of all species have been carefully considered in planning the sequence and method of working the site so that habitats can be enhanced or created at the earliest opportunity during and even before operations commence. Pre-operational improvements include the retention and improvement of the hedgerow to the north of the proposed site and the establishment of wide field margins so that the important existing adjacent habitats will be maintained, improved and managed throughout the operational life of the site.</p> <p>The proposed western extension to the site will be constructed and operated in a series of phases which will be progressively restored so that the site is returned to beneficial ecological use as soon as possible. The current projection is that the first, northernmost, area (Phase 12) will be restored in around 5 to 7 years from the start of cell extraction work in the area.</p> <p>There have been active discussions with both Natural England and the Forestry Commission regarding planting as both organisations have an interest in the choice of trees and linking habitats. Natural regeneration will also play a part. There are other opportunities for habitat</p>

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		creation which are being actively explored to realise the ambitions to create connectivity between the two areas of woodland as soon as possible resulting in significant biodiversity gain as a result of the proposals. If the site was not utilised as an extension to the existing ENRMF it would remain in arable use with limited ecological interest.
Kings Cliffe Parish Council	The Parish Council strongly object to these plans. However, should you proceed with these we would strongly insist an alternative entrance is put into place to manage the additional vehicle movement, maintenance and cleanliness of the road given the recent near misses and road repairs recently carried out.	<p>The current entrance to the site is approved under the existing Development Consent Order (DCO) and was assessed as part of that application as being suitable for the development. Nevertheless, Augean has sought and gained approval for widening of the site entrance and the design has been approved by the highways team at the former Northamptonshire County Council. This work will widen the site entrance and improve the visibility splays in both directions as well as improving the drainage in the site entrance area. These improvements are being carried out in July and August 2021 and therefore will already be in place if the DCO is granted. It is also proposed that the weighbridge and reception location for HGVs entering the site will be moved further within the site to allow a longer queuing area on the site and the easier circulation of vehicles within ENRMF if the DCO is granted.</p> <p>The former Northamptonshire County Council highways team (now part of North Northamptonshire Council) who are responsible for road signage have indicated that the current signage on the Stamford Road could be improved, particularly on the approach to the woods in either direction which has seen a number of accidents due to excess speed and the adverse camber on the highway. Any such signs must be installed by or under the control of the highways team themselves. Whilst these accidents have not been caused by the activities of Augean, Augean has indicated that they are happy to contribute towards the costs of the signage improvements.</p>

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		<p>The site has full wheel cleaning facilities that are used by all vehicles prior to leaving the site, the site also has a road sweeper employed full time to sweep the highway between the site entrance and the A47 in order to keep it clean and free of mud and debris. The condition of the highway is continuously monitored by the road sweeper driver and also by ENRMF site staff via routine inspections and monitoring of site CCTV cameras to confirm that the road is maintained in a satisfactory manner at all times.</p> <p>The current DCO for the site includes a requirement which restricts HGV vehicles associated with the site from travelling to the south of the site access on Stamford Road towards the village of Kings Cliffe, unless they are delivering wastes collected locally. This requirement will be mirrored in the draft DCO (PINS document reference 3.1) for the proposed development.</p> <p>In addition the Section 106 Agreement for the existing ENRMF includes an annual payment be made by Augean to the Northamptonshire County Council highways team for repairs to Stamford Road between the site entrance and the A47. Improvements have recently been implemented by the Council and the highway surface at the entrance to the site has been repaired. Similar requirements for contributions towards highway repairs will be included in a Section 106 Agreement for the proposed development.</p>
Northamptonshire County Council (this response was subsequently adopted by North	Northamptonshire County Council is the minerals and waste planning authority in which both the existing East Northants Resource Management Facility and the proposed new location to its west are sited. As the minerals and waste planning authority the council also has an up to date minerals and waste local plan, the Northamptonshire Minerals and Waste Local Plan	This application is accompanied by a Planning Statement (PINS document reference 6.1) which addresses the national and local policies relevant to the proposed development including those set out in the MWLP. Policies with respect to mineral extraction and waste disposal are reviewed as well as those relating to environmental impacts. The proposed development is generally in accordance with the policies set out in the MWLP.

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Northamptonshire Council and West Northamptonshire Council)	<p>(MWLP), adopted July 2017, and upon which significant weight needs to be given in determining the application.</p> <p>As the adopted local plan for minerals and waste matters covering the proposed application site, the minerals and waste planning authority would therefore request that the application for the Development Consent Order references how the proposal both does and does not conform to the policies and general approach to waste disposal and to mineral extraction in the MWLP and if elements of the proposal do not conform to the MWLP how this should be addressed.</p> <p>In particular the minerals and waste planning authority seeks the local plan policy justification for the following matters to be clearly set out:</p> <ul style="list-style-type: none"> - The winning and working of minerals in order to create the landfill void for disposal, particularly in respect of Policy 3 (Development criteria for mineral extraction) which paragraphs 4.60 and 4.61 on refractory minerals and clay specifically refers to. In relation to this references should also be made as to why other locations, including nearby in Peterborough in Augean's portfolio are not considered more appropriate rather than extracting a site for the sole purpose of it then being filled.- How the amount of hazardous waste disposal meets the requirements of Policy 14 (Strategy for waste disposal) and Policy 15 (Development criteria for waste disposal) of the MWLP. 	<p>Notwithstanding this, the proposed development is classed as a Nationally Significant Infrastructure Project due to its scale and the nature of the waste to be disposed. In these circumstances the National Policy Statement for Hazardous Waste has greater weight than the relevant local planning policy.</p> <p>Consideration of the alternatives to the development the subject of the application is set out in Section 10 of this ES. The assessment of alternatives includes both the selection and the assessment of the suitability of the site location, the identification of the constraints which affect and lead to the choices that have been made with respect to the design of the proposed operations, the containment engineering design, the restoration profile hence the void generated, the operational and management proposals and the design of the restoration scheme.</p>

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	<ul style="list-style-type: none"> - How the amount of radioactive waste disposal meets the requirements of Policy 17 (Development criteria for radioactive waste management), Policy 14 (Strategy for waste disposal) and Policy 15 (Development criteria for waste disposal) of the MWLP. - How the 50,000tpa increase in throughput of the waste treatment facility to 250,000tpa meets the considerations of Policy 10 (Northamptonshire's waste management capacity) and Policy 12 (Development criteria for waste management facilities) of the MWLP. - How the combined waste importation rate limit to the waste treatment facility and landfill of 300,000tpa (an increase of 50,000tpa compared with the currently consented total input rate) meets the considerations of Policies 10 and 14 of the MWLP. - Why when this proposal is effectively a new location to the west of the existing site that restoration to a generally domed restoration profile is considered appropriate. - Why an amendment to the longstanding approved restoration profile of the existing ENRMF site is considered appropriate. - Whether continuing operations by a further 20 years beyond the completion of the existing operational site (and which itself is still five years away) is appropriate and whether, as is the case with the existing permitted facility, there should be a fixed completion date. 	

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	<p>- The current operations in relation to radioactive waste provide for funding to be made to the local communities in relating to amounts landfilled. Policy 25 (Implementation) in the MWLP supports this by including reference to proposals providing benefits to compensate the local community affected by the development. There should be consideration given as to whether this community benefit should be enhanced.</p>	<p>It is intended that the Augean Community Fund will continue to operate throughout the life of the proposed development and an obligation will be included in the draft Section 106 Agreement (PINS document reference 6.4). Consideration has been given to whether it should be enhanced. As you know, the agreed contribution made by Augean to the Community Fund as a direct result of the acceptance of LLW at the site is £5 per tonne of LLW deposited at the site. This contribution was made in spite of the conclusion that the disposal of LLW at the site does not result in additional environmental impact compared with other waste but recognises that there is some perception of impact within the local community. From 2015 up to the end of 2019 35,284.73 tonnes of LLW had been deposited at the site (Table 9.6 of the PEIR) which equates to approximately £176,424 contributed to the Community Fund ie an average of approximately £35,300 per annum. In addition, Augean participates in the Landfill Communities Fund (LCF) scheme which encourages landfill site operators to fund local community environmental projects using credits as allowed in the Government Landfill Tax scheme. LCF contributions are paid by Augean to the community via Grantscape, who allocate the sums to approved uses. These have increased by 43% per tonne since 2013 (when the LLW Community Fund rate was first agreed) while the Consumer Price Index (CPI) has only increased by 12% over that time. However, the recent overall average contribution by Augean to Grantscape is equivalent to £5.69 per tonne. Accordingly, for each tonne of LLW deposited at the site the community receives a total of £10.69 per tonne of LLW which is a 19% overall increase in the rate per tonne since 2013. This rate of increase is higher than the 12% increase in CPI since 2013. In summary, the increase in the relative contribution to the community resulting from the deposition of LLW at the site has</p>

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		<p>matched and even exceeded the increase in CPI over the same period. Accordingly we do not consider that any increase in the rate of compensation to the Community Fund is necessary.</p>
	<p>Northamptonshire County Council as the Local Highway Authority note that the applicant intends to review traffic numbers associated with the currently consented activities at the site to determine whether there will be any significant changes to these flows as a result of the increase in size of the facility.</p> <p>The applicant states that the probable average number of HGV vehicle movements associated with the combined activities that were assessed in relation to the previous consent was 196 per day (98 movements in and 98 movements out). Whilst the applicant states this figure is unlikely to change significantly as a result of this application we will need appropriate surveys and assessment to confirm this is the case.</p> <p>To confirm due to the current COVID-19 pandemic obtaining traffic survey data for volumetric purposes is not permitted within Northamptonshire however we review matters frequently and seek to lift this measure once traffic levels are returned to near typical levels.</p> <p>As noted by the applicant a full Transport Statement will be required to accompany the DCO application and prior we welcome a Scoping Note to agree the contents of this</p>	<p>Augean and their traffic specialist advisers have held discussions with the Highway Authority in order to agree the scope of the traffic assessments. These discussions included the alternative means by which representative, up to date road traffic data could be derived for use in the assessments given the restrictions associated with the COVID-19 pandemic.</p> <p>The current entrance to the site is approved under the existing DCO and was assessed as part of that application as being suitable for the development. Nevertheless, Augean has gained approval for widening of the site entrance and the proposed design has been approved by the highways team at the former Northamptonshire County Council. These improvements to the access are being implemented in July and August 2021 and therefore will already be in place if the new DCO is granted. A transport and traffic impact assessment is provided in Section 19 of this ES the scope of which was agreed with the relevant consultees including the local Highways Authority.</p> <p>The Section 106 Agreement (PINS document reference 6.2.4.3) for the site includes an annual payment for repairs to Stamford Road between the site entrance and the A47. It is proposed that similar arrangements will be included in a Section 106 Agreement for the proposed development (PINS document reference 6.4).</p> <p>The current DCO for the existing ENRMF includes a requirement which restricts HGV vehicles associated with the site from travelling to the south of the site access on Stamford Road towards the village of Kings Cliffe, unless they are delivering wastes collected locally. It is</p>

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	<p>The current site access arrangements appear sub-standard. We will require confirmation of access width and radii with visibility splays shown on a scaled drawing. Vehicle tracking of the largest vehicles to enter site will also be required</p> <p>Improvements may be required for the junction of Stamford Road with the A47 subject to trip distribution information being provided.</p> <p>A suitably worded condition covering collection vehicles using the site access to not travel to the South of the site access on Stamford Road towards the village of Kings Cliffe, unless they are delivering wastes collected locally will be required.</p>	<p>proposed that a similar requirement will be included in the draft DCO (PINS document reference 3.1) for the proposed development</p>
<p>East Northamptonshire District Council</p>	<p>The justification provided in the consultation documentation for the significantly increased land levels proposed by the 'domed' restored landform is noted, however further justification and explanation for the 'domed' restoration profile is required.</p> <p>An analysis should be undertaken to determine what trees and vegetation would be growing on the site in around 200 years time, taking account of climate change, to ensure the capping layer would be sufficient to withstand root penetration from these species.</p>	<p>A domed restoration profile is necessary for landfill sites which accept non-inert waste in order to maximise the runoff of rainfall. The final profile of the waste and capping layer is designed to form a stable slope which will encourage shedding of rainfall to minimise infiltration and as a consequence to minimise the generation of leachate. Leachate is the contaminated liquid formed when water infiltrates into the waste and which is collected in the base of the site from where it is collected and managed. Further detail on the design of the landfill site including justification for the restoration profile is provided in Section 5 of this ES.</p> <p>The restoration scheme for the site includes the planting of trees on the restored site. The final details including the types of trees which will be planted have been discussed and agreed with Natural England. Detailed discussions have taken place with Natural England as well as North Northamptonshire Council, Forestry England and the Wildlife Trust in order to agree the restoration planting scheme which included discussions on tree species. Actions are also</p>

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		<p>in hand, including through liaison with the Friends of Fineshade Wood and others, for proposals to collect and propagate tree saplings from local seed banks. Research by the Forestry Commission has shown that the risks of root intrusion into a compacted low permeability cap are not significant and the planting of woodland on restored landfill sites is accepted by the Environment Agency who do not consider that the risks of root penetration are significant. Woodland planting on the restored landfill site is included in the approved restoration scheme for the current landfill area. The specification and construction of the low permeability capping layers are approved and regulated through the Environmental Permit by the Environment Agency.</p>
	<p>Further justification is required to confirm that the soil thickness of 1m – 1.5m beneath the ‘domed’ restoration profile would be sufficient for the restoration scheme and to protect the capping layer from root penetration (related to item 2 above).</p>	<p>As set out in above research has shown that the risks of root intrusion into a compacted low permeability cap are not significant. The research has concluded that soil of 1.5m thickness is suitable to ensure trees can be established on landfills without posing a significant threat of damage to the underlying cap which would adversely affect the management of water ingress to the waste.</p>
	<p>The commitment to provide three photomontages from Viewpoints 3, 5 and 9 to illustrate the appearance of the proposed restored landform in the landscape is welcomed; however additional photomontages are requested from other viewpoints to assist in the assessment of its visual and landscape impacts.</p>	<p>Liaison has taken place with the Minerals and Waste Planning Service at North Northamptonshire Council regarding the proposed development including with respect to the landscape and visual impact assessment. As there are limited locations from which views of the proposed development would be available it is not considered necessary to prepare photomontages from all the viewpoint locations considered in the Landscape and Visual Impact Assessment. In agreement with the Minerals and Waste Planning Service at North Northamptonshire Council, it has been determined that the proposed locations will provide a representative selection of views to assist in the assessment of impacts. The photomontages</p>

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	The advice of the Lead Local Flood Authority should be sought regarding surface water run-off and drainage from the proposed development.	are presented in the Landscape and Visual Impact Assessment at Appendix ES14.1 to this ES (PINS document reference 5.4.14.1). The proposed Surface Water Management Plan (PINS document reference 6.5) has been provided to the Lead Local Flood Authority and their feedback is awaited.
Natural England	A detailed submission was made by Natural England which included comments on the potential for impacts on designated sites, the potential for impacts on protected species, the potential for impacts on air quality that may affect the adjacent protected woodlands, the importance of using the opportunity of the restoration of the site to enhance the local distinctiveness in the long term of the Rockingham Forest landscape character, to encourage Augean to take advantage of the opportunities to provide stronger ecological links between Collyweston Great Wood and Fineshade Wood as the application site is of major strategic importance in this respect, and forms one of the key potential habitat corridors that can help create a nature recovery network linkage across the north Rockingham Forest landscape, and to demonstrate measurable biodiversity net gain.	A Discretionary Advice Service (DAS) meeting was held with Natural England at the ENRMF offices on 10 February 2021. Plans for the proposed extension area (phased clay extraction / landfill / restoration) with potential utilities limitations in some areas and likely timeframes were outlined. Full descriptions (completed and ongoing) of the surveys undertaken for protected and other valued species, and the habitat surveys to identify S41 habitats, and to inform the BNG baseline were given. At this meeting, early thoughts on avoidance of impacts, including the issue of loss of connectivity were discussed, and suggestions were put forward by NE. Due to Covid restrictions, most later discussions were held by video or telephone or email, including with representatives of other bodies. Results and avoidance/mitigation plans were continually updated and discussed, with all suggestions received included in further versions. A later site meeting was held on the ENRMF site for NE to see completed restoration/management work carried out on the current site. More details are given in the Ecological Impact Assessment presented at Appendix 13.1 to the Environmental Statement.
Environment Agency	Requirements under the Environmental Permitting Regulations (2016) Augean currently operate the East Northants Resource Management Facility under an Environmental Permit. The proposed development is an extension to the current site activities and would require the permit to be varied to accommodate the increased capacity etc. It is understood that the extended	Discussions have been taking place with the Environment Agency since 2019 regarding the proposed development, the principles of the landfill design and the scope of the site investigation. A detailed hydrogeological risk assessment has been carried out as part of the application for the variation of the Environmental Permit for the landfill in the proposed western extension area in order to demonstrate that appropriate groundwater protection is in place.

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	<p>development will essentially operate in the same manner as the current site activities.</p> <p>We met with the applicants' consultant on 17 July 2020 to discuss the permit variation. It was concluded that the proposals are generally acceptable as the design and operation of the site will be similar to the current permitted site. However, the detailed design has yet to be agreed with particular regard to the protection of the nearby swallow hole. This will be determined by the outcome of additional proposed investigations and assessments on this matter.</p> <p>We have requested that these assessments are based upon our position statements N6, N7, N9 and N11 in Section N of our document detailing our approach to groundwater protection which is located here: www.gov.uk/government/publications/groundwater-protection-position-statements</p>	<p>An application for the variation to the Environmental Permit for the landfill in the proposed western extension area was submitted to the Environment Agency in May 2021.</p> <p>An application for the variation to the Environmental Permit for the waste treatment and recovery facility was submitted to the Environment Agency in May 2021.</p>
Public Health England	A detailed submission was made by Public Health England which included comments on potential impacts on air quality, health and wellbeing, mental health and physical activity/access to open space.	The comments provided by Public England reflect the advice now set out in their guidance on NSIP applications. Discussions were held with Public Health England in February 2021. In response to the comments and advice a separate chapter is provided at Section 25 of the ES which presents in a single location the assessments of factors which have the potential to affect health including the wider determinants of health.
The Forestry Commission (East and Midlands)	A detailed submission was made by Forestry England which focussed on the connection between the two woodlands either side of the western section of the proposed western extension and in particular the opportunity to restore a	Emails were exchanged with Forestry Commission Services following receipt of their original submission to give assurances that the issues of connectivity, and recognition of the importance for future resilience and long term aims for Rockingham Forest of connecting the

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	link between these woods as part of a wider aim to deliver a more biodiverse landscape across the Rockingham Forest Area.	adjacent woodlands. Further discussions were held with the staff of Forestry England, by video and telephone, to provide ongoing information of surveys and avoidance/mitigation/enhancement planning. Technical advice on choice of tree species and deer fencing was also given by FE staff. More information is provided in the Ecological Impact Assessment presented at Appendix 13.1 to the Environmental Statement.
Historic England (Midlands)	Recommended that engagement with the specialist archaeologist adviser at Northamptonshire County Council is continued in order that the assessment of potential impacts on heritage assets is appropriately detailed and robust.	Communication with the specialist adviser and others continued throughout the assessment work and is detailed in the assessment for archaeology and cultural assessment provided at Appendix ES16.1. The communications have resulted in an agreed archaeological mitigation strategy which is included in the (PINS document reference 6.5).
Ministry of Defence	<p>Birdstrike</p> <p>This application occupies the statutory birdstrike safeguarding zone surrounding the aerodrome. Within this zone, the principal concern of the MOD is that the creation of new habitats may attract and support populations of large and, or, flocking birds close to the aerodrome.</p> <p>The site currently accepts hazardous waste. The landfill does not handle domestic or catering waste. It is proposed that the extension will be for the same types of waste as currently permitted. The waste to be managed at the site will contain minimal quantities of putrescible material and the waste and the organic content of the waste which can be landfilled is limited by legislation to less than 6% by volume of total organic carbon.</p>	<p>It was confirmed with the Ministry of Defence (MoD) that the site will not handle any putrescible wastes and as that should not change as part of the proposed extension, therefore the wastes being handled should not attract hazardous birds. However, it is considered by the MoD that stripping of topsoil and storing on site can result in an attractant both from the stripped areas and stored soils and from puddling and ponding on the bare surface. A Bird Hazard Management Plan was requested that should include monitoring during and after the process until the bare earth is covered or removed. A Bird Hazard Management Plan is included in the (PINS document reference 6.5).</p> <p>The amount of open water included in the Restoration Concept Scheme has been minimised as requested by the MoD and the ponds will be surrounded by tall marginal and emergent vegetation or scrub in order to further reduce the attraction posed to hazardous birds by open water.</p>

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	<p>If only permitted wastes, and no putrescible or biodegradable waste are handled on the site then this should not result in an exploitable food resource for hazardous birds such as gulls and Red Kites.</p> <p>The stripping and handling of topsoils can expose invertebrates, resulting in feeding opportunities for hazardous birds such as corvids and gulls. As such, at any development near an aerodrome which involves earthworks a Bird Hazard Management Plan (BHMP) would be required to ensure that the handling of topsoil does not result in a transitory attractant for hazardous birds.</p> <p>The restoration of the existing site and proposed extension is to generally domed restoration landforms with restoration to nature conservation interest using the soils available at the site as well as suitable imported materials. If the restoration is to species rich grassland, then this should not result in an attraction for hazardous birds. Other habitat types may be attractive to hazardous species, and the restoration should be agreed with the MOD.</p> <p>To address the issue of increased birdstrike risk, DIO Safeguarding would request a condition to be included as part of any permission granted for this application as follows:</p> <ul style="list-style-type: none"> • No putrescible wastes are accepted or handled on site in line with the currently permitted wastes due to the potential for such waste to provide an exploitable food resource for hazardous birds such as gulls and Red Kites. 	

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	<ul style="list-style-type: none"> • A Bird Hazard Management Plan is submitted to compact, cover or remove any areas of loose topsoil as soon as practicable and to monitor and disperse any hazardous birds attracted to these areas. • The proposed restoration habitats are agreed with the MOD prior to commencement of restoration 	
Cecil Estate Family Trust	<p>A. Profile of the landform – concern regarding the proposed changes to the restoration profile of the existing landfill site and the eventual restoration profile of the western extension particularly that the gradient of the restored land to the existing site to be steepened even further with associated increased risk of flooding.</p> <p>B. Traffic Impact Assessment – concern that there will be significant increases in traffic numbers and that a traffic impact assessment should be carried out.</p> <p>C. Impact on the Adjacent SSSI & Ancient Woodland & National Nature Reserve - an assessment of road traffic noise and the noise from the increased activity on the existing and proposed site is needed to assess the impacts on neighbouring land, wildlife and occupiers.</p> <p>D. Assessment of Odour – the impacts from odour need to be properly assessed and sufficient mitigation measures put forward as part of the application.</p> <p>E. Ownership of Bund – comments on land ownership issues that are not material to the DCO application</p>	<p>A. The respondent’s main concern relates to the gradient of the northern slope of the existing ENRMF. No changes are proposed as part of the proposed development to the gradient of the northern slopes as the eastern part of these areas are already completed and restored.</p> <p>B. A traffic impact assessment has been carried out and is provided at Section 19 and Appendix ES19.1 of the ES. The increase in traffic associated with the proposed development is limited.</p> <p>C. As the increase in traffic associated with the proposed development is limited (an average of four additional movements per hour), any associated impact on the SSSI from traffic is negligible. The impact of noise associated with the increase in traffic is considered in Section 20 of the ES.</p> <p>D. The potential for odour associated with the proposed development is considered in Section 19 of the ES. The control, management and monitoring of waste, including potentially odorous waste, is part of the procedures regulated by the Environment Agency through the Environmental Permit.</p>

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National Grid	<p>National Grid Gas has a high pressure gas transmission pipeline and associated apparatus located within or in close proximity to the proposed order limits. The transmission pipeline forms an essential part of the gas transmission network in England, Wales and Scotland:</p> <ul style="list-style-type: none"> • Feeder Main 2 Helpston to Duddington. <p>Gas Infrastructure</p> <p>The following points should be taken into consideration:</p> <ul style="list-style-type: none"> ▪ National Grid has a Deed of Grant of Easement for each pipeline, which prevents the erection of permanent / temporary buildings, or structures, change to existing ground levels, storage of materials etc <p>Pipeline Crossings:</p> <ul style="list-style-type: none"> • Where existing roads cannot be used, construction traffic should ONLY cross the pipeline at previously agreed locations. • The pipeline shall be protected, at the crossing points, by temporary rafts constructed at ground level. The third party shall review ground conditions, vehicle types and crossing frequencies to determine the type and construction of the raft required. • The type of raft shall be agreed with National Grid prior to installation. 	<p>Discussions have been held with National Grid and the other service providers who have apparatus in the vicinity of the proposed development in order to agree the appropriate safe standoffs for the excavation works from the location of the services. The correspondence with National Grid and other service providers is presented at Appendix ES5.2 and the agreed standoffs are incorporated into the overall boundary standoffs as set out at Appendix ES5.1 and in the Boundary Design Principles for the Western Extension which is in the DCO Environmental Commitments document (PINS document reference 6.5).</p>

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	<ul style="list-style-type: none"> • No protective measures including the installation of concrete slab protection shall be installed over or near to the National Grid pipeline without the prior permission of National Grid. • National Grid will need to agree the material, the dimensions and method of installation of the proposed protective measure. • The method of installation shall be confirmed through the submission of a formal written method statement from the contractor to National Grid. • Please be aware that written permission is required before any works commence within the National Grid easement strip. • A National Grid representative shall monitor any works within close proximity to the pipeline to comply with National Grid specification T/SP/SSW22. • A Deed of Consent is required for any crossing of the easement <p>General Notes on Pipeline Safety:</p> <ul style="list-style-type: none"> • National Grid will also need to ensure that our pipelines access is maintained during and after construction. <p>Our pipelines are normally buried to a depth cover of 1.1 metres however; actual depth and position must be confirmed on site by trial hole investigation under the supervision of a National Grid representative. Ground cover above our pipelines should not be reduced or increased.</p> <ul style="list-style-type: none"> • If any excavations are planned within 3 metres of National Grid High Pressure Pipeline or, within 10 metres of an AGI (Above Ground Installation), 	

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	<p>or if any embankment or dredging works are proposed then the actual position and depth of the pipeline must be established on site in the presence of a National Grid representative. A safe working method agreed prior to any work taking place in order to minimise the risk of damage and ensure the final depth of cover does not affect the integrity of the pipeline.</p> <ul style="list-style-type: none"> • Excavation works may take place unsupervised no closer than 3 metres from the pipeline once the actual depth and position has been confirmed on site under the supervision of a National Grid representative. Similarly, excavation with hand held power tools is not permitted within 1.5 metres from our apparatus and the work is undertaken with NG supervision and guidance. <p>Any request for additional depth of soil cover over the pipeline can be investigated further on request but it is avoided due to the additional loading and restriction for access to the pipe in the case of an emergency.</p> <p>We also wish to confirm that any proposed overhead power cable realignment at this site should be kept away from the pipeline, due to the impact on the pipeline's Cathodic Protection Scheme</p>	