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APPENDIX ES2.2

SCOPING OPINION FROM THE SECRETARY OF STATE DATED AUGUST 2020



SCOPING OPINION:

Proposed East Northants Resource Management Facility Western Extension

Case Reference: WS010005

Adopted by the Planning Inspectorate (on behalf of the Secretary of State) pursuant to Regulation 10 of The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017

August 2020

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1. INTRODUCTION

1.1 Background

- 1.1.1 On 01 July 2020, the Planning Inspectorate (the Inspectorate) on behalf of the Secretary of State (SoS) received a scoping request from Augean South Limited (the Applicant) under Regulation 10 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) for the proposed East Northants Resource Management Facility Western Extension (the Proposed Development).
- 1.1.2 In accordance with Regulation 10 of the EIA Regulations, an Applicant may ask the SoS to state in writing its opinion *'as to the scope, and level of detail, of the information to be provided in the environmental statement'*.
- 1.1.3 This document is the Scoping Opinion (the Opinion) provided by the Inspectorate on behalf of the SoS in respect of the Proposed Development. It is made on the basis of the information provided in the Applicant's report entitled "EIA Scoping Report - Proposals for the Approach to and Scope of an Environmental Impact Assessment and Environmental Statement to Accompany the Proposed Development Consent Order Application for the Alteration and Construction of Hazardous Waste and Low Level Radioactive Waste Facilities at the East Northants Resource Management Facility, Stamford Road, Northamptonshire" (the Scoping Report). This Opinion can only reflect the proposals as currently described by the Applicant. The Scoping Opinion should be read in conjunction with the Applicant's Scoping Report.
- 1.1.4 The Applicant has notified the SoS under Regulation 8(1)(b) of the EIA Regulations that they propose to provide an Environmental Statement (ES) in respect of the Proposed Development. Therefore, in accordance with Regulation 6(2)(a) of the EIA Regulations, the Proposed Development is EIA development.
- 1.1.5 Regulation 10(9) of the EIA Regulations requires that before adopting a scoping opinion the Inspectorate must take into account:
- (a) *any information provided about the proposed development;*
 - (b) *the specific characteristics of the development;*
 - (c) *the likely significant effects of the development on the environment; and*
 - (d) *in the case of a subsequent application, the environmental statement submitted with the original application.*
- 1.1.6 This Opinion has taken into account the requirements of the EIA Regulations, as well as current best practice towards preparation of an ES.
- 1.1.7 The Inspectorate has consulted on the Applicant's Scoping Report and the responses received from the consultation bodies have been taken into account in adopting this Opinion (see Appendix 2).

Scoping Opinion for Proposed East Northants
Resource Management Facility Western Extension

- 1.1.8 The points addressed by the Applicant in the Scoping Report have been carefully considered and use has been made of professional judgement and experience in order to adopt this Opinion. It should be noted that when it comes to consider the ES, the Inspectorate will take account of relevant legislation and guidelines. The Inspectorate will not be precluded from requiring additional information if it is considered necessary in connection with the ES submitted with the application for a Development Consent Order (DCO).
- 1.1.9 This Opinion should not be construed as implying that the Inspectorate agrees with the information or comments provided by the Applicant in their request for an opinion from the Inspectorate. In particular, comments from the Inspectorate in this Opinion are without prejudice to any later decisions taken (eg on submission of the application) that any development identified by the Applicant is necessarily to be treated as part of a Nationally Significant Infrastructure Project (NSIP) or Associated Development or development that does not require development consent.
- 1.1.10 Regulation 10(3) of the EIA Regulations states that a request for a scoping opinion must include:
- (a) a plan sufficient to identify the land;*
 - (b) a description of the proposed development, including its location and technical capacity;*
 - (c) an explanation of the likely significant effects of the development on the environment; and*
 - (d) such other information or representations as the person making the request may wish to provide or make.*
- 1.1.11 The Inspectorate considers that this has been provided in the Applicant's Scoping Report. The Inspectorate is satisfied that the Scoping Report encompasses the relevant aspects identified in the EIA Regulations.
- 1.1.12 In accordance with Regulation 14(3)(a), where a scoping opinion has been issued in accordance with Regulation 10 an ES accompanying an application for an order granting development consent should be based on '*the most recent scoping opinion adopted (so far as the proposed development remains materially the same as the proposed development which was subject to that opinion)*'.
- 1.1.13 The Inspectorate notes the potential need to carry out an assessment under The Conservation of Habitats and Species Regulations 2017 (the Habitats Regulations). This assessment must be co-ordinated with the EIA in accordance with Regulation 26 of the EIA Regulations. The Applicant's ES should therefore be co-ordinated with any assessment made under the Habitats Regulations.

1.2 The Planning Inspectorate's Consultation

- 1.2.1 In accordance with Regulation 10(6) of the EIA Regulations the Inspectorate has consulted the consultation bodies before adopting a scoping opinion. A list of the consultation bodies formally consulted by the Inspectorate is provided at Appendix 1. The consultation bodies have been notified under Regulation 11(1)(a) of the duty imposed on them by Regulation 11(3) of the EIA Regulations to make information available to the Applicant relevant to the preparation of the ES. The Applicant should note that whilst the list can inform their consultation, it should not be relied upon for that purpose.
- 1.2.2 The list of respondents who replied within the statutory timeframe and whose comments have been taken into account in the preparation of this Opinion is provided, along with copies of their comments, at Appendix 2, to which the Applicant should refer in preparing their ES.
- 1.2.3 The ES submitted by the Applicant should demonstrate consideration of the points raised by the consultation bodies. It is recommended that a table is provided in the ES summarising the scoping responses from the consultation bodies and how they are, or are not, addressed in the ES.
- 1.2.4 Any consultation responses received after the statutory deadline for receipt of comments will not be taken into account within this Opinion. Late responses will be forwarded to the Applicant and will be made available on the Inspectorate's website. The Applicant should also give due consideration to those comments in preparing their ES.

1.3 The European Union (Withdrawal Agreement) Act 2020

- 1.3.1 The UK left the European Union as a member state on 31 January 2020. The European Union (Withdrawal Agreement) Act 2020 gives effect to transition arrangements that last until the 31 December 2020. This provides for EU law to be retained as UK law and also brings into effect obligations which may come in to force during the transition period.
- 1.3.2 This Scoping Opinion has been prepared on the basis of retained law and references within it to European terms have also been retained for consistency with other relevant documents including relevant legislation, guidance and advice notes.

2. THE PROPOSED DEVELOPMENT

2.1 Introduction

2.1.1 The following is a summary of the information on the Proposed Development and its site and surroundings prepared by the Applicant and included in their Scoping Report. The information has not been verified and it has been assumed that the information provided reflects the existing knowledge of the Proposed Development and the potential receptors/ resources.

2.2 Description of the Proposed Development

2.2.1 The Applicant's description of the Proposed Development, its location and technical capacity (where relevant) is provided in Scoping Report Sections 1 to 3.

2.2.2 The Proposed Development comprises a western extension to the existing and currently active hazardous waste and low-level radioactive waste landfill site (the existing landfill site is hereafter referred to as the "existing ENRMF site"). The western extension includes the construction of a new landfill void, and the alteration of the restoration profile and timescale for the completion of the existing ENRMF site, to integrate the final landscape of the existing ENRMF site with the western extension. The DCO application will include an increase in consented waste input to the existing waste treatment and recover facility and an increase in the total waste input to the site. It will also include for the alteration of the operation period of the current activities and the western extension to approximately 2046.

2.2.3 The proposed application site lies approximately 1.7km east south east of Duddington village and approximately 2.6km north of Kings Cliffe village in the East Northamptonshire district of Northamptonshire. Figure 4 presents the DCO application site boundary, which includes both the existing ENRMF site and the western extension. Figures 1 and 2 show the location of the existing ENRMF site in the context of the wider area.

2.2.4 The location of the Proposed Development is predominantly rural and is surrounded by woodland to the north and west, with arable fields to the south. Stamford Road is located on the eastern boundary and provides access to the existing ENRMF site and the Proposed Development. The existing ENRMF site comprises restored and partially restored landfill areas, stockpile areas, a waste treatment and recovery facility, together with a gas management and surface water management compound, including a flare stack, in the north-western corner. Site infrastructure at the existing ENRMF site includes the site access, welfare facilities, storage areas, laboratories, and wheel and vehicle body washing facilities (as shown on Figure 3 to the Scoping Report). The site of the western extension comprises arable fields with grassy margins, with a hedgerow dividing two fields. There is also an area of young scrubby woodland within the western extension and an existing farm access track.

2.3 The Planning Inspectorate's Comments

Description of the Proposed Development

2.3.1 The ES should include the following:

- a description of the Proposed Development comprising at least the information on the site, design, size and other relevant features of the development; and
- a description of the location of the development and description of the physical characteristics of the whole development, including any requisite demolition works and the land-use requirements during construction and operation phases.

2.3.2 The Scoping Report lists existing infrastructure at the site, stating that "*site infrastructure will be retained and adapted as associated development and ancillary activities to the main site activities*"; however, it contains limited information at this stage with regards to the site infrastructure. For example, it does not specify the likely heights of infrastructure such as buildings and the gas flare stack, and whether such infrastructure would remain in its current location or would be relocated as part of the design of the Proposed Development. Notwithstanding that the design for the Proposed Development is still to be progressed, and that a Rochdale Envelope approach is proposed (as discussed below), the ES should provide a description of the whole development, including design, size and land-use requirements. The parameters for the Proposed Development, including the height of infrastructure and fencing, should be specified in the draft DCO (dDCO) and the assessment presented in the ES should be based on the worst-case scenario applicable to the specified parameters.

2.3.3 The Scoping Report refers interchangeably to the "waste treatment and recovery facility", "waste treatment facility", "treatment facility" and "treatment plant". The ES should use clear and consistent terminology and definitions to avoid confusion. It is also unclear from the reference to the proposed assessment of decommissioning of the waste treatment facility, whether other site infrastructure not included in this facility will also be decommissioned. The ES should make clear the details of the Proposed Development and the scope of the assessment of decommissioning.

2.3.4 The Inspectorate notes that the existing facility would continue to operate during construction and operation of the proposed extension. It is unclear how the division of activities necessary for construction or operation will be defined. The ES should explain clearly which activities relate to construction and which relate to operation of the Proposed Development. The Scoping Report also states that the Proposed Development will be developed in phases, therefore construction and operation will occur simultaneously on the Proposed Development site. The ES should include a detailed phasing plan to depict the likely sequencing of construction and operational phases at the Proposed Development and to ensure that the assessment is robust in this regard.

- 2.3.5 The ES should clearly state the assumptions made in respect to the phasing and how the DCO would change the phasing of development from that included in the extant DCO for the existing ENRMF site. If there is uncertainty or if flexibility is required with regards to phasing, the assessment should be based on a worst-case scenario.
- 2.3.6 The Scoping Report makes no reference to potential sources of lighting at the Proposed Development, including any changes to lighting at the existing ENRMF site, and whether this will be assessed in the ES. The ES should assess potential effects of lighting, during construction, operation and decommissioning, where likely significant effects could occur. The assessment of lighting effects should be included in the relevant aspect chapters, such as the Landscape and Visual Resources and Ecology and Biodiversity aspect chapters. Measures to control or mitigate adverse effects of lighting should be addressed in the ES, including how any measures are secured e.g. through DCO Requirements, as appropriate.
- 2.3.7 The Inspectorate notes that the treatment of hazardous waste at the waste treatment and recovery facility is anticipated to be for a period of approximately 20 additional years, and that it is the Applicant's intention to confirm the duration prior to the DCO submission. The temporal scope of the assessments presented in the ES should be based on the durations specified in the dDCO.
- 2.3.8 It is noted that the western extension of the Proposed Development includes several buried and overhead services. The Applicant's attention is directed to the consultation responses from National Grid PLC and Anglian Water at Appendix 2 to the Opinion. National Grid have confirmed the location of a high-pressure gas pipeline within the Proposed Development and provide advice with regards to consultation and proposed works. Anglian Water have also confirmed the presence of an existing water main within the Proposed Development, together with water mains located in roads on the site boundary. The Inspectorate notes the intention to divert the services crossing the western extension to alternative routes within the Proposed Development boundary. The Applicant should make effort to agree the approach to the diversion with relevant consultation bodies at the earliest opportunity and ensure the ES includes an assessment of the agreed diversions in relevant aspect chapters, where likely significant effects could occur.

Alternatives

- 2.3.9 The EIA Regulations require that the Applicant provide 'A description of the reasonable alternatives (for example in terms of development design, technology, location, size and scale) studied by the developer, which are relevant to the proposed project and its specific characteristics, and an indication of the main reasons for selecting the chosen option, including a comparison of the environmental effects'.
- 2.3.10 The Inspectorate acknowledges the Applicant's intention to consider alternatives within the ES. The Inspectorate would expect to see within the proposed discrete section to the ES details of the reasonable alternatives

studied and the reasoning for the selection of the chosen option(s), including a comparison of the environmental effects.

Flexibility

- 2.3.11 The Inspectorate notes the Applicant's desire to incorporate flexibility into their dDCO for elements of the Proposed Development and its intention to apply a Rochdale Envelope approach for this purpose. Where the details of the Proposed Development cannot be defined precisely, the Applicant should apply a worst-case scenario. The Applicant's attention is drawn to the Inspectorate's Advice Note Nine 'Using the 'Rochdale Envelope'¹, which provides details on the recommended approach to follow when incorporating flexibility into a dDCO.
- 2.3.12 The Applicant should make every attempt to narrow the range of options and explain clearly in the ES which elements of the Proposed Development have yet to be finalised and provide the reasons. At the time of application, any Proposed Development parameters should not be so wide-ranging as to represent effectively different developments. The development parameters will need to be clearly defined in the dDCO and in the accompanying ES. It is a matter for the Applicant, in preparing an ES, to consider whether it is possible to robustly assess a range of impacts resulting from a large number of undecided parameters. The description of the Proposed Development in the ES must not be so wide that it is insufficiently certain to comply with the requirements of Regulation 14 of the EIA Regulations.
- 2.3.13 It should be noted that if the Proposed Development materially changes prior to submission of the DCO application, the Applicant may wish to consider requesting a new scoping opinion.

¹ Advice Note nine: Using the Rochdale Envelope. 2018. Available at:
<https://infrastructure.planninginspectorate.gov.uk/legislation-and-advice/advice-notes/>

3. ES APPROACH

3.1 Introduction

- 3.1.1 This section contains the Inspectorate's specific comments on the scope and level of detail of information to be provided in the Applicant's ES. General advice on the presentation of an ES is provided in the Inspectorate's Advice Note Seven 'Environmental Impact Assessment: Process, Preliminary Environmental Information and Environmental Statements'² and associated appendices.
- 3.1.2 Aspects/ matters (as defined in Advice Note Seven) are not scoped out unless specifically addressed and justified by the Applicant and confirmed as being scoped out by the Inspectorate. The ES should be based on the Scoping Opinion in so far as the Proposed Development remains materially the same as the Proposed Development described in the Applicant's Scoping Report.
- 3.1.3 The Inspectorate has set out in this Opinion where it has/ has not agreed to scope out certain aspects/ matters on the basis of the information available at this time. The Inspectorate is content that the receipt of a Scoping Opinion should not prevent the Applicant from subsequently agreeing with the relevant consultation bodies to scope such aspects/ matters out of the ES, where further evidence has been provided to justify this approach. However, in order to demonstrate that the aspects/matters have been appropriately addressed, the ES should explain the reasoning for scoping them out and justify the approach taken.
- 3.1.4 Where relevant, the ES should provide reference to how the delivery of measures proposed to prevent/ minimise adverse effects is secured through DCO Requirements (or other suitably robust methods) and whether relevant consultation bodies agree on the adequacy of the measures proposed.

3.2 Relevant National Policy Statements (NPSs)

- 3.2.1 Sector-specific NPSs are produced by the relevant Government Departments and set out national policy for NSIPs. They provide the framework within which the Examining Authority (ExA) will make their recommendation to the SoS and include the Government's objectives for the development of NSIPs. The NPSs may include environmental requirements for NSIPs, which Applicants should address within their ES.
- 3.2.2 The designated NPS relevant to the Proposed Development is NPS for Hazardous Waste (NPSHW).

² Advice Note Seven: Environmental Impact Assessment: Process, Preliminary Environmental Information and Environmental Statements and annex. Available from:
<https://infrastructure.planninginspectorate.gov.uk/legislation-and-advice/advice-notes/>

3.3 Scope of Assessment

General

3.3.1 The Inspectorate recommends that in order to assist the decision-making process, the Applicant uses tables:

- to demonstrate how the assessment has taken account of this Opinion;
- to identify and collate the residual effects after mitigation for each of the aspect chapters, including the relevant interrelationships and cumulative effects;
- to set out the proposed mitigation and/ or monitoring measures including cross-reference to the means of securing such measures (eg a dDCO Requirement);
- to describe any remedial measures that are identified as being necessary following monitoring; and
- to identify where details are contained in the Habitats Regulations Assessment (HRA report) (where relevant), such as descriptions of European sites and their locations, together with any mitigation or compensation measures, are to be found in the ES.

Baseline Scenario

3.3.2 The ES should include a description of the baseline scenario with and without implementation of the development as far as natural changes from the baseline scenario can be assessed with reasonable effort on the basis of the availability of environmental information and scientific knowledge.

3.3.3 The Inspectorate notes the proposed baseline will reflect the permitted activities applicable at the existing ENRMF site (ie the operation of the waste treatment facility and landfill with restoration to woodland and grassland by 31 December 2026). The Inspectorate notes the intention for the Proposed Development to affect the extant DCO at the existing ENRMF site. The ES should clearly explain the relationship between the extant DCO and the dDCO for the Proposed Development.

3.3.4 Paragraphs 4.3.1 and 4.19.1 of the Scoping Report refer to additional and cumulative impacts resulting from a change to the baseline due to the Proposed Development. The Inspectorate considers that the Proposed Development and existing ENRMF site are inextricably linked. The reference to "cumulative impacts" in this context is a false distinction. The Inspectorate considers that such impacts should be considered as interrelated and form part of the assessment of the Proposed Development as a whole.

3.3.5 With respect to the cumulative impact assessment and in light of the selected baseline for the assessment, which appears to be a future baseline of permitted activities up to 2026, the ES should clearly state which cumulative developments will be assumed to be under construction or operational as part of the future baseline.

Forecasting Methods or Evidence

- 3.3.6 The ES should contain the timescales upon which the surveys which underpin the technical assessments have been based. For clarity, this information should be provided either in the introductory chapters of the ES (with confirmation that these timescales apply to all chapters), or in each aspect chapter.
- 3.3.7 The Scoping Report does not describe the proposed overarching methodology for the impact assessment but includes the proposed assessment methodology for the agricultural land and soil resources assessment and cultural heritage assessment at Appendices B and C, respectively. The Inspectorate expects the ES to include a chapter setting out the overarching methodology for the assessment, which clearly distinguishes effects that are 'significant' from 'non-significant' effects. Any departure from that methodology should be described in individual aspect assessment chapters.
- 3.3.8 The ES should include details of difficulties (for example technical deficiencies or lack of knowledge) encountered compiling the required information and the main uncertainties involved.

Residues and Emissions

- 3.3.9 The EIA Regulations require an estimate, by type and quantity, of expected residues and emissions. Specific reference should be made to water, air, soil and subsoil pollution, noise, vibration, light, heat, radiation and quantities and types of waste produced during the construction and operation phases, where relevant. This information should be provided in a clear and consistent fashion and may be integrated into the relevant aspect assessments.
- 3.3.10 The Inspectorate notes reference to the import of wastes for restoration purposes and to the continued exportation of clay to the nearby Auegan landfill site at Thornhaugh. The ES should include estimations of quantities and type of such materials and an assessment of potential impacts associated with the import and exports in the relevant aspect chapters, such as the Soil Resources and Agricultural Land Classification and Transport and Traffic aspect chapters, as appropriate.

Mitigation and Monitoring

- 3.3.11 Any mitigation relied upon for the purposes of the assessment should be explained in detail within the ES. The likely efficacy of the mitigation proposed should be explained with reference to residual effects. The ES should also address how any mitigation proposed is secured, with reference to specific DCO Requirements or other legally binding agreements.
- 3.3.12 The ES should identify and describe any proposed monitoring of significant adverse effects and how the results of such monitoring would be utilised to inform any necessary remedial actions.

Risks of Major Accidents and/or Disasters

- 3.3.13 The ES should include a description and assessment (where relevant) of the likely significant effects resulting from accidents and disasters applicable to the Proposed Development. The Applicant should make use of appropriate guidance (e.g. that referenced in the Health and Safety Executives (HSE) Annex to Advice Note 11) to better understand the likelihood of an occurrence and the Proposed Development's susceptibility to potential major accidents and hazards. The description and assessment should consider the vulnerability of the Proposed Development to a potential accident or disaster and also the Proposed Development's potential to cause an accident or disaster. The assessment should specifically assess significant effects resulting from the risks to human health, cultural heritage or the environment. Any measures that will be employed to prevent and control significant effects should be presented in the ES.
- 3.3.14 Relevant information available and obtained through risk assessments pursuant to European Union legislation such as Directive 2012/18/EU of the European Parliament and of the Council or Council Directive 2009/71/Euratom or relevant assessments carried out pursuant to national legislation may be used for this purpose provided that the requirements of this Directive are met. Where appropriate, this description should include measures envisaged to prevent or mitigate the significant adverse effects of such events on the environment and details of the preparedness for and proposed response to such emergencies.

Climate and Climate Change

- 3.3.15 The ES should include a description and assessment (where relevant) of the likely significant effects the Proposed Development has on climate (for example having regard to the nature and magnitude of greenhouse gas emissions) and the vulnerability of the project to climate change. Where relevant, the ES should describe and assess the adaptive capacity that has been incorporated into the design of the Proposed Development. This may include, for example, alternative measures such as changes in the use of materials or construction and design techniques that will be more resilient to risks from climate change.

Transboundary Effects

- 3.3.16 Schedule 4 Part 5 of the EIA Regulations requires a description of the likely significant transboundary effects to be provided in an ES.
- 3.3.17 The Scoping Report concludes that the Proposed Development is not likely to have significant effects on another European Economic Area (EEA) State and proposes that transboundary effects do not need to be considered within the ES.
- 3.3.18 Having considered the nature and location of the Proposed Development, the Inspectorate is not aware that there are potential pathways of effect to other EEA states but recommends that, for the avoidance of doubt, the ES details any such consideration and assessment.

A Reference List

- 3.3.19 A reference list detailing the sources used for the descriptions and assessments must be included in the ES.

3.4 Coronavirus (COVID-19) Environmental Information and Data Collection

- 3.4.1 The Inspectorate understands government enforced measures in response to COVID-19 may have consequences for an Applicant's ability to obtain relevant environmental information for the purposes of their ES. The Inspectorate understands that conducting specific surveys and obtaining representative data may be difficult in the current circumstance.
- 3.4.2 The Inspectorate has a duty to ensure that the environmental assessments necessary to inform a robust DCO application are supported by relevant and up-to-date information. Working closely with consultation bodies, the Inspectorate will seek to adopt a flexible approach, balancing the requirement for suitable rigour and scientific certainty in assessments with pragmatism in order to support the preparation and determination of applications in a timely fashion.
- 3.4.3 Applicants should make effort to agree their approach to the collection and presentation of information with relevant consultation bodies. In turn, the Inspectorate expects that consultation bodies will work with Applicants to find suitable approaches and points of reference to allow preparation of applications at this time. The Inspectorate is required to take into account the advice it receives from the consultation bodies and will continue to do so in this regard.

3.5 Confidential and Sensitive Information

- 3.5.1 In some circumstances it will be appropriate for information to be kept confidential. In particular, this may relate to personal information specifying the names and qualifications of those undertaking the assessments and/ or the presence and locations of rare or sensitive species such as badgers, rare birds and plants where disturbance, damage, persecution or commercial exploitation may result from publication of the information.
- 3.5.2 Where documents are intended to remain confidential the Applicant should provide these as separate electronic documents with their confidential nature clearly indicated in the title and watermarked as such on each page. The information should not be incorporated within other documents that are intended for publication or which the Inspectorate would be required to disclose under the Environmental Information Regulations 2004.

- 3.5.3 The Inspectorate adheres to the data protection protocols set down by the Information Commissioners Office³ . Please refer to the Inspectorate’s National Infrastructure privacy notice⁴ for further information on how personal data is managed during the Planning Act 2008 process.

³ <https://ico.org.uk>

⁴ <https://infrastructure.planninginspectorate.gov.uk/help/privacy-notice/>

4. ASPECT BASED SCOPING TABLES

4.1 Population including impacts on human health

(Scoping Report Section 4.2)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
4.1.1	N/A	N/A	No matters have been proposed to be scoped out of the assessment.

ID	Ref	Other points	Inspectorate's comments
4.1.2	Paragraph 4.2.4	Study area and Zone of Influence (ZoI) for sensitive receptors	The Scoping Report identifies that assessments of risk to the public and workers at the site will be undertaken. The ES should identify and provide justification for the study area and Zone of Influence (ZoI) used to determine the sensitive receptors for the assessment.
4.1.3	N/A	Cross-referencing	The ES should include appropriate cross-references to relevant assessments presented in other aspect chapters that have been used to inform the assessment of effects to population and human health, such as effects of dust, to be presented in the Air Quality and Dust aspect chapter and effects to surface water and groundwater, to be presented in the Water Resources aspect chapter. Other relevant aspect chapters may include Noise, Transport and Traffic, and Socio-economic impacts.

4.2 Ecology and Biodiversity

(Scoping Report Section 4.3)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
4.2.1	N/A	N/A	No matters have been proposed to be scoped out of the assessment.

ID	Ref	Other points	Inspectorate's comments
4.2.2	Paragraphs 4.3.1 and 4.13.2	Birds and Bird Hazard Management Plan	The Inspectorate notes reference to bird surveys undertaken at the Proposed Development to date and the intention to include an assessment of impacts within the site and immediate vicinity. The Applicant's attention is directed to the comments of the Ministry of Defence (MoD) at Appendix 2 in relation to the proximity of the Proposed Development to RAF Wittering. The ES should assess the impact to the aerodrome's operations from increased numbers of birds/flocking birds to the area during construction, operation and/or restoration, particularly where exposed earthworks are created. If the Proposed Development results in increased bird numbers in proximity to the aerodrome this should be assessed. The Applicant should address the need for a Bird Hazard Management Plan (BHMP) to ensure that appropriate measures are in place to address any significant effects. There is also the potential for significant effects of this sort associated with the restoration plans. The Applicant should make effort to agree the restoration plans with relevant consultation bodies including the MoD.
4.2.3	Paragraphs 4.3.2 and 4.3.4	Mitigation and enhancement measures and management/ action plans	The ES should include or refer to an appropriate draft restoration and management plan and/or action plan with respect to ecology and biodiversity, such as a draft Ecological and Landscape Management Plan and/or Biodiversity Action Plan. The plan(s) should include information on proposed ecological mitigation and enhancement

ID	Ref	Other points	Inspectorate's comments
			<p>measures for the Proposed Development, together with proposed management and monitoring measures.</p> <p>The Applicant should make effort to ensure the landscape design avoids habitat fragmentation and provides green corridors for the movement of species where possible.</p> <p>The Inspectorate welcomes the intention to discuss the habitats to be included in the restoration proposals with Natural England. The Applicant should also make effort to agree the restoration with other relevant consultation bodies, such as the County Ecologist at Northamptonshire County Council (NCC) and the MoD.</p>
4.2.4	Paragraph 4.3.3	Study area and ZoI	<p>The Scoping Report states the assessment will include impacts within the area of the site and in the immediate vicinity of the site, as well as potential for impacts on designated sites in the vicinity as shown on Figure 2. It is noted that Appendix A lists also statutory and non-statutory designated sites within a wider area.</p> <p>The ES should clearly define the study area and ZoI for the Proposed Development, with reference to potential effect pathways.</p>
4.2.5	Paragraph 4.3.3 and Figure 2	Ancient woodland, Plantations on Ancient Woodland Sites (PAWS) and veteran trees	<p>The ES should include an assessment of effects on woodland, PAWS and veteran trees, where likely significant effects could occur. The Applicant is directed to the standing advice of the Forestry Commission and Natural England, as linked within their consultation responses at Appendix 2 to this Opinion. The ES should consider potential effects such as root damage, water availability to woodlands, potential contamination of groundwater, and effects on sensitive species within the woodlands. Appropriate cross-referencing to assessments within other relevant aspect chapters, such as the Water Resources and Soil Resources and Agricultural Land Classification, should be included.</p>
4.2.6	N/A	Trees and hedgerows	<p>The results of the tree survey undertaken in accordance with BS5837:</p>

ID	Ref	Other points	Inspectorate's comments
			<p>2012 (Trees in relation to construction), Arboricultural Impact Assessment, including tree schedule and constraints plan, should be appended to the ES where it is relevant to the assessment of significant effects.</p> <p>The ES should include figures presenting retained vegetation (including hedgerows and trees) and information on the protection of existing vegetation during construction, operation and restoration activities.</p>
4.2.7	N/A	Restoration at the existing ENRMF site	<p>The ES should clearly explain whether and how the current permitted proposals for restoration to woodland and grassland at the existing ENRMF site will differ as a result of Proposed Development. The proposals for restoration at the Proposed Development in its entirety should be described and assessed where significant effects are likely.</p>

4.3 Landscape and Visibility / Visual Resources

(Scoping Report Section 4.4)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
4.3.1	N/A	N/A	No matters have been proposed to be scoped out of the assessment.

ID	Ref	Other points	Inspectorate's comments
4.3.2	Paragraph 4.4.1	National and local landscape character areas	The ES should include details of the relevant local landscape character areas and National Character Areas, and these should be presented on figures at an appropriate size and scale relevant to the Proposed Development. Relevant management plans or strategies for the local character areas should also be referenced. A Landscape Character Assessment should be undertaken, following the Landscape Institute and the Institute of Environmental Assessment and Management <i>Guidelines for Landscape and Visual Impact Assessment</i> (2013, 3rd edition).
4.3.3	Paragraph 4.4.2, Figure 7	Representative viewpoints and Zone of Theoretical Visibility (ZTV)	<p>The Scoping Report outlines discussions undertaken with NCC to agree representative viewpoint locations. These are illustrated in Figure 7 to the Scoping Report. The Inspectorate also notes that a ZTV has been prepared.</p> <p>The Inspectorate welcomes the discussion with the Local Authority in effort to agree the landscape and visual impact assessment viewpoints and their illustration. The Inspectorate considers that effort should also be made to agree the ZTV. The ES should include a figure showing the ZTV for the Proposed Development and include viewshed analysis; with all individual residential properties, Public Rights of Way (PRoW) and roads within the ZTV identified, named and recorded with the level of visual impact attributed.</p>

ID	Ref	Other points	Inspectorate's comments
4.3.4	Paragraph 4.4.2	Viewpoint photographs	<p>The Scoping Report states that initial viewpoint photographs have been taken and that work is continuing to establish the baseline.</p> <p>The ES should include suitable viewpoint photographs, along with 3-D wireframe views. The Applicant should consider the approach set out in the Landscape Institute <i>Technical Guidance Note 06/19</i> when submitting visual representations. Appropriate consideration should be given to seasonal variations when preparing photographs and visualisations to inform the ES.</p>
4.3.5	Paragraphs 4.4.3 and 4.4.4	Visualisations, mitigation measures and reinstatement	<p>The Applicant should make effort to agree with relevant consultation bodies the need for a figure and/or pictorial 3-D rendering of the operational and reinstated development. The inclusion of which may give greater appreciation of the likely visual impacts and proposed mitigation. Details of proposed screen planting, bunding (including slope profiles/sections) and screening should be provided. The mitigation relied upon in the assessment should be specified in the ES and appropriately secured.</p>

4.4 Soil Resources and Agricultural Land Classification

(Scoping Report Section 4.5)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
4.4.1	N/A	N/A	No matters have been proposed to be scoped out of the assessment.

ID	Ref	Other points	Inspectorate's comments
4.4.2	Paragraph 4.5.4	Stripping and storing of soils	The Scoping Report states that all soils in the extension area will be stripped and stored in accordance with best practice. The ES should reference the best practice guidance to be followed and how these measures are secured. The measures should be specified in appropriate management plans for the Proposed Development. The ES should include or refer to relevant Outline Management Plans applicable to the dDCO. The Applicant should make effort to agree appropriate measures with relevant consultation bodies.
4.4.3	Paragraph 4.5.4	Restoration of the site and cross-referencing	The Scoping Report explains that the Proposed Development will ultimately be restored to habitats with a nature conservation interest rather than to agriculture which has a lower biodiversity potential. The ES should ensure appropriate cross referencing is included between the Soil Resources and Agricultural Land Classification and Ecology and Biodiversity aspect chapters, as required.

4.5 Cultural Heritage

(Scoping Report Section 4.6)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
4.5.1	N/A	N/A	No matters have been proposed to be scoped out of the assessment.

ID	Ref	Other points	Inspectorate's comments
4.5.2	Paragraph 4.6.4	Methodology for the assessment of the setting of heritage assets	<p>The Scoping Report notes that potential impacts on the setting of designated heritage assets will be assessed but provides no details of how such assessment will be undertaken.</p> <p>The ES should detail the assessment methodology applied to the setting of heritage assets. The assessment should be undertaken in conjunction with the landscape and visual impact assessment and appropriate cross-references between the aspect chapters should be included. The assessment should make reference to the ZTV Modelling undertaken for the landscape and visual impact assessment. The Applicant should also seek to agree any photo viewpoint locations with relevant statutory consultation bodies, such as Historic England and the local authority archaeological advisor, as appropriate. Depending on the results of the further investigation it may also be necessary to consider impacts on settings of non-designated heritage assets too.</p>
4.5.3	Paragraph 4.6.5	Results of geophysical survey	The Inspectorate notes reference to the geophysical survey that has been undertaken to date, including the presence of a rectangular enclosure in the northern part of the Proposed Development. The ES should be accompanied by the geophysical data and interpretation.
4.5.4	Paragraph 4.6.7	Published guidance	The Scoping Report mentions the EIA Regulations 2017, National Planning Policy Framework 2019, and <i>The Setting of Heritage Assets</i> :

ID	Ref	Other points	Inspectorate's comments
			<p><i>Historic Environment Good Practice Advice in Planning Note 3 (2nd Edition)</i> (Historic England 2017).</p> <p>The ES should also refer to the Design Manual for Roads and Bridges (DMRB) <i>LA 104 Environmental Assessment and Monitoring</i>, and <i>LA 106 Cultural Heritage Assessment</i> (2020), <i>Standard and Guidance for Historic Environment Desk-Based Assessment</i> (Chartered Institute for Archaeologists 2014, revised 2017), and <i>Conservation Principles, Policies and Guidance for the Sustainable Management of the Historic Environment</i> (Historic England 2008).</p> <p>Other relevant regional sources include <i>The Archaeology of the East Midlands: An Archaeological Resource Assessment and Research Agenda</i> (2006, revised 2012), <i>The Northamptonshire National Mapping Programme</i> (2003, revised 2008), and <i>Mapping Ancient Landscapes in Northamptonshire</i> (Deegan and Foard 2008).</p>
4.5.5	Paragraph 4.6.7, Appendix C	Proposed cultural heritage assessment methodology	<p>Appendix C of the Scoping Report outlines the proposed cultural heritage assessment methodology. In paragraph C6 of Appendix C there is a matrix setting out categories of sensitivity, in paragraph C8 one illustrating criteria for assessing magnitude of change, and paragraph C9 a matrix for assessing significance.</p> <p>The system for assessing sensitivity and significance of effect on heritage assets is different to standard matrixes based on that used in the Design Manual for Roads and Bridges (e.g. DMRB – <i>LA 104 Environmental Assessment and Monitoring</i>, Table 3.8.1). The proposed matrix in C9 appears to place greater emphasis on non-significant effects, whilst having no Slight and no Medium/Moderate impacts at all. The Applicant should ensure that the assessment the ES addresses impacts fairly and does not disproportionately favour the reporting of non-significant effects.</p>
4.5.6	N/A	Relevant heritage legislation	The Scoping Report does not mention key heritage legislation including The Ancient Monuments and Archaeological Areas Act 1979,

ID	Ref	Other points	Inspectorate's comments
			The Planning (Listed Buildings and Conservation Areas) Act 1990, The Burial Act 1997, and The Treasure Act 1996. The ES should also refer to these.

4.6 Water Resources

(Scoping Report Section 4.7)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
4.6.1	N/A	N/A	No matters have been proposed to be scoped out of the assessment.

ID	Ref	Other points	Inspectorate's comments
4.6.2	Section 4.7	Sensitive receptors	At this stage, the Scoping Report does not expand on the likely sensitive receptors for the Water Resources aspect chapter. The ES should clearly identify the sensitive receptors, with reference to the ZoI for the Proposed Development.
4.6.3	Paragraph 4.7.1 to 4.7.10	Studies, surveys and site investigations	The Inspectorate notes and welcomes the current and ongoing studies, surveys and site investigations proposed to inform the baseline, design, and impact assessment (including mitigation measures and monitoring) for the Proposed Development. The ES should present the information used to inform the assessment, including figures at an appropriate size and scale.
4.6.4	Paragraph 4.7.11	Water Framework Directive (WFD)	The Applicant's attention is directed to advice contained in the Planning Inspectorate's Advice Note 18 in respect of WFD. The Inspectorate supports the preparation and submission of separate WFD assessment reports by Applicants, which clearly explain how the requirements of WFD have been met.

4.7 Flood Risk Assessment

(Scoping Report Section 4.8)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
4.7.1	N/A	N/A	No matters have been proposed to be scoped out of the assessment.

ID	Ref	Other points	Inspectorate's comments
4.7.2	Paragraph 4.8.1	Flood Risk Assessment (FRA)	<p>The Scoping Report states that an FRA will be prepared, which will focus on surface water flows and movement as a result of the Proposed Development. No further information is provided on the proposed methodology and no figure is provided to show existing watercourses/waterbodies.</p> <p>The ES should be supported by the results of the FRA. The ES should present the baseline conditions, sensitive receptors, assessment methodology, and the potential effects on the receiving environment from the Proposed Development, together with impacts to the Proposed Development from flood risk. The ES should be informed by the FRA and consider all potential sources of flooding, including sewer flooding, where likely significant effects could occur. Mitigation measures, including the proposed drainage for the Proposed Development should also be presented.</p>
4.7.3	Paragraph 4.8.1	Climate change projections and flood risk	<p>The Scoping Report states that in undertaking the assessment, consideration will be given to the potential effect of climate change on the intensity of storm events. No mention is made of UK Climate Change Projections (UKCP18) – the most up-to-date assessment of climate change used in National Planning Policy Guidance (NPPG) on Flood Risk Assessment and Climate Change Allowances.</p> <p>The ES should include detailed reference to these projections and</p>

ID	Ref	Other points	Inspectorate's comments
			associated data, in particular the regional studies, and effort should be made to agree the approach adopted with the relevant consultation bodies, including the Environment Agency (EA).

4.8 Transport and Traffic

(Scoping Report Section 4.9)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
4.8.1	N/A	N/A	No matters are proposed to be scoped out the assessment.

ID	Ref	Other points	Inspectorate's comments
4.8.2	4.9.2	Transport Assessment and ES chapter	<p>The Scoping Report refers to the production of a Transport Assessment, which will be carried out in accordance with the Ministry of Housing, Communities and Local Government (2014) <i>Travel Plans, Transport Assessments and Statements Guidance</i>. The ES should use the Institute of Environmental Assessment (IEA) <i>Guidelines for the Assessment of the Environmental impact of Road Traffic</i> and relevant traffic and transport assessment advice contained in the NPSHW to inform the assessment. Additionally, Highways England (HE) recommend the Transport Assessment be carried out with reference to the Department for Transport (DfT) '<i>Guidance on Transport Assessment (GTA)</i>' and in accordance with DfT Circular 02/2013 (<i>The Strategic Road Network and the Delivery of Sustainable Development</i>).</p> <p>The Inspectorate welcomes the proposal to agree the scope of the Transport Assessment with NCC. The Applicant should make effort to agree the approach to the Transport Assessment with all relevant consultation bodies, including both NCC and HE.</p> <p>The Inspectorate notes the consultation response from HE in relation to the proximity of the A47 and A1 (specifically the A1/A47 dumbbell roundabout and the A1/A43 junction). The ES should assess any likely significant effects resulting from increased traffic at these junctions. The Applicant should make effort to agree the approach to the</p>

ID	Ref	Other points	Inspectorate's comments
			assessment with relevant consultation bodies.
4.8.3	N/A	Study area and ZoI	The Scoping Report does not identify the chosen study area or ZoI. The ES should provide a clear justification as to why the study area chosen is sufficient to address the extent of the likely ZoI and impacts resulting from the Proposed Development. The Applicant should make effort to agree the study areas with relevant consultation bodies including, NCC and HE.
4.8.4	N/A	PRoW	The ES should clarify whether impacts to PRoW, including bridleways and byways, would occur as a result of the Proposed Development. Any impacts on PRoW and the wider network of routes which could result in significant effects should be assessed. The aspect chapter should also cross-refer to the assessment of effects on PRoW where presented in other relevant ES chapters, such as the Population including impacts on human health, Landscape and Visual Resources, Air Quality and Dust, and Noise aspect chapters, as appropriate.
4.8.5	N/A	Baseline data	The Scoping Report does not contain any details of the baseline traffic and transport movements, nor does it identify the potential sources of such information. The baseline environment should be provided within the ES, along with a justification for the study area and details of the data used to inform the baseline.
4.8.6	Paragraph 4.9.2	Traffic movements	<p>The ES should explain how many vehicle movements are expected to be generated during operation, both from staff travelling to and from the Proposed Development and the Heavy Goods Vehicles (HGVs) used for the import of wastes and export of soils during operation and construction, and assess impacts where a likely significant effect may occur.</p> <p>An assessment should also be provided, for the construction and operational period, of other vehicle trips that will be generated, including employees' vehicles and ancillary vehicle movements. A</p>

ID	Ref	Other points	Inspectorate's comments
			<p>clear breakdown should be provided of the numbers of trips that will be generated by vehicle type.</p> <p>A comparison should be presented between the existing operations and the future operations.</p>
4.8.7	Paragraph 4.9.3	Worst-case scenario	<p>The Inspectorate welcomes the assessment of transport impacts based upon the likely transport movements associated with the development working at its maximum capacity.</p> <p>Where uncertainty exists, the ES should assess the maximum parameters of the Proposed Development to ensure a worst-case scenario has been captured and this should reflect the maximum parameters permitted in the dDCO.</p>
4.8.8	N/A	Cumulative effects	<p>The Inspectorate notes that there will be overlap with operational traffic associated with the current site and construction traffic associated with the Proposed Development. It is also noted that the existing ENRMF site and proposed waste management facilities will be operational at the same time. The ES should describe and assess the transport impacts that could occur during these scenarios. The potential for cumulative traffic impacts with other developments should also be assessed, where significant effects are likely.</p>
4.8.9	N/A	Cross-referencing	<p>Impacts from transport and traffic overlap with impacts from other aspects such as air quality, noise, and ecology. It should be clear within the ES how the outcomes of the traffic modelling have informed other relevant assessments and appropriate cross-referencing should be between relevant aspect chapters. The ES should explain the nature of the interaction and where potential impacts have been assessed.</p>

4.9 Noise and Vibration

(Scoping Report Section 4.10)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
4.9.1	Paragraph 4.10.1 and Table 2	Vibration effects	The Inspectorate does not consider that the Scoping Report provides a robust justification supporting a decision to scope this matter out of the assessment. The Inspectorate notes that vibration effects are created by sources other than blasting, such as HGV movements. The traffic movements during construction and have not yet been established and therefore impacts from vibration may occur in proximity to sensitive receptors. The ES should assess impacts associated with operational vibration from increased HGV movements where significant effects are likely to occur.
4.9.2	Paragraph 4.10.6 and Table 2	Assessment of road traffic noise	The Inspectorate does not consider that the Scoping Report provides a robust justification to support a decision to scope this matter out of the assessment, as no indication of traffic movements has been provided. The Applicant should provide an assessment of road traffic noise where significant effects are likely to occur.

ID	Ref	Other points	Inspectorate's comments
4.9.3	Paragraph 4.10.4	Study area	The study area used to identify the sensitive receptors should be determined based on the extent of the likely impacts (ie ZoI) rather than set distances, which may result in receptors being omitted from consideration in the assessment. The ES should include a justification in support of the selected study area with reference to the ZoI for the Proposed Development.
4.9.4	Paragraph	Consultation	The Inspectorate welcomes the proposal for the scope of the assessment to be agreed with East Northamptonshire District Council,

ID	Ref	Other points	Inspectorate's comments
	4.10.5		NCC and the EA. The Applicant should seek to agree the methodology, study area and choice of noise receptors with relevant consultation bodies.
4.9.5	Paragraph 4.10.6	Legislation, policy and guidance	The Applicant should make effort to agree the approach to the assessment with relevant consultation bodies, however, the Inspectorate agrees with the guidance outlined in Paragraph 4.10.6.
4.9.6	Paragraph 4.10.5	Baseline	<p>The Scoping Report proposes to use the 2011 monitoring locations for the noise assessment. Additionally, the Scoping Report states that the 2011 monitoring data would be used, should monitoring of representative baseline noise levels for the current baseline conditions be not possible.</p> <p>The Inspectorate considers that baseline conditions for the assessment should be accurate and based on reliable and up-to-date data, but as noted in Section 3.4 of the Opinion above, also recognises the potential difficulties associated with the collection of representative data in the current circumstance.</p> <p>The Applicant's attention is directed to the Joint Guidance produced by the Association of Noise Consultants (ANC) and the Institute of Acoustics (IoA) '<i>Joint Guidance on the Impact of COVID-19 on the Practicality and Reliability of Baseline Sound Level Surveying and the Provision of Sound & Noise Impact Assessments during the current COVID-19 pandemic</i>', which is included in the response from East Northamptonshire District Council at Appendix 2 to this Opinion. The ES should provide a clear justification with regards to the baseline monitoring used for the impact assessment. The ES should also explain whether noise monitoring has been carried out to the relevant British Standards guidelines (eg BS7445).</p>
4.9.7	N/A	Assessment of construction noise	It is unclear whether the Applicant intends to carry out an assessment of construction noise as part of the assessment. The Scoping Report

ID	Ref	Other points	Inspectorate's comments
			states that the Proposed Development will comprise the construction of the existing and new landfill void, and that the voids will be constructed in phases. There is limited information in the Scoping Report to identify what the construction activities will precisely comprise, over what duration, and whether these will generate significant construction noise. The definition of construction activities, their extent and duration should be defined in the ES. Where construction activities have the potential to result in likely significant effects, the Inspectorate would expect to see a construction noise assessment within the ES. The ES should include a full description of noise generating works likely to occur during the construction of the Proposed Development.
4.9.8	N/A	Assessment of operational noise	Noise sources generated during operation should be identified and assessed. Where appropriate, effective measures should be provided to mitigate against noise nuisance.
4.9.9	N/A	Hours of operation	The Inspectorate notes the statement in the Scoping Report that the operational hours of the site will not change from those already permitted. The ES should describe the proposed hours of operation, and in particular, assess any potential noise impacts at night and other unsocial hours such as weekends and public holidays.
4.9.10	N/A	Assumptions and limitations	The ES should clearly explain any assumptions made relevant to the assessment, particularly those that relate to the Transport Assessment and the inclusion of other developments in the cumulative impact assessment, and how these have been considered in the Noise aspect chapter.
4.9.11	N/A	Cross-referencing	The inter-relationship between identified noise effects and other relevant environmental aspects (eg Ecology and Biodiversity) should be described and assessed. Appropriate cross-referencing between aspect chapters should be included.

ID	Ref	Other points	Inspectorate's comments
4.9.12	Paragraph 4.10.6	Mitigation	<p>The Inspectorate welcomes the proposal for a noise management and monitoring scheme. The ES should describe any mitigation measures required to reduce noise impacts from the Proposed Development. In addition, consideration should be given to monitoring noise complaints. Mitigation measures should be detailed in the ES and secured, as appropriate, through the Requirements of the dDCO. The Applicant is encouraged to submit Outline Management Plans, such as an Outline Construction Environmental Management Plan (CEMP) to ensure the delivery of noise mitigation measures of this nature.</p>

4.10 Air Quality and Dust

(Scoping Report Section 4.11)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
4.10.1	Paragraph 4.11.1 and Table 2	Assessment of air quality associated with traffic	<p>The Scoping Report proposes to scope out an assessment of the effects associated with operational traffic. The Inspectorate considers that there is currently insufficient evidence provided within the Scoping Report with regards to the likely vehicle movements associated with the Proposed Development to support the scoping out of an air quality assessment associated with traffic.</p> <p>The need for an air quality assessment should be informed by the Transport Assessment and the Transport and Traffic ES chapter, particularly with regards to the potential impact from vehicle movements during both construction and operation of the Proposed Development. An assessment of air quality effects associated with traffic should be presented, where significant effects are likely to occur.</p>
4.10.2	Paragraph 4.11.3 and Table 2	Assessment of PM ₁₀	<p>The Scoping Report proposes to scope out consideration of particulate matter. The Inspectorate does not consider that there is sufficient evidence provided in the Scoping Report to support a decision to scope this matter out of the assessment.</p> <p>The Inspectorate considers that the ES should include an assessment of impacts associated with all relevant pollutants under the EU ambient air quality directive, including increased particulate matter (PM₁₀ and PM_{2.5}), resulting from the Proposed Development. In determining significance, the assessment should consider performance against relevant limit values.</p>

ID	Ref	Other points	Inspectorate's comments
4.10.3	Paragraph 4.11.2	Methodology	<p>The Scoping Report does not outline the methodology that will be used within the ES air quality assessment. The methodology in the ES should clearly state how significant effects will be determined and the Applicant should make effort to agree the methodology with the relevant consultation bodies.</p> <p>In addition to using the Institute of Air Quality Management (IAQM) Guidance on the Assessment of Mineral Dust Impacts for Planning 2016 v1.1 as stated in the Scoping Report, the Applicant should also consider utilising the IAQM Guidance on land-use planning and development control: Planning for air quality 2017 v1.2 and the IAQM Assessment of dust from demolition and construction 2014 Guidance when assessing the impact from dust and particulate matter during construction and decommissioning.</p>
4.10.4	N/A	Sensitive receptors	<p>The Scoping Report does not identify any human receptors which may be affected by the impacts of the Proposed Development on air quality. The ES should clearly set out the type and quantity of both human and ecological receptors that could be affected and identify their locations by reference to a figure.</p> <p>The Applicant should make effort to agree the receptors to be included in the impact assessment with East Northamptonshire District Council, NCC and other relevant consultation bodies, such as Natural England. If no human receptors are likely to be affected, then the ES should provide adequate justification.</p> <p>The assessment should assess the implications on nearby designated sites, including the Collyweston Great Wood and Easton Hornstocks Site of Special Scientific Interest (SSSI) and National Nature Reserve (NNR) and the Wittering Coppice Ancient Woodland. Appropriate cross-reference should be made to the Ecology and Biodiversity aspect chapter of the ES.</p>

ID	Ref	Other points	Inspectorate's comments
4.10.5	N/A	Study area	The Applicant should make effort to agree the study area with the relevant consultation bodies.
4.10.6	N/A	Baseline monitoring	The Inspectorate notes that monitoring is already undertaken at the existing ENRMF site and there is an expectation that monitoring of air quality will continue for the Proposed Development. The ES should detail the scope of the monitoring at the Proposed Development, together with any measures that will be in place to avoid or reduce adverse air quality effects.
4.10.7	Paragraph 4.11.2	Waste types and quantities expected	The ES should clearly describe the anticipated waste types and quantities expected at the landfill and explain how these have been factored into the landfill gas and odour assessments on a worst-case basis.
4.10.8	N/A	Construction dust	The Scoping Report does not mention an assessment of air quality impacts during construction. Noting the current lack of clarity with regards to construction activities, the Inspectorate considers that an assessment of air quality impacts during the construction phase, including impacts from construction traffic, should be provided in the ES where likely significant effects could occur.
4.10.9	N/A	Construction plant emissions	The Scoping Report does not mention the number, size and type of plant machinery required for construction and therefore the potential air quality impacts of this machinery are unknown. The Inspectorate considers that impacts to air quality from construction plant should be assessed where significant effects are likely to occur.
4.10.10	N/A	Gas flare	The ES should provide an estimate of the frequency and duration of emissions through the gas flare.

ID	Ref	Other points	Inspectorate's comments
4.10.11	N/A	Cross-referencing	The ES should include appropriate cross-referencing between the Air Quality and Dust aspect chapter and aspect chapters such as Ecology and Biodiversity and Population including impacts on human health.

4.11 Climate Change

(Scoping Report Section 4.12)

ID	Ref	Applicant's proposed aspect to scope out	Inspectorate's comments
4.11.1	Paragraph 4.12	Climate Change aspect chapter	<p>The Inspectorate notes the Applicant's intention to not provide a separate chapter on climate change, but that "<i>the potential effects on the operations and consequential impacts of and on the development site as a result of the predicted effects of climate change will be addressed in the relevant sections as part of the flood risk assessment and the hydrological risk assessment.</i>" The Scoping Report also states that "<i>measures which are included in the development design which comprise or allow adaptation to climate change will be identified and assessed.</i>"</p> <p>The Inspectorate agrees that a separate climate change aspect chapter can be excluded from the ES, provided that an assessment of the likely significant effects on climate arising from the Proposed Development and the vulnerability of the Proposed Development to climate change is clearly described and identified in the relevant aspect chapters of the ES.</p>

ID	Ref	Other points	Inspectorate's comments
4.11.2	N/A	N/A	See comments in Section 3 of this Opinion

4.12 Nuisance

(Scoping Report Section 4.13)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
4.121	Paragraph 4.13.1 and Table 2	Assessment of odour	<p>The Inspectorate does not believe that sufficient justification has been provided at this stage to conclude that there would be no likely significant effects from odour, and as such does not agree that it can be scoped out. The ES should clearly identify the relevant receptors that could be affected by odour, and clearly explain the design and good practice measures that would be in place to mitigate the odour impacts of the Proposed Development. Where significant effects are likely to occur, these should be assessed. For the assessment of odour impacts, the Inspectorate would expect the assessment to follow the methodology set out in the IAQM 'Guidance on the assessment of odour for planning' (2014).</p> <p>Where potentially significant adverse effects are identified appropriate mitigation measures to monitor and address odour complaints during construction and operation should be proposed.</p> <p>The Inspectorate notes from Appendix 4 to the Scoping Report that no separate Nuisance chapter is proposed. The Applicant may wish to consider effects of odour within the Air Quality and Dust aspect chapter and/ or the Population including impacts on human health aspect chapter, as appropriate.</p>
4.122	Paragraph 4.13.2 and Table 2	Assessment of nuisance associated with vermin	<p>The Inspectorate considers that the Proposed Development would not attract vermin in numbers sufficient to result in a likely significant effect and agrees that this matter can be scoped out. However, as noted in the MoD's response at Appendix 2 and at point 4.2.2 to this Opinion above (Ecology and Biodiversity), the ES should consider the potential for attracting birds to the site which could pose a bird strike risk to nearby RAF Wittering. If the Proposed Development results in</p>

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			increased bird numbers in proximity to the aerodrome this should be assessed.
4.123	Paragraph 4.13.3 and Table 2	Assessment of the impact of litter	The Inspectorate is content that the Proposed Development is unlikely to produce litter that would generate a significant effect and that an assessment of the impact of litter can be scoped out of the ES.

ID	Ref	Other points	Inspectorate's comments
4.124	Paragraph 4.13.1	Odour management plan	Should the ES determine that effects of odour require mitigation measures, these should be specified in the ES and be appropriately secured. The Applicant is encouraged to submit an Outline Odour Management Plan for site operations to include the proposed mitigation measures.
4.125	N/A	Monitoring	Consideration should be given to appropriate mitigation measures and to monitoring of dust and odour. Consideration should also be given to monitoring of dust and odour complaints during construction and operation.

4.13 Material Assets

(Scoping Report Section 4.14)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
4.13.1	N/A	N/A	No matters have been proposed to be scoped out of the assessment.

ID	Ref	Other points	Inspectorate's comments
4.13.2	Paragraph 4.14.1	Material asset receptors	The Inspectorate notes and welcomes the intention to assess impacts on material assets, both built and natural assets, in the relevant aspect chapters such as Cultural Heritage, Ecology and Biodiversity, Landscape and Visual Resources, and Soil Resources and Agricultural Land Classification. Appropriate cross-referencing should be included between relevant aspect chapters.

4.14 Socio-economic Impacts

(Scoping Report Section 4.15)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
4.14.1	N/A	N/A	No matters have been proposed to be scoped out of the assessment.

ID	Ref	Other points	Inspectorate's comments
4.14.2	Paragraph 4.15.1	Baseline	In addition to a review of local and national data in a socio-economic context, the baseline should include regional information, as available.
4.14.3	Paragraph 4.15.1	Impact assessment	The ES should provide an assessment of the potential impacts during the entire lifespan of the Proposed Development.
4.14.4	Paragraph 4.15.1	Impact assessment	This aspect chapter should include appropriate cross-reference to other aspect chapters, such as Landscape and Visual Resources, as relevant to the assessment of socio-economic effects.

4.15 Major Accidents

(Scoping Report Section 4.17)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
4.15.1	Paragraph 4.17.1	An assessment of major accidents associated with severe earthquakes, tsunamis, avalanches or natural events such as flooding and sea level rises as a result of climate change	<p>These matters are proposed to be scoped out of the ES on the basis that the site location is not considered potentially vulnerable to these events. The Scoping Report provides no explanation as to why the site is not vulnerable to such events and there is a potential contradiction between the this paragraph and paragraph 4.8.1 in respect to the FRA, which states that consideration will be given to the potential effect of climate change on the intensity of storm events.</p> <p>The ES should address the vulnerability of the Proposed Development to risks of major accidents and/or disasters to the extent that it is relevant to the nature of the development, and where likely significant effects could occur.</p>

ID	Ref	Other points	Inspectorate's comments
4.15.2	Paragraph 4.17.1	Presentation of information on major accidents	The Inspectorate notes the intention to include an assessment of potential impacts associated with possible events and accidents associated with the man-made and natural environments at and around the Proposed Development. It is noted that Appendix D to the Scoping Report does not include a separate Major Accidents aspect chapter and therefore it is not clear where such an assessment would be presented within the ES. The ES should clearly identify where the assessment of major accidents in this context is presented.

4.16 Cumulative Impacts

(Scoping Report Section 4.19)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
4.16.1	N/A	N/A	No matters have been proposed to be scoped out of the assessment.

ID	Ref	Other points	Inspectorate's comments
4.16.2	Paragraph 4.19.1	Cumulative effects between existing ENRMF site and Proposed Development	With reference to paragraph 3.3.4 of this Opinion above, the Inspectorate considers that reference to "cumulative impacts" between the existing ENRMF site and the western extension should be considered as interrelated impacts, forming part of the assessment of the Proposed Development as a whole rather than sitting within the cumulative effects chapter. The cumulative impacts aspect chapter should focus on the cumulative effects of the Proposed Development with other development.
4.16.3	Paragraph 4.19.1	Assessment methodology	The Scoping Report does not explain the proposed cumulative effects assessment methodology or how other developments relevant to the assessment of cumulative effects will be identified, including how the ZoI of 'in the vicinity' has been selected and defined. The ES should set out the proposed methodological approach for the assessment of cumulative effects, taking into account relevant advice (eg the Inspectorate's Advice Note Seventeen: Cumulative Effects Assessment).
4.16.4	Paragraphs 4.19.1 and	Presentation of information	The Inspectorate notes the statement at paragraph 5.2 that each technical aspect chapter will include sub-sections on cumulative effects, but also that the ES will include a separate chapter for

ID	Ref	Other points	Inspectorate's comments
	5.2		cumulative effects. The ES should clearly present the cumulative impact assessment for the Proposed Development and include appropriate cross-references between aspect chapters.

5. INFORMATION SOURCES

5.0.1 The Inspectorate's National Infrastructure Planning website includes links to a range of advice regarding the making of applications and environmental procedures, these include:

- Pre-application prospectus⁵
- Planning Inspectorate advice notes⁶:
 - Advice Note Three: EIA Notification and Consultation;
 - Advice Note Four: Section 52: Obtaining information about interests in land (Planning Act 2008);
 - Advice Note Five: Section 53: Rights of Entry (Planning Act 2008);
 - Advice Note Seven: Environmental Impact Assessment: Process, Preliminary Environmental Information and Environmental Statements;
 - Advice Note Nine: Using the 'Rochdale Envelope';
 - Advice Note Ten: Habitats Regulations Assessment relevant to nationally significant infrastructure projects (includes discussion of Evidence Plan process);
 - Advice Note Twelve: Transboundary Impacts;
 - Advice Note Seventeen: Cumulative Effects Assessment; and
 - Advice Note Eighteen: The Water Framework Directive.

5.0.2 Applicants are also advised to review the list of information required to be submitted within an application for Development as set out in The Infrastructure Planning (Applications: Prescribed Forms and Procedures) Regulations 2009.

⁵ The Planning Inspectorate's pre-application services for applicants. Available from: <https://infrastructure.planninginspectorate.gov.uk/application-process/pre-application-service-for-applicants/>

⁶ The Planning Inspectorate's series of advice notes in relation to the Planning Act 2008 process. Available from: <https://infrastructure.planninginspectorate.gov.uk/legislation-and-advice/advice-notes/>

APPENDIX 1: CONSULTATION BODIES FORMALLY CONSULTED

TABLE A1: PRESCRIBED CONSULTATION BODIES⁷

SCHEDULE 1 DESCRIPTION	ORGANISATION
The Health and Safety Executive	Health and Safety Executive
The National Health Service Commissioning Board	NHS England
The relevant Clinical Commissioning Group	NHS Cambridgeshire and Peterborough
Natural England	Natural England
The Historic Buildings and Monuments Commission for England	Historic England
The relevant fire and rescue authority	Northamptonshire Fire and Rescue
The relevant police and crime commissioner	Northamptonshire Police and Crime Commissioner
The relevant parish councils	Kings Cliffe Parish Council
The relevant parish councils	Duddington-with-Fineshade Parish Council
The relevant parish councils	Collyweston Parish Council
The Environment Agency	The Environment Agency
The relevant highways authority	Northamptonshire County Council
The relevant strategic highways company	Highways England
Public Health England, an executive agency of the Department of Health	Public Health England
The Crown Estate Commissioners	The Crown Estate
The Forestry Commission	Forestry Commission

⁷ Schedule 1 of The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 (the 'APFP Regulations')

SCHEDULE 1 DESCRIPTION	ORGANISATION
The Secretary of State for Defence	Ministry of Defence

TABLE A2: RELEVANT STATUTORY UNDERTAKERS⁸

STATUTORY UNDERTAKER	ORGANISATION
The relevant Clinical Commissioning Group	NHS Cambridgeshire and Peterborough
The National Health Service Commissioning Board	NHS England
Railways	Highways England Historical Railways Estate
Universal Service Provider	Royal Mail Group
Homes and Communities Agency	Homes England
The relevant Environment Agency	The Environment Agency
The relevant water and sewage undertaker	Anglian Water
The relevant public gas transporter	Cadent Gas Limited
The relevant public gas transporter	Last Mile Gas Ltd
The relevant public gas transporter	Energy Assets Pipelines Limited
The relevant public gas transporter	ES Pipelines Ltd
The relevant public gas transporter	ESP Networks Ltd
The relevant public gas transporter	ESP Pipelines Ltd
The relevant public gas transporter	ESP Connections Ltd
The relevant public gas transporter	Fulcrum Pipelines Limited
The relevant public gas transporter	Harlaxton Gas Networks Limited

⁸ 'Statutory Undertaker' is defined in the APFP Regulations as having the same meaning as in Section 127 of the Planning Act 2008 (PA2008)

Scoping Opinion for Proposed East Northants
Resource Management Facility Western Extension

STATUTORY UNDERTAKER	ORGANISATION
The relevant public gas transporter	GTC Pipelines Limited
The relevant public gas transporter	Independent Pipelines Limited
The relevant public gas transporter	Indigo Pipelines Limited
The relevant public gas transporter	Murphy Gas Networks Limited
The relevant public gas transporter	Quadrant Pipelines Limited
The relevant public gas transporter	National Grid Gas Plc
The relevant public gas transporter	Scotland Gas Networks Plc
The relevant public gas transporter	Southern Gas Networks Plc
The relevant electricity distributor with CPO Powers	Eclipse Power Network Limited
The relevant electricity distributor with CPO Powers	Last Mile Electricity Ltd
The relevant electricity distributor with CPO Powers	Energy Assets Networks Limited
The relevant electricity distributor with CPO Powers	ESP Electricity Limited
The relevant electricity distributor with CPO Powers	Fulcrum Electricity Assets Limited
The relevant electricity distributor with CPO Powers	Harlaxton Energy Networks Limited
The relevant electricity distributor with CPO Powers	Independent Power Networks Limited
The relevant electricity distributor with CPO Powers	Leep Electricity Networks Limited
The relevant electricity distributor with CPO Powers	Murphy Power Distribution Limited
The relevant electricity distributor with CPO Powers	The Electricity Network Company Limited
The relevant electricity distributor with CPO Powers	UK Power Distribution Limited

STATUTORY UNDERTAKER	ORGANISATION
The relevant electricity distributor with CPO Powers	Utility Assets Limited
The relevant electricity distributor with CPO Powers	Vattenfall Networks Limited
The relevant electricity distributor with CPO Powers	Western Power Distribution (East Midlands) Plc
The relevant electricity transmitter with CPO Powers	National Grid Electricity Transmission Plc

TABLE A3: SECTION 43 LOCAL AUTHORITIES (FOR THE PURPOSES OF SECTION 42(1)(B))⁹

LOCAL AUTHORITY ¹⁰
East Northamptonshire District Council
Northamptonshire County Council
Huntingdonshire District County
South Kesteven District Council
Wellingborough Borough Council
Kettering Borough Council
Corby Borough Council
Bedford Borough Council
Peterborough City Council
Rutland County Council
Milton Keynes Council
Buckinghamshire County Council
Leicestershire County Council

⁹ Sections 43 and 42(B) of the PA2008

¹⁰ As defined in Section 43(3) of the PA2008

Scoping Opinion for Proposed East Northants
Resource Management Facility Western Extension

LOCAL AUTHORITY¹⁰
Lincolnshire County Council
Cambridgeshire County Council
Oxfordshire County Council
Warwickshire County Council

APPENDIX 2: RESPONDENTS TO CONSULTATION AND COPIES OF REPLIES

CONSULTATION BODIES WHO REPLIED BY THE STATUTORY DEADLINE:
Anglian Water
Duddington-with-Fineshade Parish Council
East Northamptonshire District Council
Environment Agency
Forestry Commission
Health and Safety Executive
Highways England
Historic England
Leicestershire County Council
Ministry of Defence
National Grid Electricity Transmission PLC and National Grid Gas PLC
Natural England
Northamptonshire Fire and Rescue Service
Peterborough City Council
Public Health England
Royal Mail Group
South Kesteven District Council



Ms Marie Shoemith
Senior EIA Advisor
Major Casework Directorate
The Planning Inspectorate,
Temple Quay House,
Temple Quay,
Bristol,
BS1 6PN

Anglian Water Services Ltd
Lancaster House
Lancaster Way
Ermine Business Park
Huntingdon
PE29 6XU

Tel 01480 323000
www.anglianwater.co.uk

Your ref WS010005_000008_200702

26 July 2020

Dear Ms Shoemith,

East Northamptonshire Resource Management Facility extension: EIA Scoping Report

Thank you for the opportunity to comment on the scoping report for the above project. Anglian Water is the water and sewerage undertaker for the above site. The following response is submitted on behalf of Anglian Water.

General comments

Anglian Water would welcome further discussions with Augean South Ltd prior to the submission of the Draft DCO for examination. In particular it would be helpful to discuss the following issues:

- Wording of the Draft DCO including protective provisions specifically for the benefit of Anglian Water.
- Impact of development on Anglian Water's existing assets and the need for mitigation if required.
- Pre-construction surveys.

3. Proposed Development

There is an existing water main which crosses the proposed site. With existing water mains located within the roads located on the site boundary. We would ask that the EIA report includes reference to the existing water supply infrastructure.

Maps of Anglian Water's existing assets are available to view at the following address:

<http://www.digdat.co.uk/digdatUtilities>



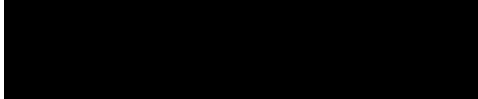
Registered Office
Anglian Water Services Ltd
Lancaster House, Lancaster Way,
Ermine Business Park, Huntingdon,
Cambridgeshire. PE29 6XU
Registered in England
No. 2366656.

an AWG Company

4.8 Flood Risk Assessment

Reference is made to a flood risk assessment being prepared for the above development. The Scoping Report identifies the principal risk of flooding from the above project being surface water flooding, Anglian Water is responsible for managing the risks of flooding from surface water, foul water or combined water sewer systems. Consideration should be given to all potential sources of flooding including sewer flooding as part of the Environmental Statement and related flood risk assessment.

Yours sincerely



Stewart Patience
Spatial Planning Manager, MRTPI

From: [REDACTED]
To: [East Northants Resource Management Facility Western Extension](#)
Cc: [REDACTED]
Subject: East Northants Resource Management Facility
Date: 30 July 2020 15:46:09
Attachments: [Proposed extension of Kings Cliffe Landfill Site Rev. 1.pdf](#)

Dear Sir/Madam

**Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017(the EIA Regulations) – Regulations 10 and 11
Application by Augean South Limited (the Applicant) for an Order granting Development Consent for the Proposed East Northants Resource Management Facility Western Extension (the Proposed Development)**

In respect of the above, I attach a copy of the letter sent by the Parish Council to Augean at the beginning of the year.

Yours faithfully

Richard Reed
Clerk to Duddington-with-Fineshade Parish Council

DUDDINGTON-WITH-FINESHADE PARISH COUNCIL

Clerk: Richard Reed, [REDACTED]
[REDACTED]
[REDACTED]

Carol Earp
Communications manager
Augean PLC
Stamford Road
Kings Cliffe
PE8 6XX

6th January 2020

Dear Ms. Earp,

Thank you for informing Duddington with Fineshade Parish Council, along with other local groups, of your proposed extension to the East Northants Resource Management Facility. Councillors and other residents were pleased to attend your Open Day on 23rd November and the matter was subsequently discussed at our meeting on 26th November.

As with all developments, the Parish Council will consider and formally comment on the proposals in line with its development policies upon receipt of a planning application. To comment at this stage may be considered to be a predetermination of any subsequent application.

Yours sincerely

[REDACTED]

Richard Reed
Clerk to Duddington-with-Fineshade Parish Council



Cedar Drive Thrapston Northamptonshire NN14 4LZ
Telephone 01832 742000
Email planning@east-northamptonshire.gov.uk
www.east-northamptonshire.gov.uk

The Planning Inspectorate
Major Casework Directorate
Temple Quay House
2 The Square
Bristol, BS1 6PN

Please ask for
Gavin Sylvester

Planning Services

Our Reference
20/00835/EXT

Your Reference
WS010005_000008_
200702

Date
30 July 2020

Dear Marie Shoesmith

TOWN AND COUNTRY PLANNING ACT 1990

Proposal: Consultation received from Planning Inspectorate asking ENC to advise it of the information it considers should be provided in an Environmental Statement (ES) relating to an Application submitted to the Planning Inspectorate by Augean South Limited for an Order granting Development Consent for the Proposed East Northants Resource Management Facility Western Extension.

Thank you for consulting East Northamptonshire Council and for providing the Augean's (the applicant) Scoping Report setting out the intended information to be included in an Environmental Statement (ES) for the project. You have asked the Council to either:

- Inform the Planning Inspectorate of the information the Council considers should be provided in the ES; or
- Confirm it has no comments to make on this matter.

The Council has no objection to the proposed Scope of the Environmental Statement and it provides the following comments from its Environmental Health Team:

Air Quality:

The Environmental Scoping Report dated July 2020 which has been submitted by the applicant details that there is currently no Air Quality Management Areas within close proximity of the site and that a traffic air quality assessment could be scoped out of the EIA, as the operations of the site will not change. This is agreed. Gaseous and particulate emissions from the landfill, waste treatment and recovery facility is to be continued to be controlled and monitored in accordance with an Environmental Permit to be sure that it remains within acceptable levels.

In accordance with the Institute of Air Quality Management document 'Guidance on the Assessment of Mineral Dust Impacts for Planning v1.1 (2016)'. A qualitative particulate dust assessment should be undertaken to ensure that it continues to remain below the annual mean of the national air quality objective.

As stated within the report there is little risk that the process contribution from the proposed development would lead to an exceedance of the annual mean air quality objective for PM10. The chemical or radiological properties of dust emissions should not be considered in the

dust assessment but in the assessment of risks to health as mentioned within the report. The Environmental Permits include measures necessary to control the emissions of dust to acceptable levels for the protection of health and amenity. The report anticipates that with the implementation of suitable operational controls the potential for significant dust impact can be minimised. Mitigation measures will be proposed as necessary to ameliorate any significant impacts identified and the residual impacts will be monitored and addressed.

Noise:

Although this will be covered by the Environmental Permit issued and monitored by the Environment Agency, the Environmental Scoping Report dated July 2020 which is submitted by the applicant details the methodology proposed for the noise impact assessment. It is proposed to use data which was collected during background noise monitoring carried out in March 2011. We have no issues with the approach detailed in the report and would refer the applicant to the attached guidance prepared by the Institute of Acoustics and Acoustic and Noise Consultants.

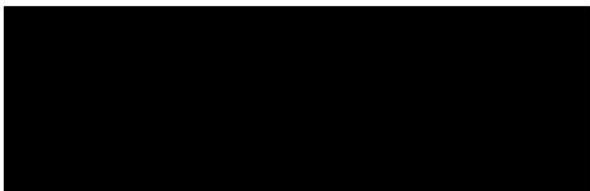
Waste:

The existing site can accept low level radioactive waste (LLW). The LLW typically comprises of construction waste from decommissioning nuclear power stations, wastes from the oil industry, manufacturing, residues from treatment and wastes from research facilities and hospitals (Section 1.7 of the EIA). The proposed LLW will be limited to waste which has a level of radioactivity of up to 200Bq/g as per the existing facility. Risk assessments for the existing facility indicate this level of radioactivity should not pose a significant risk to human health or the wider environment. However, the ES will include a further assessment of any potential risk and as such its scope is acceptable.

The management and monitoring of the existing and proposed facility will be carried out under an environmental permit issued and monitored by the Environment Agency. It is understood the operator is in the process of preparing an application to vary the existing permit in parallel with the Development Consent Order.

I trust that the above comments can be taken into consideration in providing a Scoping Opinion. Should further information be required regarding this matter please contact direct the Case Officer on Direct Line 01832 742082.

Yours faithfully



Paul Bland
Head of Planning Services



Joint Guidance on the Impact of COVID-19 on the Practicality and Reliability of Baseline Sound Level Surveying and the Provision of Sound & Noise Impact Assessments

By the Association of Noise Consultants [ANC] and the Institute of Acoustics [IOA]

Version 4

**Containing links to the guidance issued for
Scotland, Wales and Northern Ireland**

21st April 2020

Introduction

The level of concern across the United Kingdom in relation to the spread of the COVID-19 means that there is now forced home working, along with restricted travel arrangements being enforced by the Government.

With regard to the provision of Sound and Noise Impact Assessments, many Members of the ANC and IOA, are finding their normal work practices impacted, such that even where opportunities to work from home exist, it will not be 'business as usual'. Nevertheless, there will be a continuing requirement to maintain as far as possible the standard of our working practices, and also to maintain the flow of acoustic reporting which has an important role in the fabric and functioning of society. Acoustic reports are utilized for many purposes including to assist planning applications, the discharge of planning conditions and the implementation of Building Regulations. Continuing to provide high quality acoustic reporting in a timely manner for scrutiny by regulators and decision makers will allow the important aspects of planning to continue to move forward to support our society in the longer term beyond this national emergency.

As the responsible bodies, the ANC and IOA are keen to ensure that it is 'business as usual', as far as is practicably possible and responsible; not only to support continued on-going financial stability for our members, but also for the myriad strands of society that rely on our reports and input to projects. With the very tight limitations on travel for all, we recognize that there will have to be changes to the manner in which acoustic assessment and reporting is carried out. We have, therefore, recommended below some changes in working practices in the production of such reports. In so doing, it is still important to minimize uncertainties when determining baseline conditions, in a clear and transparent way. Furthermore, by good communication between those preparing the reports and those that will be reviewing them, the planning process (and other relevant processes) will be able to continue as smoothly as possible, without what could be a delay of many months.

We consider that by implementing these measures the provision of Sound and Noise Impact Assessments will be able to continue in a timely manner.

Competence

Site surveys should only take place if they can be carried out in complete accordance with current Government requirements. Instead, as set out below, alternative methods of characterising baseline conditions may be used. Acoustics professionals are skilled in understanding how best to use those techniques so that the outcome is representative and

the conclusions drawn are technically robust, so that clients and decision-makers can come to well-informed judgements.

Baseline Sound Level Characterisation

Before the most recent restrictions, the COVID-19 outbreak presented new challenges in obtaining representative baseline sound levels because typical road, air and rail transport usage have been reduced by travel restrictions and social distancing measures. Other sound sources may also have been affected – for example, due to changes in operating patterns at industrial and commercial premises. However, now that site visits cannot routinely occur, other approaches may have to be taken to establish an appropriate robust estimate of baseline conditions, such as using existing data (for example, from previous local surveys and noise maps) or undertaking baseline sound predictions. These approaches can be supplemented by additional limited on-site sound level measurements, where permitted. The most appropriate option to use must be determined on a case-by-case basis, assessing the level of uncertainty and including this information in the reporting. Most importantly at this time, before progressing with any methodology, there should be discussion of the intended approach with the relevant regulating authority.

Methodology

For some projects there will be similar challenges when determining the sound levels associated with the development. Where permitted, site visits to understand the sound environment will assist the professional in understanding the sources contributing to the sound environment, and where these may not be typical due to current circumstances. Any such site visits would need to comply with any restrictions on movement and ensure that social distancing is embedded within the site visit methodology.

For transport schemes, there will have to be a reliance on predicted sound levels to describe the baseline conditions, with a corresponding need to source flow/activity data. There are now many sources of transport data available and these should be used, where possible, along with previously made direct site measurements to describe baseline conditions. Links to data obtained from the most recent Noise Mapping carried out by the four devolved administrations and the Republic of Ireland are shown in the Appendix. Also shown are links to some road transport data sources.

Where sound from existing facilities is needed to inform future noise levels, or where it is the existing sound that is being assessed, enquiries will be needed to understand whether or not the facility is running as normal. Discussions with other operators may be needed to understand whether nearby facilities are operating normally, and whether any changes might affect sound emissions. Examples may include where the BS4142 methodology is being used to assess the impact from an industrial / commercial facility following complaints, or where existing machinery needs to be measured to use as a reference for predicted future levels.

The acoustics professional will need to consider whether alternative sources of information in respect of sound levels can reasonably be used. Where appropriate, a case should be made regarding why the proposed alternative methods are suitable for a robust assessment, and should clearly set out the estimated uncertainties in the assessment. In cases relating to the investigation of complaints it may not be possible to carry out any form of site measurement

at the moment, regardless of whether the conditions are representative of normal activities. Therefore, this type of assessment is likely to have to be postponed.

As with the determination of baseline conditions, discussions with the relevant regulators, who may be able to provide vital local knowledge, will be key.

Liaison with Regulators and Decision Makers

Liaison between acoustics professionals and relevant regulators is especially important during this period where characterising environmental sound climates cannot be undertaken in the conventional way. It is recognised that projects should be assessed on a case by case basis. A pragmatic approach may be needed with regard to the information required for planning applications and/or the discharge of planning conditions. Having said that, it will continue to be important that such assessments remain robust, and follow current good practice.

One outcome may be that supplementary information will be required at a later date or controlled by condition to allow planning authorities to maintain momentum in the planning system during this period.

Latest Government Guidance

The Chartered Institute of Ecology and Environmental Management received advice from the Government last week. Reference was made to the guidance set out here:

<https://www.gov.uk/government/publications/guidance-to-employers-and-businesses-about-covid-19/guidance-for-employers-and-businesses-on-coronavirus-covid-19>

The advice went on to state:

Ecologists and environmental professionals should therefore be able to continue with outdoor work, including ecological surveying and supervision, where they can continue to follow Public Health England guidelines.

Detailed advice for outdoor work can be found at:

<https://www.gov.uk/guidance/social-distancing-in-the-workplace-during-coronavirus-covid-19-sector-guidance#outdoor-businesses>

Work that does not require travel, such as desk-based surveys and report writing, should be completed from home where possible.

We recognise that the cessation of environmental survey works would risk causing later delays in the development sector.

Clearly, therefore, there is an acknowledgement by Government that for businesses to continue, there is a need for outdoor monitoring work to occur **as long as it can be done safely and fully complies with Government social distancing requirements**. However,

as mentioned above, if the purpose of the monitoring is to determine typical conditions, it must be remembered that current conditions are far from typical.

Guidance from the Devolved Administrations (Scotland, Wales and Northern Ireland)

In addition to the information published by the Westminster government, there is separate guidance for those working in Scotland, Wales and Northern Ireland.

This guidance is not necessarily the same.

Therefore, it is essential the reference is made to the relevant national guidance if planning a site visit in those countries.

Links to the various guidance are given below:

Scotland

<https://www.gov.scot/publications/coronavirus-covid-19-business-and-social-distancing-guidance/>

Wales

<https://gov.wales/coronavirus-covid-19-employers-and-businesses-guidance>

<https://gov.wales/taking-all-reasonable-measures-maintain-physical-distancing-workplace>

Northern Ireland

<https://www.nibusinessinfo.co.uk/content/coronavirus-workplace-safety-guidelines-and-social-distancing>

Summary

In summary, we are experiencing extremely unusual conditions but yet, it is essential that we continue to exercise our professional skills diligently and cope with these changed circumstances. Some of the advice contained in this guidance is not new, and all professionals have probably had to cope previously with unusual circumstances from time to time in their day to day life. It is just that, at the moment, every day presents an unusual situation.

It is important that decision making and associated development continue, including the planning process and the discharge of planning conditions. But it is also important to avoid poor decisions being made because the highest standard of acoustic assessment was not maintained during these challenging times.

The Association of Noise Consultants

The Institute of Acoustics

APPENDIX Noise Mapping Data

The strategic noise mapping covers the major sources of transportation noise within large urban agglomerations and along road and rail corridors between them and was designed to provide a global view of noise exposure in line with the requirements of the Environmental Noise Directive for reporting above 55 dB L_{den} and 50 dB L_{night} . It does not include all possible noise sources, or all urban areas in the UK and Ireland, however it may help to provide an initial screening for sites in the vicinity of the mapped sources.

Links have been included for downloading the results in GIS format, plus an online map viewer

England

Data: <https://www.gov.uk/government/publications/strategic-noise-mapping-2019>

Maps: <http://www.extrium.co.uk/noiseviewer.html>

Northern Ireland

Data: <https://www.opendatani.gov.uk/dataset/environmental-noise-directive-noise-mapping>

Maps: <https://apps.daira-ni.gov.uk/noisemapviewer/index.html>

Scotland

Data: <http://map.sepa.org.uk/atom/Noise.atom>
http://map.sepa.org.uk/atom/NOISE_ROUND3.atom

Maps: <https://noise.environment.gov.scot/noisemap/>

Wales

Data: <https://lle.gov.wales/catalogue/item/EnvironmentalNoiseMapping2017/?lang=en>

Maps: <http://extrium.co.uk/walesnoiseviewer.html>

Republic of Ireland

Data: <http://gis.epa.ie/GetData/Download>

Maps: <https://gis.epa.ie/EPAMaps/>

Acknowledgement: With thanks to Simon Shilton (Acustica) for supplying this information.

Transport Data Sources

Department for Transport

<https://roadtraffic.dft.gov.uk/#/6/55.254/-6.053/basemap-regions-countpoints>

Highways England

<http://webtris.highwaysengland.co.uk/>

FAO Marie Shoosmith
Major Casework Directorate
Temple Quay House
2 The Square
Bristol
BS1 6PN

Our ref: AN/2020/130630/01-L01
Your ref: WS010005_000008_200702
Date: 29 July 2020

Dear Marie

Application by Augean South Limited (The applicant) for an order granting development consent for the proposed East Northants Resource Management Facility Western Extension (The proposed development) Kings Cliffe

Thank you for consulting us on the Scoping Report for the above project, which we received on 02 July 2020.

The Environment Agency has reviewed the Scoping Report (dated July 2020) and its contents are appropriate in scope.

The applicants consultant has had some dialogue with our permitting pre application team and a pre application discussion will be held shortly to discuss the environmental setting of the site and proposed design of the extension.

The application will be parallel tracked with the environmental permit variation as noted in paragraph 1.10 of the scoping document and varied accordingly.

Please note that the view expressed in this letter is a response to a pre-application enquiry only and does not represent our final view in relation to any future planning application made in relation to this site. We reserve the right to change our position in relation to any such application.

Should you require any additional information, or wish to discuss these matters further, please do not hesitate to contact me on the number below.

Yours faithfully

Kerrie Ginns
Sustainable Places - Planning Specialist
Direct dial 02030253304
Direct e-mail kerrie.ginns@environment-agency.gov.uk

Environment Agency
Nene House (Pynchley Lodge Industrial Estate),
Pynchley Lodge Road, Kettering, Northants, NN15 6JQ
Email: LNplanning@environment-agency.gov.uk
www.gov.uk/environment-agency

*Customer services line: 03708 506 506
Weekday daytime calls to 0370 numbers cost 8p plus up to
6p per minute from BT Weekend Unlimited.
Mobile and other providers' charges may vary.*

End

23 July 2020

By EMAIL ONLY

Your Ref: WS010005_000008_200702

Major Casework
Directorate
Temple Quay House
2 The Square
Bristol, BS1 6PN

Forest Services
East and East Midlands
Santon Downham
Brandon
Suffolk IP27 0TJ

Tel 0300 067 4574

Fax 01842 813932

eandem@forestrycommission.gov.uk

Area Director: Steve Scott

Application by Augean South Limited (the Applicant) for an Order granting Development Consent for the Proposed East Northants Resource Management Facility Western Extension (the Proposed Development) Scoping consultation

Thank you for consulting the Forestry Commission on this EIA scoping document. As the Government Advisors on Forestry our main considerations are around the potential impact on the woodlands around the site and whether the scoping document includes proper assessment with regard to the Ancient Woodland.

Colleyweston Great Wood and Fineshade (The Assarts) a Plantation on Ancient Woodland Site are adjacent to the proposed development any impact from the development needs to be assessed against the guides in the Standing Advice <https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences> and the Assessment guides which can be found at the same site.

We would prefer to see a clear section in the Environmental Statement or clear references as to how impacts on the woods have been assessed. While the various methods for assessing the project may include similar assessments on dust, bats, EPS such as great crested newts it is not specific to the woods. We would suggest that a chapter is included on impacts to the ancient woodlands and any impact on ancient woodland sites is given a high impact score.

Of particular concern are:

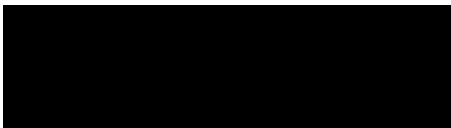
- the impact on the water availability to the woods,
- any potential contamination of the groundwater likely to be taken up by the trees,
- the impact on the existing flora and fauna of the woods including the dormice and GC Newts which are present in Fineshade.
- root damage, a significant buffer zone will be necessary.

Also included in the scoping document is the restoration and 4.3.4 states that: The net biodiversity gain which can be achieved as part of the proposals for the restoration of the site will be considered as part of the application. The DEFRA Biodiversity Metric 2.0 will be used to calculate the gains and losses at the site in order to assess the net biodiversity gain. The approach to the consideration of net biodiversity gain will be agreed with Natural England and the Local Authority and the mechanism for securing the gain will be specified.

Whilst the Forestry Commission wholeheartedly support the net biodiversity gain aim the metric is still being worked on as there were some alterations necessary related to the treatment of woodland within the metric. The Forestry Commission are currently working very closely and rapidly on the metric and finalizing agreed adjustments with Natural England on an improved method of treating woodland, which should be available by the end of this month (July), however, this won't be published until December. We therefore request that the Forestry Commission be consulted on the metric along with Natural England and that it is requested that the metric used is that internally agreed between Forestry Commission and Natural England.

We can see some very positive advantages for tree planting at this site especially if the outcome will be to join up the two woods, the larger the woodland the more resilient to climate change for all species as well as enabling greater carbon sequestration.

Yours sincerely,



Corinne Meakins
Local Partnership Advisor
Forestry Commission East and East Midlands Area Team

Please note that future consultations may also need to include Forestry England as land owners. Forestry England is the executive arm of the Forestry Commission that manages the forest estate the contact is David Chalmers, Land Agent, Central Forest District david.chalmers@forestryengland.uk

CEMHD Policy - Land Use Planning
NSIP Consultations
Building 1.2, Redgrave Court
Merton Road, Bootle
Merseyside, L20 7HS

Your ref: WS010005
Our ref: 4.2.1.6721

HSE email: NSIP.applications@hse.gov.uk

FAO Ms Marie Shoesmith
The Planning Inspectorate
Temple Quay House
Temple Quay,
Bristol
BS1 6PN

Dear Marie Shoesmith

27 July 2020

**PROPOSED EAST NORTHANTS RESOURCE MANAGEMENT FACILITY EXTENSION (the project)
PROPOSAL BY AUGEAN SOUTH LIMITED (the applicant)
INFRASTRUCTURE PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2017 (as
amended) – Regulations 10 and 11**

Thank you for your letter of 02 July 2020 regarding the information to be provided in an environmental statement relating to the above project. HSE does not comment on EIA Scoping Reports but the following information is likely to be useful to the applicant.

HSE's land use planning advice

Will the proposed development fall within any of HSE's consultation distances?

According to HSE's records there is one major accident hazard pipeline within the indicated red line boundary for this nationally significant infrastructure project; as illustrated in figure 4 'The application boundary, the services at and in the vicinity of the western extension and the public rights of way in the vicinity of ENRMF', as part of the document reference AU/KCW/LZH/1724/01/SCF: July 2020.

Major accident hazard pipelines:

- 1) HSE ref 6909, operated by National Grid PLC; 2 Feeder A47(T) / Duddington

HSE's Land Use Planning advice would be dependent on the location of areas where people may be present. When we are consulted by the Applicant with further information under Section 42 of the Planning Act 2008, we can provide full advice.

Hazardous Substance Consent

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.

Further information on HSC should be sought from the relevant Hazardous Substances Authority.

Consideration of risk assessments

Regulation 5(4) of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 requires the assessment of significant effects to include, where relevant, the expected significant effects arising from the proposed development's vulnerability to major accidents. HSE's role on NSIPs is summarised in the following Advice Note 11 Annex on the Planning Inspectorate's website - [Annex G – The Health and Safety Executive](#) . This document includes consideration of risk assessments on page 3.

Explosives sites

HSE has no comment to make, as there are no licensed explosives sites in the area.

Electrical Safety

No comment, from a planning perspective.

During lockdown, please send any further communication on this project directly to the HSE's designated e-mail account for NSIP applications at nsip.applications@hse.gov.uk. We are currently unable to accept hard copies, as our offices are closed.

Yours sincerely,



Dave Adams
CEMHD4 Policy

Our ref:

Your ref: WS010005_000008_200702

Marie Shoesmith
The Planning Inspectorate
Temple Quay House
Temple Quay
Bristol
BS1 6PN

Martin Seldon
Highways England
The Cube
199 Wharfside Street
Birmingham
B1 1RN

Direct Line: 0300 470 3345

17 July 2020

Dear Marie,

Application by Augean South Limited for an Order Granting Development Consent for the proposed East Northants Resource Management Facility Western Extension - Scoping consultation

Thank you for inviting Highways England to provide comments on the scoping opinion for the proposed East Northants Resource Management Facility (ENRMF) western extension, located at the existing ENRMF, Stamford Road, Kings Cliffe, Northamptonshire, PE8 6XX.

Under the Planning Act 2008 (as amended) and the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009, Highways England is a statutory consultee on applications for Development Consent Orders likely to affect roads for which the Secretary of State for Transport is the highway authority. Highways England seeks to engage with communities and the development industry to deliver sustainable development and thus economic growth, whilst safeguarding the primary function and purpose of the Strategic Road Network (SRN).

We note that the applicant aims to use the currently submitted scoping report as a base for preparing the Environmental Impact Assessment (EIA) and Environmental Statement which will accompany the forthcoming Development Consent Order (DCO) application for this development proposal.

Based on our initial review of the information included within the EIA Scoping Report submitted by the applicant, we have the following comments:

Transport and Traffic

We note that Section 4.9 briefly states that there will be a likely increase in HGV traffic movements as a result of the proposed development. However, we would require the applicant to quantify the anticipated HGV movements from the proposed development to assess the likely traffic impact on the SRN in the area. It is also stated in the scoping

report that a worst-case scenario would be considered for the transport assessment and we welcome this.

We acknowledge that the applicant is having ongoing discussions with Northamptonshire County Council and we would welcome being invited to these discussions so that the Transport Assessment (TA) can be reviewed and agreed by Highways England prior to the applicant submitting the draft DCO.

In addition to the above, the areas of concern that Highways England would wish to see considered as part of an EIA are set out below. The comments relate specifically to matters arising from Highways England's responsibilities to manage and maintain the SRN in England. Comments relating to the local road network should be sought from the appropriate Local Highway Authority (LHA).

General aspects to be addressed in all cases include:

- An assessment of transport related impacts of the proposal should be carried out and reported as described in the Department for Transport (DfT) 'Guidance on Transport Assessment (GTA)' and in accordance with Circular 02/2013. It is noted that this guidance has been archived, however it still provides a good practice guide in preparing a Transport Assessment (TA). In addition, the Ministry of Housing, Communities and Local Government also provide guidance on preparing TAs.
- Environmental impact arising from any disruption during construction, traffic volume, composition or routing change and transport infrastructure modification should be fully assessed and reported.
- Adverse change to noise and air quality should be particularly considered, including in relation to compliance with the European air quality limit values and/or in local authority designated Air Quality Management Areas (AQMAs).

Highways England recommends the following site-specific considerations should inform the TA proposed to be submitted as part of the EIA:

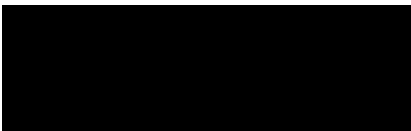
- *Impacts on the SRN in the area:* We note that the nearest point of impact of development traffic on the SRN will be the A1 in the area, which is located approximately 7km to the east of the development site. Highways England is keen to understand the likely trip impacts of the proposed development on the A1 junctions in the area, specifically the A1/A47 dumbbell roundabout and the A1/A43 junction. As such, the applicant will be required to provide this information in the TA that will be submitted in support of the application. Please note that the TA should be carried out in accordance with the advice provided in DfT's Circular 02/2013 'Strategic road network and the delivery of sustainable development'.
- *Junction Capacity Assessments:* It is advised that any junction capacity assessments that are required for the SRN must be carried out for the following scenarios in line with DfT's Circular 02/2013:
 - Opening Year (the year in which the development is expected to be opened)
Reference Case Scenario: This scenario should include all the committed developments in the vicinity of the development site based on their likely build out by the opening year in line with Circular 02/2013.

- Opening Year With Development Scenario – Opening Year Reference Case Scenario + Proposed development. This scenario will determine whether any mitigation is required for the SRN.
- The impact of the development should also be assessed for 10 years after the year the application is registered or the plan end period (whichever is greater). This is for information so that Highways England can inform their programme of works for the future.
- In addition, we recommend you liaise with relevant local planning authorities to determine the consented developments and their likely build out by opening year which will need to be incorporated in the assessment.
- Consideration should also be given to sustainable transport and travel options to and from the site and should be included within the TA as appropriate.

We also recommend that the TA is agreed in a staged approach, that is the overall methodology and elements such as trip generation and distribution, traffic growth rates, etc. be agreed prior to further assessment work being carried out. This approach should avoid any abortive work.

These comments imply no pre-determined view as to the acceptability of the proposed development in traffic, environmental or highway terms. Should the applicant wish to discuss the merits of the proposal in terms of the likely impact on the SRN please contact me on 0300 470 3345 or Martin.Seldon@highwaysengland.co.uk

Yours sincerely,



Martin Seldon
Assistant Spatial Planner
Email: Martin.Seldon@highwaysengland.co.uk



Historic England

Ms Marie Shoemith
The Planning Inspectorate
Major Caswork Directorate
Temple Quay House
2 The Square
Bristol
BS1 6PN

Direct Dial: 01216256856

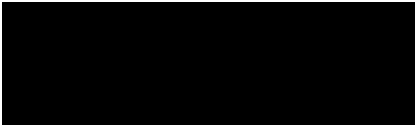
Our ref: PL00705224

29 July 2020

Dear Ms Shoemith

Thank you for your consultation letter (your reference WS010005_000008_200702) of the 2 July 2020 seeking Historic England's advice regarding the scoping of information that should be provided in the Environmental Statement for the proposed west extension to the East Northants Resource Management Facility. We have reviewed the report prepared by the applicant and are content with the scope of assessment that will be made for cultural heritage and with the indicated engagement with the specialist archaeological advisers at Northamptonshire County Council.

We do not need to be involved further with this case, however please do contact us if you feel you need further advice from Historic England to assist your determination.



Neil Rimmington
Inspector of Ancient Monuments
neil.rimmington@HistoricEngland.org.uk

cc: Lesley-Ann Mather - Northamptonshire County Council



THE AXIS 10 HOLLIDAY STREET BIRMINGHAM B1 1TF

Telephone 0121 625 6888
HistoricEngland.org.uk



Historic England is subject to both the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any Information held by the organisation can be requested for release under this legislation.

From: [REDACTED]
To: [East Northants Resource Management Facility Western Extension](#)
Subject: Leicestershire County Council Planning Consultation Response - Application by Augean South Limited (the Applicant) for an Order granting Development Consent for the Proposed East Northants Resource Management Facility Western Extension (the Proposed Devel
Date: 24 July 2020 15:05:51
Attachments: [20200702_recd_consultation.pdf](#)
[20200720_recd_landscape.doc](#)

Dear Sir/Madam,

Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017(the EIA Regulations) – Regulations 10 and 11

Application by Augean South Limited (the Applicant) for an Order granting Development Consent for the Proposed East Northants Resource Management Facility Western Extension (the Proposed Development)

Scoping consultation and notification of the Applicant's contact details and duty to make available information to the Applicant if requested

Thank you for consulting Leicestershire County Council Planning on the attached request. We have undertaken consultation with our internal consultees and can provide you with the attached comments from our Landscape Advisor for your consideration and inclusion within the Scoping Opinion. I can confirm we have no comments from an archaeological, heritage, minerals, waste, highways or ecological perspective.

Kind Regards,

Amelia Mistry
Planning Officer,
Planning, Historic and Natural Environment,
Chief Executive's Department
Leicestershire County Council
County Hall
Glenfield
LE3 8RA

[REDACTED]
[REDACTED]

You'll no doubt be aware that the coronavirus pandemic is affecting all public services.

At Leicestershire County Council, we're currently working hard to maintain our critical services. Because of this we're having to prioritise all our work and you may not get a reply as quick as usual.

We're really sorry for any delay - and we hope to reply as soon as we can. Thank you for your support and understanding.

For the latest updates visit: www.leicestershire.gov.uk/coronavirus-covid-19

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Request for a formal scoping opinion

Augean South Limited - SCOPING REQUEST – For an order granting Development Consent for the Proposed East Northants Resource Management Facility Western Extension. PINS project reference: WS0 10005

This scoping Opinion has been prepared with reference to the recommendations provided within “Environmental Impact Assessment (EIA) - A handbook for scoping projects”, (Environment Agency 2002). I have also studied the Planning Inspectorate’s Advice Note 7: Environmental Impact Assessment: Preliminary Environmental Information, Screening and Scoping’.

Having carried out an assessment of the *EIA SCOPING REPORT, Reference AU/KCW/LZH/1724/01/SCF, dated July 2020*, as well as a desk top study, site and scheme familiarisation, I would like to make the following comments relating to the landscape and visual assessment:

1.0 Guidance and Best Practice.

1.1 I am pleased to see that the Landscape and Visual Impact Assessment will be prepared in accordance with the Landscape Institute’s “Guidelines for Landscape and Visual Impact Assessment, third edition (GLVIA3) 2013” which is the industry standard work on LVIA giving detailed advice on the process of assessing the landscape and visual effects of developments and their significance.

2.0 Definition and mapping of the Zone of Theoretical Visibility (ZTV)/ Visual Receptors.

2.1 I would recommend that the Applicant demonstrates that all visual receptors as well as other potentially significant locations have been considered (including Public Rights of Ways, roads and farms). In accordance with the guidelines set out in GLVIA3, I would want to see a plan showing the ZTV and all individual residential properties, PROWs and roads within the ZTV identified, named and recorded with the level of visual impact attributed.

2.2 I would also recommend that seasonal variations are taken into consideration and submitted by the Applicant as part of the Environmental Statement

3.0 Methods.

3.1 I would recommend that the Applicant includes an outline of the methods used to predict impacts and the significance criteria framework used (see 1.0 Guidance and Best Practice, above) as part of the Environmental Statement.

4.0 Mitigation.

- 4.1 The proposed restoration landform options are illustrated in *Drawing Nos Figure 6A and 6B*. I would also want to see details of the proposed mitigation and predicted residual impacts, particularly details of proposed screen planting and additional planting, bunding, including slope profiles/ sections and screening, submitted as part of the Environmental Statement. In addition, I would recommend clarification on which vegetation including hedgerows and trees are to be retained and information on how existing vegetation will be protected during the works.

5.0 Site Selection.

- 5.1 I am pleased to see that assessment of alternative sites will be covered in the Environmental Statement.

6.0 Cumulative Development.

- 6.1 I am pleased to see that cumulative development has been taken into consideration and will be suitably assessed within the Environmental Statement.

Wendy Crawford BSc Dip LA CMLI

17/07/20



Ministry of Defence

The Planning Inspectorate
3/18 Eagle Wing,
Temple Quay House,
Temple

Your reference: **WS010005**
Our reference: 10048592

Dear Sir/Madam,

MOD Safeguarding - RAF Wittering

Proposal: East Northants Resource Management Facility Extension - EIA Regulation 10 and 11 Scoping Notification and Consultation

Location: approximately 1.1km east south east of Duddington village and approximately 2km north west of Kings Cliffe village

Grid Ref: 499653, 299160

Thank you for consulting the Ministry of Defence (MOD) on the above proposed development which was received by this office on 02/07/20.

This is a scoping opinion for a proposed extension to an existing hazardous waste landfill site located approximately 2.6km south west from the end of the 07 runway at RAF Wittering.

Birdstrike safeguarding zone

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.

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.

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.

The stripping and handling of top soils can expose invertebrates, resulting in feeding opportunities for hazardous birds such as corvids and gulls. As such, at any development near an aerodrome which

Defence Infrastructure Organisation

Safeguarding Department
Statutory & Offshore

Defence Infrastructure Organisation
Kingston Road
Sutton Coldfield
West Midlands
B75 7RL

Tel: 07929350658

E-mail: DIO-safeguarding-statutory@mod.gov.uk

www.mod.uk/DIO

30 July 2020

involves earthworks a Bird Hazard Management Plan (BHMP) is recommended to ensure that the handling of top soil does not result in a transitory attractant for hazardous birds.

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.

To address the issue of increased birdstrike risk, DIO Safeguarding request a condition to be included as part of any permission granted for this application as follows:

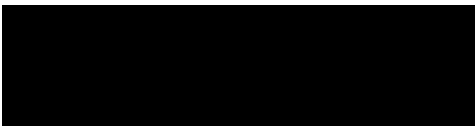
- No putrescible wastes are accepted or handled on site in line with the currently permitted wastes due to the potential for such waste to provide an exploitable food resource for hazardous birds such as gulls and Red Kites.
- A Bird Hazard Management Plan is submitted to compact, cover or remove any 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.

In summary, subject to the above design requirements being implemented as part of any planning permission granted, the MOD maintains no safeguarding objection to this application.

I would be grateful if you could confirm receipt of this letter confirming the above design requirements are taken into consideration at this stage of the application process.

I trust this is clear however should you have any questions please do not hesitate to contact me.

Yours sincerely



Jacqueline Blanchard

Assistant Safeguarding Manager

From: [Holdsworth, Anne](#)
To: [East Northants Resource Management Facility Western Extension](#)
Subject: APPLICATION BY AUGEAN SOUTH LIMITED FOR THE PROPOSED EAST NORTHANTS RESOURCE MANAGEMENT FACILITY WESTERN EXTENSION
Date: 15 July 2020 10:33:27
Attachments: [NG Scoping Response East Northants Facility Extension July 2020.pdf](#)
[East Northants Asset Plan.pdf](#)

Good morning

Further to your letter dated 2nd July 2020 in relation to the above proposed application please find attached a response on behalf of National Grid Electricity Transmission PLC and National Grid Gas PLC.

If you require any further information please do not hesitate to contact me.

Kind regards

Anne

Anne Holdsworth

DCO Liaison Officer
Land and Acquisitions, Land and Property
nationalgrid

+44 (0)7960 175682
anne.holdsworth@nationalgrid.com

National Grid House, (Floor C2), Warwick Technology Park, Gallows Hill, Warwick,
CV34 6DA
nationalgrid.com | [Twitter](#) | [LinkedIn](#)

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Please consider the environment before printing this email.

Advance notice of holiday: 20th – 25th July inclusive

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For the registered information on the UK operating companies within the National Grid group please use the attached link: <https://www.nationalgrid.com/group/about-us/corporate-registrations>

Anne Holdsworth
DCO Liaison Officer
Land & Business Support

Anne.Holdsworth@nationalgrid.com

Tel: +44 (0)7960 175682

www.nationalgrid.com

SUBMITTED ELECTRONICALLY:
ENRMFextension@planninginspectorate.gov.uk

15 July 2020

Dear Sir/Madam

APPLICATION BY AUGEAN SOUTH LIMITED (THE APPLICANT) FOR AN ORDER GRANTING DEVELOPMENT CONSENT FOR THE PROPOSED EAST NORTHANTS RESOURCE MANAGEMENT FACILITY WESTERN EXTENSION (THE PROPOSED DEVELOPMENT) SCOPING CONSULTATION

This is a response on behalf of National Grid Electricity Transmission PLC (NGET) and National Grid Gas PLC (NGG).

I refer to your letter dated 2nd July 2020 in relation to the above proposed application. Having reviewed the scoping report, I would like to make the following comments:

National Grid infrastructure within / in close proximity to the order boundary

Electricity Transmission

National Grid Electricity Transmission has no apparatus within or in close proximity to the proposed order limits.

Gas Transmission Infrastructure:

National Grid Gas has a high pressure gas transmission pipeline 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:

- Feeder Main 2 Helpston to Duddington.

I enclose a plan showing the route of the National Grid Gas transmission pipeline and associated gas apparatus.

Gas Infrastructure

The following points should be taken into consideration:

- 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.

Pipeline Crossings:

- 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.
- 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

Cable Crossings:

- Cables may cross the pipeline at perpendicular angle to the pipeline i.e. 90 degrees.
- A National Grid representative shall supervise any cable crossing of a pipeline.
- Clearance must be at least 600mm above or below the pipeline.
- Impact protection slab should be laid between the cable and pipeline if cable crossing is above the pipeline.
- A Deed of Consent is required for any cable crossing the easement.

- Where a new service is to cross over the pipeline a clearance distance of 0.6 metres between the crown of the pipeline and underside of the service should be maintained. If this cannot be achieved the service shall cross below the pipeline with a clearance distance of 0.6 metres.

General Notes on Pipeline Safety:

- You should be aware of the Health and Safety Executives guidance document HS(G) 47 "Avoiding Danger from Underground Services", and National Grid's specification for Safe Working in the Vicinity of National Grid High Pressure gas pipelines and associated installations - requirements for third parties T/SP/SSW22.
- National Grid will also need to ensure that our pipelines access is maintained during and after construction.
- 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.
- If any excavations are planned within 3 metres of National Grid High Pressure Pipeline or, within 10 metres of an AGI (Above Ground Installation), 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.
- 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.

To view the SSW22 Document, please use the link below:

<http://www.nationalgrid.com/uk/LandandDevelopment/DDC/GasElectricNW/safeworking.htm>

To download a copy of the HSE Guidance HS(G)47, please use the following link:

<http://www.hse.gov.uk/pubns/books/hsg47.htm>

Further Advice

We would request that the potential impact of the proposed scheme on National Grid's existing assets as set out above and including any proposed diversions is considered in any subsequent reports, including in the Environmental Statement, and as part of any subsequent application.

Where any diversion of apparatus may be required to facilitate a scheme, National Grid is unable to give any certainty with the regard to diversions until such time as adequate conceptual design studies have been undertaken by National Grid. Further information relating to this can be obtained by contacting the email address below.

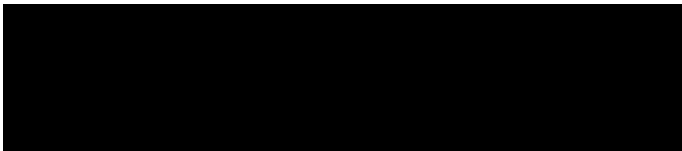
Where the promoter intends to acquire land, extinguish rights, or interfere with any of National Grid apparatus, protective provisions will be required in a form acceptable to it to be included within the DCO.

National Grid requests to be consulted at the earliest stages to ensure that the most appropriate protective provisions are included within the DCO application to safeguard the integrity of our apparatus and to remove the requirement for objection. All consultations should be sent to the following email address: box.landandacquisitions@nationalgrid.com

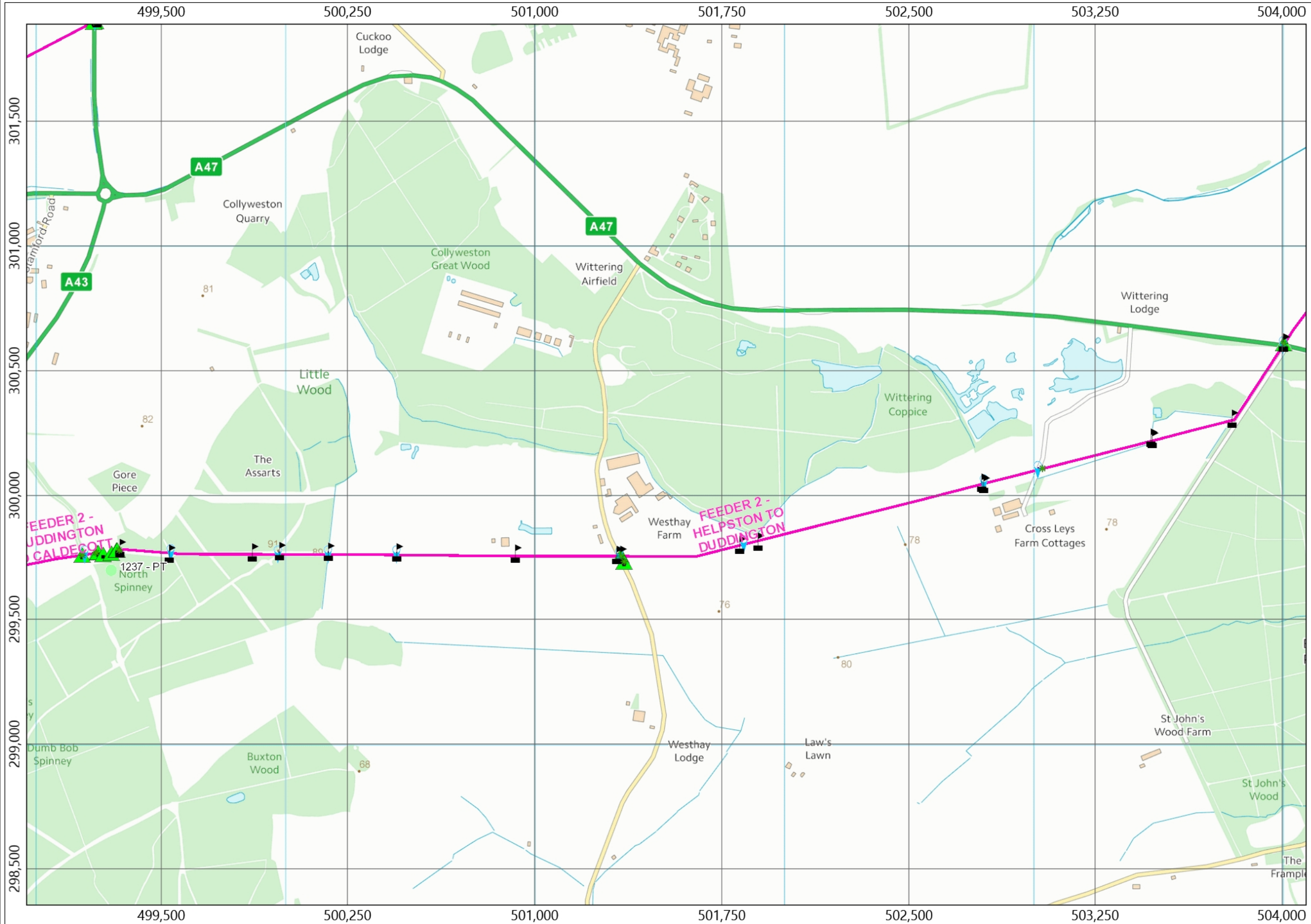
I hope the above information is useful. If you require any further information please do not hesitate to contact me.

The information in this letter is provided notwithstanding any discussions taking place in relation to connections with electricity or gas customer services.

Yours faithfully



Anne Holdsworth
DCO Liaison Officer, Land and Acquisitions



Legend:

- Substations Commissioned
- Commissioned Circuits
- Decommissioned Group
- Planned and Spares
- OHL 400kV Commissioned
- OHL 275kV Commissioned
- OHL 132kV & Below Commissioned
- Towers Commissioned
- Buried Cable Commissioned
- Fibre Cable Commissioned
- Pilot Cable
- Oil Pipe
- Cooling Pipe
- Cooling Station
- RAMM
- Cable Tunnel
- Gas Operational Boundary
- Gas Site Boundary
- Trial Hole
- Vantage Point
- ▲ Aerial Marker Post
- ▲ Pipe Crossing Point
- ▲ CP Test Post
- ▲ Transformer Rectifier
- Pipeline Crossing Sleeve
- Nitrogen Sleeve
- Other Sleeves
- Pipe Line Control Point
- Named Pipeline Section
- ▲ River Crossings

Notes:
East Northants Asset Plan



Date: 28 July 2020
Our ref: 321248
Your ref: WS010005



Marie Shoosmith
The Planning Inspectorate

BY EMAIL ONLY

Customer Services
Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

T 0300 060 3900

Dear Ms Shoosmith

Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017(the EIA Regulations) – Regulations 10 and 11

Application by Augean South Limited (the Applicant) for an Order granting Development Consent for the Proposed East Northants Resource Management Facility Western Extension (the Proposed Development)

Thank you for seeking our advice on the scope of the Environmental Statement (ES) in your consultation dated 02 July 2020 which we received on 02 July 2020.

Natural England is in liaison with Augean South Ltd through the Discretionary Advice Service (Consultation number 313659) regarding the scope of surveys required, potential mitigation measures, and restoration. .

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Case law¹ and guidance² has stressed the need for a full set of environmental information to be available for consideration prior to a decision being taken on whether or not to grant planning permission. Annex A to this letter provides Natural England's advice on the scope of the Environmental Impact Assessment (EIA) for this development.

Should the proposal be amended in a way which significantly affects its impact on the natural environment then, in accordance with Section 4 of the Natural Environment and Rural Communities Act 2006, Natural England should be consulted again.

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us. For any queries relating to the specific advice in this letter only please contact Joanna Gamble on 07392129911. For any new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.

Yours sincerely
Camilla Davidge
Lead Advisor – Land Use Planning
West Anglia Area Team

¹ Harrison, J in *R. v. Cornwall County Council ex parte Hardy* (2001)

² *Note on Environmental Impact Assessment Directive for Local Planning Authorities* Office of the Deputy Prime Minister (April 2004) available from <http://webarchive.nationalarchives.gov.uk/+http://www.communities.gov.uk/planningandbuilding/planning/sustainability/environmental/environmentalimpactassessment/noteenvironmental/>

Annex A – Advice related to EIA Scoping Requirements

1. General Principles

Schedule 4 of the Town & Country Planning (Environmental Impact Assessment) Regulations 2017, sets out the necessary information to assess impacts on the natural environment to be included in an ES, specifically:

- A description of the development – including physical characteristics and the full land use requirements of the site during construction and operational phases.
- Expected residues and emissions (water, air and soil pollution, noise, vibration, light, heat, radiation, etc.) resulting from the operation of the proposed development.
- An assessment of alternatives and clear reasoning as to why the preferred option has been chosen.
- A description of the aspects of the environment likely to be significantly affected by the development, including, in particular, population, fauna, flora, soil, water, air, climatic factors, material assets, including the architectural and archaeological heritage, landscape and the interrelationship between the above factors.
- A description of the likely significant effects of the development on the environment – this should cover direct effects but also any indirect, secondary, cumulative, short, medium and long term, permanent and temporary, positive and negative effects. Effects should relate to the existence of the development, the use of natural resources and the emissions from pollutants. This should also include a description of the forecasting methods to predict the likely effects on the environment.
- A description of the measures envisaged to prevent, reduce and where possible offset any significant adverse effects on the environment.
- A non-technical summary of the information.
- An indication of any difficulties (technical deficiencies or lack of know-how) encountered by the applicant in compiling the required information.

It will be important for any assessment to consider the potential cumulative effects of this proposal, including all supporting infrastructure, with other similar proposals and a thorough assessment of the 'in combination' effects of the proposed development with any existing developments and current applications. A full consideration of the implications of the whole scheme should be included in the ES. All supporting infrastructure should be included within the assessment.

2. Biodiversity and Geology

2.1 Ecological Aspects of an Environmental Statement

Natural England advises that the potential impact of the proposal upon features of nature conservation interest and opportunities for habitat creation/enhancement should be included within this assessment in accordance with appropriate guidance on such matters. Guidelines for Ecological Impact Assessment (EclA) have been developed by the Chartered Institute of Ecology and Environmental Management (CIEEM) and are available on their website.

EclA is the process of identifying, quantifying and evaluating the potential impacts of defined actions on ecosystems or their components. EclA may be carried out as part of the EIA process or to support other forms of environmental assessment or appraisal.

The National Planning Policy Framework sets out guidance in S.174-177 on how to take account of biodiversity interests in planning decisions and the framework that local authorities should provide to assist developers.

2.2 Internationally and Nationally Designated Sites

The ES should thoroughly assess the potential for the proposal to affect designated sites. European sites (e.g. designated Special Areas of Conservation and Special Protection Areas) fall within the scope of the Conservation of Habitats and Species Regulations 2017 (as amended). In addition paragraph 176 of the National Planning Policy Framework requires that potential Special Protection Areas, possible Special Areas of Conservation, listed or proposed Ramsar sites, and any

site identified as being necessary to compensate for adverse impacts on classified, potential or possible SPAs, SACs and Ramsar sites be treated in the same way as classified sites. Under Regulation 63 of the Conservation of Habitats and Species Regulations 2017 (as amended) an appropriate assessment needs to be undertaken in respect of any plan or project which is (a) likely to have a significant effect on a European site (either alone or in combination with other plans or projects) and (b) not directly connected with or necessary to the management of the site.

Should a Likely Significant Effect on a European/Internationally designated site be identified or be uncertain, the competent authority (in this case the Local Planning Authority) may need to prepare an Appropriate Assessment, in addition to consideration of impacts through the EIA process.

Sites of Special Scientific Interest (SSSIs) and sites of European or international importance (Special Areas of Conservation, Special Protection Areas and Ramsar sites)

The development site is adjacent to/has the potential to affect the following designated nature conservation site:

- Collyweston Great Wood and Easton Hornstocks SSSI and National Nature Reserve (Adjacent to the application site)
- Bedford Purlieus SSSI and National Nature Reserve
- Bonemills Hollow SSSI

Further information on the SSSI and its special interest features can be found at www.magic.gov. The Environmental Statement should include a full assessment of the direct and indirect effects of the development on the features of special interest within these sites and should identify such mitigation measures as may be required in order to avoid, minimise or reduce any adverse significant effects.

2.3 Regionally and Locally Important Sites

The EIA will need to consider any impacts upon local wildlife and geological sites. Local Sites are identified by the local wildlife trust, geoconservation group or a local forum established for the purposes of identifying and selecting local sites. They are of county importance for wildlife or geodiversity. The Environmental Statement should therefore include an assessment of the likely impacts on the wildlife and geodiversity interests of such sites. The assessment should include proposals for mitigation of any impacts and if appropriate, compensation measures. Contact the local wildlife trust, geoconservation group or local sites body in this area for further information.

The application site is immediately adjacent to Finshades wood which is an area containing high quality habitat and species. Therefore we recommend that this is taken into consideration, (both through construction and restoration phases) within the ES.

2.4 Protected Species - Species protected by the Wildlife and Countryside Act 1981 (as amended) and by the Conservation of Habitats and Species Regulations 2017 (as amended)

The ES should assess the impact of all phases of the proposal on protected species (including, for example, great crested newts, reptiles, birds, water voles, badgers and bats). Natural England does not hold comprehensive information regarding the locations of species protected by law, but advises on the procedures and legislation relevant to such species. Records of protected species should be sought from appropriate local biological record centres, nature conservation organisations, groups and individuals; and consideration should be given to the wider context of the site for example in terms of habitat linkages and protected species populations in the wider area, to assist in the impact assessment.

The conservation of species protected by law is explained in Part IV and Annex A of Government Circular 06/2005 *Biodiversity and Geological Conservation: Statutory Obligations and their Impact within the Planning System*. The area likely to be affected by the proposal should be thoroughly surveyed by competent ecologists at appropriate times of year for relevant species and the survey

results, impact assessments and appropriate accompanying mitigation strategies included as part of the ES.

In order to provide this information there may be a requirement for a survey at a particular time of year. Surveys should always be carried out in optimal survey time periods and to current guidance by suitably qualified and where necessary, licensed, consultants. Natural England has adopted [standing advice](#) for protected species which includes links to guidance on survey and mitigation.

2.5 Habitats and Species of Principal Importance

The ES should thoroughly assess the impact of the proposals on habitats and/or species listed as 'Habitats and Species of Principal Importance' within the England Biodiversity List, published under the requirements of S41 of the Natural Environment and Rural Communities (NERC) Act 2006. Section 40 of the NERC Act 2006 places a general duty on all public authorities, including local planning authorities, to conserve and enhance biodiversity. Further information on this duty is available here <https://www.gov.uk/guidance/biodiversity-duty-public-authority-duty-to-have-regard-to-conserving-biodiversity>.

Government Circular 06/2005 states that Biodiversity Action Plan (BAP) species and habitats, 'are capable of being a material consideration...in the making of planning decisions'. Natural England therefore advises that survey, impact assessment and mitigation proposals for Habitats and Species of Principal Importance should be included in the ES. Consideration should also be given to those species and habitats included in the relevant Local BAP.

Natural England advises that a habitat survey (equivalent to Phase 2) is carried out on the site, in order to identify any important habitats present. In addition, ornithological, botanical and invertebrate surveys should be carried out at appropriate times in the year, to establish whether any scarce or priority species are present. The Environmental Statement should include details of:

- Any historical data for the site affected by the proposal (e.g. from previous surveys);
- Additional surveys carried out as part of this proposal;
- The habitats and species present;
- The status of these habitats and species (e.g. whether priority species or habitat);
- The direct and indirect effects of the development upon those habitats and species;
- Full details of any mitigation or compensation that might be required.

The development should seek if possible to avoid adverse impact on sensitive areas for wildlife within the site, and if possible provide opportunities for overall wildlife gain.

The record centre for the relevant Local Authorities should be able to provide the relevant information on the location and type of priority habitat for the area under consideration.

2.6 Contacts for Local Records

Natural England does not hold local information on local sites, local landscape character and local or national biodiversity priority habitats and species. We recommend that you seek further information from the appropriate bodies (which may include the local records centre, the local wildlife trust, local geoconservation group or other recording society and a local landscape characterisation document).

Northamptonshire Biodiversity Records Centre (NBRC) supports the recording, curation and sharing of quality verified environmental information for sound decision-making. For further information and to request a data search please contact NBRC via their website: <https://northantsbrc.org.uk/>

3. Designated Landscapes and Landscape Character

Landscape and visual impacts

Natural England would wish to see details of local landscape character areas mapped at a scale appropriate to the development site as well as any relevant management plans or strategies

pertaining to the area. The EIA should include assessments of visual effects on the surrounding area and landscape together with any physical effects of the development, such as changes in topography.

The EIA should include a full assessment of the potential impacts of the development on local landscape character using [landscape assessment methodologies](#). We encourage the use of Landscape Character Assessment (LCA), based on the good practice guidelines produced jointly by the Landscape Institute and Institute of Environmental Assessment in 2013. LCA provides a sound basis for guiding, informing and understanding the ability of any location to accommodate change and to make positive proposals for conserving, enhancing or regenerating character, as detailed proposals are developed.

Natural England supports the publication *Guidelines for Landscape and Visual Impact Assessment*, produced by the Landscape Institute and the Institute of Environmental Assessment and Management in 2013 (3rd edition). The methodology set out is almost universally used for landscape and visual impact assessment.

In order to foster high quality development that respects, maintains, or enhances, local landscape character and distinctiveness, Natural England encourages all new development to consider the character and distinctiveness of the area, with the siting and design of the proposed development reflecting local design characteristics and, wherever possible, using local materials. The Environmental Impact Assessment process should detail the measures to be taken to ensure the building design will be of a high standard, as well as detail of layout alternatives together with justification of the selected option in terms of landscape impact and benefit.

The assessment should also include the cumulative effect of the development with other relevant existing or proposed developments in the area. In this context Natural England advises that the cumulative impact assessment should include other proposals currently at Scoping stage. Due to the overlapping timescale of their progress through the planning system, cumulative impact of the proposed development with those proposals currently at Scoping stage would be likely to be a material consideration at the time of determination of the planning application.

The assessment should refer to the relevant [National Character Areas](#) which can be found on our website. Links for Landscape Character Assessment at a local level are also available on the same page.

Heritage Landscapes

You should consider whether there is land in the area affected by the development which qualifies for conditional exemption from capital taxes on the grounds of outstanding scenic, scientific or historic interest. An up-to-date list may be obtained at www.hmrc.gov.uk/heritage/lbsearch.htm.

4. Access and Recreation

Natural England encourages any proposal to incorporate measures to help encourage people to access the countryside for quiet enjoyment. Measures such as reinstating existing footpaths together with the creation of new footpaths and bridleways are to be encouraged. Links to other green networks and, where appropriate, urban fringe areas should also be explored to help promote the creation of wider green infrastructure. Relevant aspects of local authority green infrastructure strategies should be incorporated where appropriate.

Rights of Way, Access land, and National Trails

The EIA should consider potential impacts on access land, public open land, rights of way and coastal access routes in the vicinity of the development. The National Trails website www.nationaltrail.co.uk provides information including contact details for the National Trail Officer. Appropriate mitigation measures should be incorporated for any adverse impacts. We also recommend reference to the relevant Right of Way Improvement Plans (ROWIP) to identify public rights of way within or adjacent to the proposed site that should be maintained or enhanced.

5. Soil and Agricultural Land Quality

Impacts from the development should be considered in light of the Government's policy for the protection of the best and most versatile (BMV) agricultural land as set out in paragraph 170 of the NPPF. We also recommend that soils should be considered in the context of the sustainable use of land and the ecosystem services they provide as a natural resource, as also highlighted in paragraph 170 of the NPPF.

Soils, Land Quality and Reclamation

Soil is a finite resource that fulfils many important functions and services (ecosystem services) for society, for example as a growing medium for food, timber and other crops, as a store for carbon and water, as a reservoir of biodiversity and as a buffer against pollution. It is therefore important that the soil resources are protected and used sustainably.

The following issues should therefore be considered in detail as part of the Environmental Statement:

- The degree to which soils would be disturbed/harmed as part of this development and whether any 'best and most versatile' agricultural land would be affected.

If required, an agricultural land classification and soil survey of the land should be undertaken, normally at a detailed level (eg one auger boring per hectare supported by pits dug in each main soil type), to confirm the soil physical characteristics of the full depth of soil resource ie 1.2 metres.

For further information on the availability of existing agricultural land classification (ALC) information see www.magic.gov.uk . Natural England Technical Information Note 049 - [Agricultural Land Classification: protecting the best and most versatile agricultural land](#) also contains useful explanatory information.

- Proposals for handling different types of topsoil and subsoil and the storage of soils and their management whilst in store.

Reference could usefully be made to [MAFF's Good Practice Guide for Handling Soils](#) which comprises separate sections, describing the typical choice of machinery and method of their use for handling soils at various phases. The techniques described by Sheets 1-4 are recommended for the successful reinstatement of higher quality soils.

- The method of assessing whether soils are in a suitably dry condition to be handled (ie dry and friable), and the avoidance of soil handling, trafficking and cultivation during the wetter winter period.
- A description of the proposed depths and soil types of the restored soil profiles; normally to an overall depth of 1.2 m over an evenly graded overburden layer (or, in the case of waste reclamation, an evenly graded capping layer).
- The effects on land drainage, agricultural access and water supplies, including other agricultural land in the vicinity.
- The impacts of the development on farm structure and viability, and on other established rural land use and interests, both during the site working period and following its reclamation.
- A detailed Restoration Plan illustrating the restored landform and the proposed afteruses, together with details of surface features, water bodies and the availability of outfalls to accommodate future drainage requirements.

- Further relevant guidance is also contained in the [Defra Guidance for Successful Restoration of Mineral and Waste Sites](#)

6. Air Quality

Air quality in the UK has improved over recent decades but air pollution remains a significant issue; for example over 97% of sensitive habitat area in England is predicted to exceed the critical loads for ecosystem protection from atmospheric nitrogen deposition ([England Biodiversity Strategy](#), Defra 2011). A priority action in the England Biodiversity Strategy is to reduce air pollution impacts on biodiversity. The planning system plays a key role in determining the location of developments which may give rise to pollution, either directly or from traffic generation, and hence planning decisions can have a significant impact on the quality of air, water and land. The assessment should take account of the risks of air pollution and how these can be managed or reduced. Further information on air pollution impacts and the sensitivity of different habitats/designated sites can be found on the Air Pollution Information System (www.apis.ac.uk). Further information on air pollution modelling and assessment can be found on the Environment Agency website.

7. Climate Change Adaptation

The [England Biodiversity Strategy](#) published by Defra establishes principles for the consideration of biodiversity and the effects of climate change. The ES should reflect these principles and identify how the development's effects on the natural environment will be influenced by climate change, and how ecological networks will be maintained. The NPPF requires that the planning system should contribute to the enhancement of the natural environment 'by establishing coherent ecological networks that are more resilient to current and future pressures' ([NPPF](#) Para 174), which should be demonstrated through the ES.

8. Contribution to local environmental initiatives and priorities

The Roots of Rockingham, Back from the Brink project is currently being delivered within the local area, we strongly recommend that they are contacted to enable an assessment of opportunities and risk for the application site.

9. Cumulative and in-combination effects

A full consideration of the implications of the whole scheme should be included in the ES. All supporting infrastructure should be included within the assessment.

The ES should include an impact assessment to identify, describe and evaluate the effects that are likely to result from the project in combination with other projects and activities that are being, have been or will be carried out. The following types of projects should be included in such an assessment, (subject to available information):

- a. existing completed projects;
- b. approved but uncompleted projects;
- c. ongoing activities;
- d. plans or projects for which an application has been made and which are under consideration by the consenting authorities; and
- e. plans and projects which are reasonably foreseeable, i.e. projects for which an application has not yet been submitted, but which are likely to progress before completion of the development and for which sufficient information is available to assess the likelihood of cumulative and in-combination effects.

10. Ancient Woodland – addition to the S41 NERC Act paragraph

The S41 list includes six priority woodland habitats, which will often be ancient woodland, with all ancient semi-natural woodland in the South East falling into one or more of the six types.

Information about ancient woodland can be found in Natural England's standing advice http://www.naturalengland.org.uk/Images/standing-advice-ancient-woodland_tcm6-32633.pdf.

Ancient woodland is an irreplaceable resource of great importance for its wildlife, its history and the contribution it makes to our diverse landscapes. Local authorities have a vital role in ensuring its conservation, in particular through the planning system. The ES should have regard to the requirements under the NPPF (Para. 175)² which states:

When determining planning applications, local planning authorities should apply the following principles:

- a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts);
- c) development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists.

From: [REDACTED]
To: [East Northants Resource Management Facility Western Extension](#)
Subject: ENRMF
Date: 09 July 2020 15:26:22
Attachments: [image001.png](#)
[image002.jpg](#)
[Pre-ApplicationGuidanceNotev3.0..pdf](#)

Good afternoon,

At this stage the only comment we are able to make is that consideration should be given to the attached pre planning guidance.

Yours Sincerley

Alistair Brooker
Fire Protection Officer
Community Fire Protection Dept.
Northamptonshire Fire and Rescue Service
01604 797151
abrooker@northantsfire.gov.uk



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FIRE AND RESCUE PRE-APPLICATION INFORMATION, ADVICE AND GUIDANCE FOR DEVELOPERS DESIGNING NEW RESIDENTIAL AND COMMERCIAL DEVELOPMENT SCHEMES IN NORTHAMPTONSHIRE



PRODUCED BY NORTHAMPTONSHIRE FIRE AND RESCUE SERVICE (NFRS)



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1 Introduction and scope

This document has been produced by NFRS to provide information, advice and guidance to developers and support Local Planning Authorities (LPAs) on issues relating to fire safety at the development control stage when designing new residential and commercial development schemes.

When a planning application is submitted to the local Planning Department the Fire Service are consulted and where relevant, invited to make comment on the appropriate fire safety requirements for the application.

It is recognised that some of the information and guidance detailed within this document are not classed as material planning considerations as they are controlled through other legislation such as the Building Regulations, or support guidance provided by other consultees, for example Northamptonshire County Council's (NCC's) Highways department.

However, we would recommend and encourage that where information is not able to be considered as a material planning consideration the information/guidance contained within is still considered by developers as advice/information and implemented within development schemes as appropriate.

Dependent upon the type and size of the project our advice will concentrate on four key factors:

1. Access and Facilities for the Fire Service
2. Water Supplies for Firefighting
3. Regulatory Reform (Fire Safety Order) 2005
4. Goodwill Advice (including housing developments)

2 Access and facilities for the Fire Service

If the application involves the construction of a building you will be required to provide reasonable facilities for the Fire Service. In most circumstances this will mean providing vehicular access for fire appliances. It is important to remember that failure to do so may prevent the applicant from obtaining a completion certificate under the Building Regulations.

Vehicle access - domestic dwellings

There should be vehicle access for a pump appliance to **within 45m of all points within the dwelling house.**

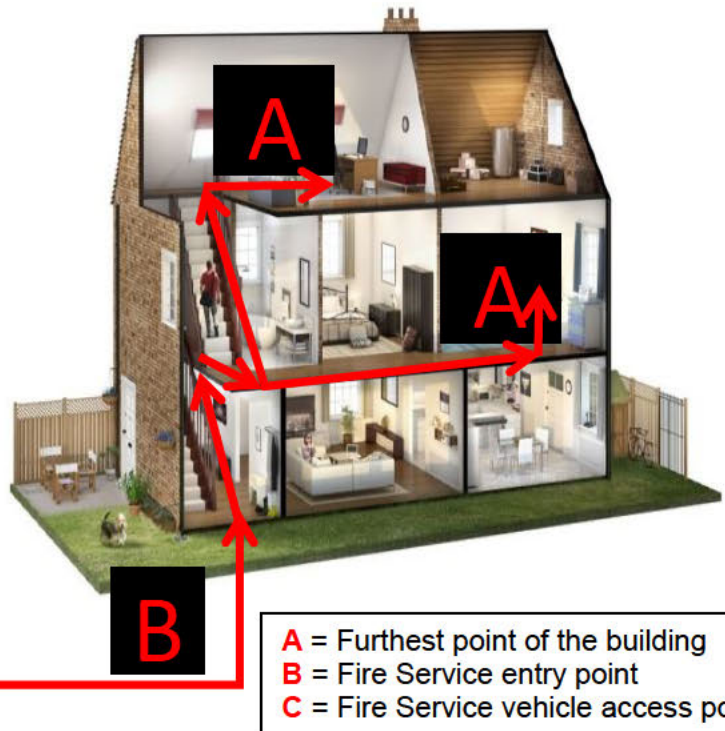
Every elevation to which vehicle access is provided in accordance with the above paragraph should have a suitable door(s), not less than 750mm wide, giving access to the interior of the building.

A vehicle access route may be a road or other route which, including any inspection covers and the like, meets the standards in [Tables 1](#) and [2](#) below.

Turning facilities should be provided in any dead end access route that is more than 20m in length. This can be by a hammerhead or turning circle. Private driveways are not an acceptable alternative.



N.B When taking into consideration the Firefighter travel distance, measure the 45m back from the furthest point of the dwelling before deciding the finishing point of the road or other suitable surface.



A to B to C must be less than or equal to 45m

Vehicle access - commercial property and blocks of flats not fitted with fire mains

There should be vehicle access for a pump appliance to small buildings (those of up to 2000m² with a top storey up to 11m above ground level) to either:

- 15% of the perimeter; or
- Within 45m of every point on the projected plan area of the building; whichever is the less onerous

For buildings greater than 2000m² vehicle access should be in accordance with Building Regulations [Approved Document B](#). Use the Approved Document B (fire safety) volume 2: buildings other than dwelling houses (2006 edition incorporating the 2010 and 2013 amendments); table 19. There should be vehicle access for a pump appliance to blocks of flats to within 45m of all points within each dwelling.

Table 1: Typical fire service route access specifications

Appliance type	Pump	High reach
Minimum width of road between kerbs (m)	3.7	3.7
Minimum width of gateways (m)	3.1	3.1
Minimum turning circle between kerbs (m)	16.8	26.0
Minimum turning circle between walls (m)	19.2	29.0
Minimum clearance height (m)	3.7	4.0
Minimum carrying capacity (tonnes from table 1)	23.0	27.0



Table 2: NFRS appliances that exceed typical fire service route access specifications

Vehicle	Pump
Scania/Combined Aerial Rescue Pump (CARP) appliances	23.0
Aerial Ladder Platform (ALP) (high reach vehicle)	27.0
Heavy Pumping Unit (HPU)	17.0
HPU (hose recovery)	17.0

Vehicle access – driveways

- Private driveways cannot be considered as an appropriate turning area
- If private driveways are considered to be access roads they should be capable of providing vehicular access as detailed above
- Due consideration has to be given to the maintenance of private driveways including trees, shrubbery and overhangs
- A risk assessment should be carried out for rural single dwellings that are beyond recommended guidance
- Demarcation markers maybe required to indicate actual usable road widths and soft verges
- A driveway and/or appliance may become damaged if an emergency vehicle enters an area that does not have suitable provision; this can seriously affect the response to an incident



Additional considerations

A question to ask when designing private driveways and plan on using them for fire services access is:

‘How will the crew, who are attending an emergency in the middle of the night, know if it is safe and suitable to use?’

Fire hydrants do not directly feed the fire hose; the water must first pass through the fire appliance. This can create a 80+ metre travel distance to produce firefighting water e.g. a hydrant is located at the end of a driveway 35+ metres away from the appliance access point which is 45 metres away from the furthest point of a building, creating an unnecessary delay. Trees should not be planted next to hydrant as the roots block the hydrant outlet.

3 Water supplies for firefighting

Recommended minimum flow rates and location of fire hydrants

The Local Government Association (LGA)/Water UK National guidance document details the following flow rates as the minimum necessary for firefighting, in particular risk categories where new developments are under construction.



Housing

Minimum of 8 l/sec (480 l/min) for detached or semi-detached of not more than two floors, and dwellings of more than two floors minimum of 20 l/sec (1200 l/min) from any single hydrant on the development. Hydrants cannot be kept on water mains below 90mm nominal diameter and preferably be on a water main of 100mm nominal diameter.

Transportation

Minimum of 25 l/sec (1500 l/min) for lorry/coach parks, multi-storey car parks and service stations from any hydrant on the development or within a vehicular distance of 90 metres from the complex.

Industry (industrial estates)

It is recommended that the water supply infrastructure should provide as follows with the mains network on site normally being at least 150mm nominal diameter:

- Up to one hectare minimum of 20 l/sec (1200 l/min)
- One to two hectares minimum of 35 l/sec (2100 l/min)
- Two to three hectares minimum of 50 l/sec (3000 l/min)
- Over three hectares minimum of 75 l/sec (4500 l/min)

Note: High risk areas may require greater flow rates

Shopping, offices, recreation and tourism

Minimum of 20 l/sec (1200 l/min) to 75 l/sec (4500 l/min) depending on the nature and extent of the development.

Education, health and community facilities

a. Village halls

Minimum of 15 l/sec (900 l/min) through any single hydrant on the development or within a vehicular distance of 100 metres from the complex.

b. Primary schools and single storey health centres

Minimum of 20 l/sec (1200 l/min) through any single hydrant on the development or within a vehicular distance of 70 metres of the complex.

c. Secondary schools, colleges, large health centres and community facilities

Minimum of 35 l/sec (2100 l/min) through any single hydrant on the development or within a vehicular distance of 70 metres from the complex.

Caravan sites - caravans/chalets

A fire hydrant should be located at the entrance to the site and if necessary, at 300 metre intervals. The hydrant should provide a minimum of 8 l/sec (480 l/min). If no piped water supply is available or where there is insufficient pressure or flow in the water main an alternative source must be provided. Suitable alternative sources are indicated on the following pages.

Building size

It is important to note that the current Building Regulations require an adequate water supply for firefighting. If the building has a compartment of 280m² or more in area and there is no existing fire hydrant within 100 metres, a reasonable water supply must be available.



Where no piped water supply is available, or there is insufficient pressure and flow in the water main, or an alternative arrangement is proposed, the alternative water supply can be one of the following:

- A spring, river, pond or canal which is capable of storing or providing at least 45,000 litres of water at all times of the year
- A charged static tank of at least 45,000 litres capacity

With both of the above options, suitable access, space and hard standing for a pumping appliance must be provided as specified in [tables 1](#) and [2](#). (see page 4/5)

For further details in relation to water provision for firefighting purposes please see below: <https://www.water.org.uk/publications/water-industry-guidance/national-guidance-document-provision-water-fire-fighting-3rd>

4 Regulatory Reform (Fire Safety) Order 2005

The Regulatory Reform (Fire Safety) Order applies to all premises apart from single private dwellings: <http://www.legislation.gov.uk/ukxi/2005/1541/contents/made>

Once the buildings are in use, they become subject to the Fire Safety Order, imposing requirements that may be additional to those of the Building Regulations.

General guidance: general fire precautions

The Responsible Person must take such general fire precautions that will ensure, so far as is reasonably practicable, the safety of his/her employees and relevant persons who are not their employees. The term 'general fire precautions' means:

- Measures to reduce or eliminate the risk of fire on the premises and the risk of the spread of fire on the premises
- The provision of suitable means of escape from the premises
- Measures for ensuring that the means of escape can be safely and effectively used at all times
- The provision of suitable and adequate firefighting equipment
- The provision of suitable means for detecting and giving warning of a fire on the premises
- Measures for ensuring the maintenance and testing of fire precautions and equipment



- The provision of suitable arrangements for the action to be taken in the event of a fire including:
 - a) Instruction and training for employees
 - b) Measures to mitigate the effects of a fire

Fire risk assessment

The Responsible Person must carry out a suitable and sufficient assessment of the risks to which persons are exposed to, for the purposes of identifying the general fire precautions measures to be taken in order to comply with 'the Order'.

A series of guidance booklets have been published by Central Government to assist Responsible People with this process, and these can be downloaded from the following web link: www.gov.uk/workplace-fire-safety-your-responsibilities/fire-safety-advice-documents.

5 Goodwill advice

Safeguarding people from the danger of fire in their homes and places of work is an emotive subject and unfortunately the fire services experience the consequences of failure on a regular basis.

Generally, through the application of approved guidance documents and the enforcement of regulations it is reasonable to assume that acceptable levels of fire safety within Northamptonshire are being provided. However, there are some factors particularly at the planning stage where the minimum standards fall short of what we consider being adequate.

Common areas of concern are:

- Planning applications in some rural areas where the response time of the nearest fire appliance can be up to 20 minutes
- The minimum access requirements for fire service vehicles cannot be met
- The risk profile of the building will be unknown until occupation takes place

In circumstances where the guidance requirements cannot be met, the fire service recommends the installation of a fire suppression system, i.e. an automatic sprinkler system.



Sprinklers and Suppression Systems

An example of a commercial fire sprinkler, (left) and a concealed residential sprinkler head (right).





Inexpensive

Residential fire sprinklers cost less than two per cent of an average new house – or about the price of good carpeting.

Effective

Fire sprinklers are by far the most efficient and effective safety devices available, having a better than 97% success rate world-wide.

Life safety record

In the UK, statistics show that there has never been a multiple loss of life in a fully sprinklered building.

Early alarm

More than 50% of all fire casualties are either young or old, or physically incapacitated. In conjunction with smoke alarms, fire sprinklers sound the alarm when they go off so they increase the time people have to escape or be rescued.

Reliability

They are designed to last for 50 years and the chance of accidental operation, due to manufacturers' defects, in service is 1:16,000,000 (one in sixteen million). Less than your chance of winning the lottery!

Operational facts

Each sprinkler is individually triggered by the heat of the fire and the system will gain control of the fire long before the Fire and Rescue Service is called. Only the sprinkler head near to the fire goes off - **not** all of them.

Limited water damage

Sprinklers use much less water than the Fire and Rescue Service. Because the sprinkler system tackles the fire immediately, it only has a small fire to deal with. In the event of a fire, the use of sprinklers will help minimise water damage.

Easy to install

Modern residential sprinklers are small, neat and unobtrusive and visitors are seldom able to spot them – concealed versions are now available.

Construction trade-offs

Sprinklers can save on construction costs because, under the Building Regulations, larger compartments or rooms may be constructed. Structural fire protection can also be reduced.

Environmental impact

Sprinklers can reduce greenhouse gas emissions by up to 98% and can also reduce fire damage, which ultimately means that less goes into our landfill sites.

Further guidance on residential sprinkler systems can be obtained by contacting:

The British Automatic Fire Sprinkler Association Ltd

Telephone: 01353 659 187

Website: www.bafsa.org.uk



Waste and Recycling Provision (bin stores)

The involvement of waste materials and wheelie bins in fires is often not recognised, so it is essential that safe, adequate waste management facilities (wheelie bin stores) are provided within all new developments. Combustible waste materials can attract and provide fuel for arsonists, and should therefore be secured.

NFRS ask developers to give careful consideration to the positioning of storage facilities for wheelie bins and 'Euro' Bins, and if no local adopted guidance is available would encourage developers to take on board the following points when designing schemes:



- Bin stores should, wherever possible, be external to the building, if this is not possible they **must not** be located in protected routes or stairwells, as in the event of fire this would compromise the escape route for any residents
- We recommend the ideal position for a bin store should be at least 8 metres away from any building
- Access to bin stores should not be sited next to escape routes, final exits or rear windows of dwellings
- Bin storage areas should be separated by structure giving 60 minutes fire resistance from the rest of the building
- Bin stores in Northamptonshire are currently constructed in a number of materials – timber, metal and brick, which all have their advantages; however NFRS prefer that bin stores are constructed from brick
- Exterior bin stores should be built where there is natural surveillance and reasonable lighting to improve security
- The store should be locked if possible with only residents having access
- The location of bin stores must not restrict access to fire hydrant locations
- To facilitate easy movement of refuse collection lorries, local authorities with responsibility for waste management may recommend that they should not be more than 15 metres from the highway, and residents should not have to travel more than 30 metres to deposit refuse

Car parking provision

Development schemes must have adequate off-street parking provision to reduce roadside parking and therefore reduce any impact on emergency service access and operational response times.

6 Planning out crime in Northamptonshire

NFRS work closely with Northamptonshire Police and other stakeholders to reduce crime and the fear of crime by ensuring that new developments incorporate crime prevention measures through design.

Crime and anti-social behaviour does not just impact on the police, but also on a wide range of other stakeholders, including NFRS. For example, poorly designed developments can increase the occurrence of crime and anti-social behaviour such as



arson which leads to increased pressure on the Fire and Rescue Service.

It is therefore essential that developers take into consideration the principles set out within the 'Planning out Crime in Northamptonshire' Supplementary Planning Document (SPD) when designing schemes.

7 Final thoughts

This guide is aimed at providing the relevant guidance, and the reasoning for fire service needs, at the earliest opportunity thereby allowing the planning and design of developments to take into account Fire and Rescue Service needs in the event of a fire.

It is our view that by incorporating this guidance within designs will help create safer developments which, when the worst happens and fires occur, will have the provision to allow an effective emergency response.

There are numerous instances each year where officers are asked to meet with developers and architects and discuss issues with projects, sometimes at the very late stages e.g. the building are built. Solutions at such stages are always difficult and in some cases not possible, the outcome can be that premises are completed with a lesser provision than we would want or need.

We see that the provision of this guide and its use at the early stages would avoid the vast majority of issues and if not would allow for early proactive discussion prior to the point where alterations are not possible.

Telephone: 01733 453410 (open 9am - 1pm)
Email: planningcontrol@peterborough.gov.uk
Case Officer: Mr A O Jones
Our Ref: 20/00706/CONSUL
Your Ref: WS010005_000008_200702

PETERBOROUGH



Planning Services

Sand Martin House
Bittern Way
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PE2 8TY

Ms Marie Shoesmith
The Planning Inspectorate
Major Casework Directorate
Temple Quay House
2 The Square
Bristol
BS1 6PN

Peterborough Direct: 01733 747474

23 July 2020

Dear Ms Shoesmith

Planning enquiry

Proposal: Consultation request on Scoping Opinion as to the information to be provided in an Environmental Statement

Site address: East Northants Resource Management Facility Western Extension

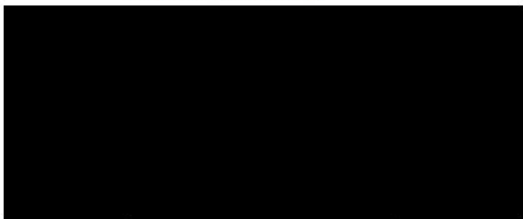
Your client: Augean South Limited

Further to your enquiry received on 2 July 2020, in respect of the above, the Local Planning Authority makes the following comments:

The scope and extent of the EIA Scoping Report (Report Reference: AU/KCW/LZH/1724/01/SCF) appear to be appropriate and we have no objection to the matters / aspects to be scoped out. We therefore have no comment to make on it.

I trust that the above advice is of use however should you have any further queries, please do not hesitate to contact me on the details shown at the top of this letter.

Yours sincerely



Mr A O Jones
Principal Minerals and Waste Officer



Public Health
England

Environmental Hazards and
Emergencies Department
Centre for Radiation, Chemical and
Environmental Hazards (CRCE)
Seaton House
City Link
London Road
Nottingham
NG2 4LA

nsipconsultations@phe.gov.uk

www.gov.uk/phe

Your Ref: WS010005

Our Ref: 53763

Ms Marie Shoesmith
Senior EIA Advisor
Major Casework Directorate
The Planning Inspectorate,
Temple Quay House,
Temple Quay,
Bristol, BS1 6PN

27th July 2020

Dear Ms Shoesmith

**Nationally Significant Infrastructure Project
Application by Augean South Limited (the Applicant) for an Order granting Development
Consent for the East Northants Resource Management Facility Western Extension (the
Proposed Development) - Scoping Consultation Stage**

Thank you for including Public Health England (PHE) in the scoping consultation phase of the above application. Advice offered by PHE is impartial and independent.

PHE exists to protect and improve the nation's health and wellbeing and reduce health inequalities; these two organisational aims are reflected in the way we review and respond to Nationally Significant Infrastructure Project (NSIP) applications.

The health of an individual or a population is the result of a complex interaction of a wide range of different determinants of health, from an individual's genetic make-up, to lifestyles and behaviours, and the communities, local economy, built and natural environments to global ecosystem trends. All developments will have some effect on the determinants of health, which in turn will influence the health and wellbeing of the general population, vulnerable groups and individual people. Although assessing impacts on health beyond direct effects from for example emissions to air or road traffic incidents is complex, there is a need to ensure a proportionate assessment focused on an application's significant effects.

Environmental Public Health

We understand that the promoter will wish to avoid unnecessary duplication and that many issues including air quality, emissions to water, waste, contaminated land etc. will be covered elsewhere in the Environmental Statement (ES). PHE believes the summation of relevant issues into a specific section of the report provides a focus which ensures that public health is given adequate consideration. The section should summarise key information, risk assessments, proposed mitigation measures, conclusions and residual impacts relating to human health. Compliance with

the requirements of National Policy Statements and relevant guidance and standards should also be highlighted.

In terms of the level of detail to be included in an ES, we recognise that the differing nature of projects is such that their impacts will vary. The attached appendix summarises PHE's requirements and recommendations regarding the content of and methodology used in preparing the ES. Please note that where impacts relating to health and/or further assessments are scoped out, promoters should fully explain and justify this within the submitted documentation.

Recommendations

Our position is that pollutants associated with road traffic or combustion, particularly particulate matter and oxides of nitrogen are non-threshold; ie, an exposed population is likely to be subject to potential harm at any level and that reducing public exposures of non-threshold pollutants (such as particulate matter and nitrogen dioxide) below air quality standards will have potential public health benefits. We support approaches which minimise or mitigate public exposure to non-threshold air pollutants, address inequalities (in exposure), maximise co-benefits (such as physical exercise). We encourage their consideration during development design, environmental and health impact assessment, and development consent.

Human Health and Wellbeing

All developments will have some effect on the determinants of health, which in turn will influence the health and wellbeing of the general population, vulnerable groups and individual people. Although assessing impacts on health beyond direct effects from for example emissions to air or road traffic incidents is complex, there is a need to ensure a proportionate assessment focused on an application's significant effects.

This section of PHE's scoping response, and the associated health and wellbeing scoping table ([Appendix 1, Table 1](#)), identifies the wider determinants of health and wellbeing we expect your assessment to address and to demonstrate whether they are likely to give rise to significant effects.

PHE expects a proportionate and evidence-based assessment of indirect effects on health and wellbeing in line with the relevant regulatory and policy requirements. To assist developers PHE has focused its approach on scoping determinants of health and wellbeing under four themes, which have been derived from an analysis of the wider determinants of health mentioned in the National Policy Statements. The four themes are:

- Access
- Traffic and Transport
- Socioeconomic
- Land Use

The HWB Scoping Appendix sets out information relevant to a series of specific health determinants under each of the themes listed above. PHE has identified that each of the determinants set out in the HWB Scoping Appendix require further consideration in your assessment; the table also includes the following:

- Evidence demonstrating the link between the determinant of health and related health outcomes

- Some examples of key national policy documents related to this determinant.

PHE have reviewed the Scoping Report and have the following additional recommendations:

- That the local transport authority consults with the Local Director of Public Health when conducting the transport assessment to ensure the local health needs are taken into account.
- The final ES provides a chapter assessing the impact of the development on human health, to include an assessment of the wider determinants of health. Additional information can be found [here](#).
- The final ES addresses the health impact of losing some access to greenspace
- The final ES addresses the impact of the development on local employment.
- The final ES addresses the local indices of multiple deprivation (IMD). The development must not contribute to the widening of health inequality
- The final ES addresses the cumulative effects of the development on the mental health of the population
- The final ES addresses the impact of the development on traffic and highways safety, and how this affects levels of walking and cycling (impact on physical activity and obesity)
- The final ES contains a sufficiently detailed Travel Plan, and Construction Traffic Management Plan

If you require any clarification on the above points or wish to discuss any particular issues, please do not hesitate to contact us.

Yours sincerely,

For and on behalf of Public Health England
nsipconsultations@phe.gov.uk

Please mark any correspondence for the attention of National Infrastructure Planning Administration.

Appendix: PHE recommendations regarding the scoping document

Introduction

The Planning Inspectorate's Advice Note 11: Working with Public Bodies covers many of the generic points of interaction relevant to the Planning Inspectorate and Public Health England (PHE). The purpose of this Annex is to help applicants understand the issues that PHE expect to see addressed by applicants preparing an Environmental Statement (ES) as part of their Nationally Significant Infrastructure Planning (NSIP) submission.

We have included a comprehensive outline of the type of issues we would expect to be considered as part of an NSIP which falls under the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations). PHE encourages applicants to contact us as early in the process as possible if they wish to discuss or clarify any matters relating to chemical, poison, radiation or wider public health.

General Information on Public Health England

PHE was established on 1 April 2013 to bring together public health specialists from more than 70 organisations into a single public health service. We are an executive agency of the Department of Health and are a distinct delivery organisation with operational autonomy to advise and support government, local authorities and the National Health Service (NHS) in a professionally independent manner.

We operate across 7 regions in England and work closely with public health professionals in Wales, Scotland and Northern Ireland, and internationally.¹ We have specialist teams advising on specific issues such as the potential impacts of chemicals, air quality, ionising and non-ionising radiation and other factors which may have an impact on public health, as well as on broader issues such as the wider determinants of health, health improvement and health inequalities.

PHE's NSIP related roles and responsibilities and geographical extent

PHE is a statutory consultee in the NSIP process for any *applications likely to involve chemicals, poisons or radiation which could potentially cause harm to people and are likely to affect significantly public health.*² PHE will consider the potential significant effects (direct and indirect) of a proposed development on population and human health and the impacts from chemicals, radiation and environmental hazards.

Under certain circumstances PHE may provide comments on ionising radiation to/on behalf of the Scottish Parliament. If a proposer is submitting a planning application in Scotland which may require advice on radiation you are recommended to contact the appropriate Scottish Planning Authority for advice on how to proceed.

In the case of applications in Wales, PHE remains a statutory consultee but the regime applies to a more limited range of development types. For NSIP applications likely to affect land in Wales, an applicant should still consult PHE but, additionally will be required to consult the Welsh Ministers.

Role of Public Health England and NSIP with respect to Environmental Impact Assessments

PHE has a statutory role as a consultation body under the EIA Regulations. Where an applicant has requested a scoping opinion from the Planning Inspectorate³ in relation to a proposed NSIP, PHE will be consulted by the Planning Inspectorate about the scope, and level of detail, of the information to be provided in the ES and will be under a duty to make information available to the applicant. PHE's standard recommendations in response to EIA scoping consultations are below.

¹ <https://www.gov.uk/government/organisations/public-health-england/about#priorities>

² The Infrastructure Planning (Interested Parties and Miscellaneous Prescribed Provisions) Regulations 2015

³ The scoping process is administered and undertaken by the Planning Inspectorate on behalf of the Secretary of State

PHE also encourages applicants to discuss with them the scope of the ES at an early stage to explore, for example, whether careful site selection or other design issues could minimise or eliminate public health impacts or to outline the requirement for, scope and methodology of any assessments related to public health.

PHE's recommendations to applicants regarding Environmental Impact Assessments General approach

Applicants are reminded that Section 5(2)(a) of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 specifically includes a requirement that the EIA must identify, describe and assess in an appropriate manner, in light of each individual case, the direct and indirect significant effects of the proposed development on population and human health.

PHE is of the opinion that this requirement encompasses the wider determinants of public health, as well as chemicals, poisons and radiation. Further information on PHE's recommendations and requirements is included below.

It is the role of the applicant to prepare the ES. PHE provides advice relating to EIA within this document and during the NSIP consultation stages.

When preparing an ES the applicant should give consideration to best practice guidance such as the Government's Handbook for scoping projects: environmental impact assessment⁴, IEMA Guide to Delivering Quality Developments⁵, and Guidance: on Environmental Impact Assessment⁶

The Planning Inspectorate's Advice Note Seven: Environmental Impact Assessment: Process, Preliminary Environmental Information and Environmental Statements also provide guidance to applicants and other persons with interest in the EIA process as it relates to NSIPs.

It is important that the submitted ES identifies and assesses the potential public health impacts of the activities at, and emissions from, the development.

PHE understands that there may be separate sections of the ES covering the assessment of impacts on air, land, water and so on, but expects an ES to include a specific section summarising potential impacts on population and health. This section should bring together and interpret the information from other assessments as necessary. The health and population impacts section should address the following steps:

1. Screening: Identify and significant effects.
 - a. Summarise the methodologies used to identify health impacts, assess significance and sources of information
 - b. Evaluate any reference standards used in carrying out the assessment and in evaluating health impacts (e.g., environmental quality standards)
 - c. Where the applicant proposes the 'scoping out' of any effects a clear rationale and justification should be provided along with any supporting evidence.
2. Baseline Survey:
 - a. Identify information needed and available, Evaluate quality and applicability of available information
 - b. Undertake assessment

⁴ <https://www.gov.uk/government/publications/handbook-for-scoping-projects-environmental-impact-assessment>

⁵ <https://www.iema.net/assets/newbuild/documents/Delivering%20Quality%20Development.pdf>

⁶ <https://www.gov.uk/guidance/environmental-impact-assessment#the-purpose-of-environmental-impact-assessment>

3. Alternatives:
 - a. Identify and evaluate any realistic alternative locations, routes, technology etc.
4. Design and assess possible mitigation
 - a. Consider and propose suitable corrective actions should mitigation measures not perform as effectively predicted.
5. Impact Prediction: Quantify and Assess Impacts:
 - a. Evaluate and assess the extent of any positive and negative effects of the development. Effects should be assessed in terms of likely health outcomes, including those relating to the wider determinants of health such as socio-economic outcomes, in addition to health outcomes resulting from exposure to environmental hazards. Mental health effects should be included and given equivalent weighting to physical effects.
 - b. Clearly identify any omissions, uncertainties and dependencies (e.g., air quality assessments being dependant on the accuracy of traffic predictions)
 - c. Evaluate short-term impacts associated with the construction and development phase
 - d. Evaluate long-term impacts associated with the operation of the development
 - e. Evaluate any impacts associated with decommissioning
 - f. Evaluate any potential cumulative impacts as a result of the development, currently approved developments which have yet to be constructed, and proposed developments which do not currently have development consent
6. Monitoring and Audit (not a statutory requirement)
 - a. Identify key modelling predictions and mitigation impacts and consider implementing monitoring and audit to assess their accuracy / effectiveness.

Any assessments undertaken to inform the ES should be proportionate to the potential impacts of the proposal, therefore we accept that, in some circumstances particular assessments may not be relevant to an application, or that an assessment may be adequately completed using a qualitative rather than quantitative methodology. In cases where this decision is made, the applicant should fully explain and justify their rationale in the submitted documentation.

Consideration of alternatives (including alternative sites, choice of process, and the phasing of construction) is widely regarded as good practice. Ideally, the EIA process should start at the stage of site selection, so that the environmental merits of practicable alternatives can be properly considered. Where this is undertaken, the main alternatives considered should be outlined in the ES⁷.

Human and environmental receptors

The applicant should clearly identify the development's location and the location and distance from the development of off-site human receptors that may be affected by emissions from, or activities at, the development. Off-site human receptors may include people living in residential premises; people working in commercial, and industrial premises and people using transport infrastructure (such as roads and railways), recreational areas, and publicly accessible land.

Identify and consider impacts on residential areas and sensitive receptors (such as schools, nursing homes and healthcare facilities, as well as other vulnerable population groups such as those who are young, older, with disabilities or long-term conditions, or on low incomes) in the area(s) which may be affected by emissions, this should include consideration of any new receptors arising from future development.

⁷ DCLG guidance, 1999 <http://www.communities.gov.uk/documents/planningandbuilding/pdf/155958.pdf>

Consideration should also be given to environmental receptors such as the surrounding land, watercourses, surface and groundwater, and drinking water supplies such as wells, boreholes and water abstraction points.

Impacts arising from construction and decommissioning

Any assessment of impacts arising from emissions or activities due to construction and decommissioning should consider potential impacts on all receptors and describe monitoring and mitigation during these phases. Construction and decommissioning will be associated with vehicle movements and cumulative impacts should be accounted for.

We would expect the applicant to follow best practice guidance during all phases from construction to decommissioning to ensure appropriate measures are in place to mitigate any potential negative impact on health from emissions (point source, fugitive and traffic-related) and activities. An effective Construction Environmental Management Plan (CEMP) (and Decommissioning Environmental Management Plan (DEMP)) will help provide reassurance that activities are well managed. The applicant should ensure that there are robust mechanisms in place to respond to any complaints made during construction, operation, and decommissioning of the facility.

Emissions to air and water

Significant impacts are unlikely to arise from industrial installations which employ Best Available Techniques (BAT) and which meet regulatory requirements concerning emission limits and design parameters. However, PHE has a number of comments regarding the assessment of emissions from any type of development in order that the ES provides a comprehensive assessment of potential impacts.

When considering a baseline (of existing environmental quality) and in the assessment and future monitoring of impacts these should:

- include appropriate screening assessments and detailed dispersion modelling where this is screened as necessary
- encompass the combined impacts of all pollutants which may be emitted by the development with all pollutants arising from associated development and transport, considered in a single holistic assessment (ie, of overall impacts)
- include Chemical Abstract Service (CAS) numbers alongside chemical names, where referenced in the ES
- consider the construction, operational, and decommissioning phases
- consider the typical operational emissions and emissions from start-up, shut-down, abnormal operation and accidents when assessing potential impacts and include an assessment of worst-case impacts
- fully account for fugitive emissions
- include appropriate estimates of background levels
 - when assessing the human health risk of a chemical emitted from a facility or operation, background exposure to the chemical from other sources should be taken into account
- identify cumulative and incremental impacts (ie, assess cumulative impacts from multiple sources), including those arising from associated development, other existing and proposed development in the local area, and new vehicle movements associated with the proposed development; associated transport emissions should include consideration of non-road impacts (ie, rail, sea, and air)
- include consideration of local authority, Environment Agency, Natural Resources Wales, Defra national network, and any other local site-specific sources of monitoring data
- compare predicted environmental concentrations to the applicable standard or guideline value for the affected medium. Where available, the most recent UK standards for the appropriate media (ie, air, water, and/or soil) and health-based guideline values should be used when quantifying the risk to human health from chemical pollutants
- where UK standards or guideline values are not available, use those recommended by the European Union or World Health Organization:

- If no standard or guideline value exists, the predicted exposure to humans should be estimated and compared to an appropriate health-based value (e.g., a Tolerable Daily Intake or equivalent)
- This should consider all applicable routes of exposure (e.g., include consideration of aspects such as the deposition of chemicals emitted to air and their uptake via ingestion)
- when quantitatively assessing the health risk of genotoxic and carcinogenic chemical pollutants, PHE does not favour the use of mathematical models to extrapolate from high dose levels used in animal carcinogenicity studies to well below the observed region of a dose-response relationship. When only animal data are available, we recommend that the 'Margin of Exposure' (MOE) approach¹ is used
- identify and consider impacts on residential areas and sensitive receptors (such as schools, nursing homes and healthcare facilities) in the area(s) which may be affected by emissions. This should include consideration of any new receptors arising from future development

Whilst screening of impacts using qualitative methodologies is common practice (eg, for impacts arising from fugitive emissions such as dust), where it is possible to undertake a quantitative assessment of impacts then this should be undertaken.

PHE's view is that the applicant should appraise and describe the measures that will be used to control both point source and fugitive emissions and demonstrate that standards, guideline values or health-based values will not be exceeded due to emissions from the installation, as described above. This should include consideration of any emitted pollutants for which there are no set emission limits. When assessing the potential impact of a proposed installation on environmental quality, predicted environmental concentrations should be compared to the permitted concentrations in the affected media; this should include both standards for short and long-term exposure. Further to assessments of compliance with limit values, for non-threshold pollutants (i.e., those that have no threshold below which health effects do not occur) the **benefits** of development options which reduce population exposure should be evaluated.

Additional points specific to emissions to air

When considering baseline conditions (of existing air quality) and the assessment and future monitoring of impacts, these should include:

- consideration of impacts on existing areas of poor air quality e.g. existing or proposed local authority Air Quality Management Areas (AQMAs)
- modelling using appropriate meteorological data (i.e. come from the nearest suitable meteorological station and include a range of years and worst-case conditions)
- modelling taking into account local topography, congestion and acceleration
- evaluation of the public health **benefits** of development options which reduce air pollution – even below limit values – as pollutants such as nitrogen dioxide and particulate matter show no threshold below which health effects do not occur

Additional points specific to emissions to water

When considering baseline conditions (of existing water quality) and the assessment and future monitoring of impacts, these should:

- include assessment of potential impacts on human health and not focus solely on ecological impacts
- identify and consider all routes by which emissions may lead to population exposure (e.g., surface watercourses, recreational waters, sewers, geological routes etc.)
- assess the potential off-site effects of emissions to groundwater (e.g., on aquifers used for drinking water) and surface water (used for drinking water abstraction) in terms of the potential for population exposure
- include consideration of potential impacts on recreational users (e.g., from fishing, canoeing etc.) alongside assessment of potential exposure via drinking water

Land quality

We would expect the applicant to provide details of any hazardous contamination present on site (including ground gas) as part of a site condition report.

Emissions to and from the ground should be considered in terms of the previous history of the site and the potential of the site, once operational, to give rise to issues. Public health impacts associated with ground contamination and/or the migration of material off-site should be assessed⁸ and the potential impact on nearby receptors and control and mitigation measures should be outlined.

Relevant areas outlined in the Government's Good Practice Guide for EIA include:

- effects associated with ground contamination that may already exist
- effects associated with the potential for polluting substances that are used (during construction / operation) to cause new ground contamination issues on a site, for example introducing / changing the source of contamination
- impacts associated with re-use of soils and waste soils, for example, re-use of site-sourced materials on-site or offsite, disposal of site-sourced materials offsite, importation of materials to the site, etc.

Waste

The applicant should demonstrate compliance with the waste hierarchy (e.g. with respect to re-use, recycling or recovery and disposal).

For wastes arising from the development the ES should assess:

- the implications and wider environmental and public health impacts of different waste disposal options
- disposal route(s) and transport method(s) and how potential impacts on public health will be mitigated

If the development includes wastes delivered to the installation:

- Consider issues associated with waste delivery and acceptance procedures (including delivery of prohibited wastes) and should assess potential off-site impacts and describe their mitigation

Other aspects

Within the ES, PHE would expect to see information about how the applicant would respond to accidents with potential off-site emissions (e.g., flooding or fires, spills, leaks or releases off-site). Assessment of accidents should: identify all potential hazards in relation to construction, operation and decommissioning; include an assessment of the risks posed; and identify risk management measures and contingency actions that will be employed in the event of an accident in order to mitigate off-site effects.

PHE would expect the applicant to consider the COMAH Regulations (Control of Major Accident Hazards) and the Major Accident Off-Site Emergency Plan (Management of Waste from Extractive Industries) (England and Wales) Regulations: both in terms of their applicability to the development itself, and the development's potential to impact on, or be impacted by, any nearby installations themselves subject to these Regulations.

There is evidence that, in some cases, perception of risk may have a greater impact on health than the hazard itself. A 2009 report⁹, jointly published by Liverpool John Moores University and the Health Protection Agency (HPA), examined health risk perception and environmental problems using a number of case studies. As a point to consider, the report suggested: "*Estimation of*

⁸ Following the approach outlined in the section above dealing with emissions to air and water i.e. comparing predicted environmental concentrations to the applicable standard or guideline value for the affected medium (such as Soil Guideline Values)

⁹ Available from: <http://www.cph.org.uk/wp-content/uploads/2012/08/health-risk-perception-and-environmental-problems--summary-report.pdf>

community anxiety and stress should be included as part of every risk or impact assessment of proposed plans that involve a potential environmental hazard. This is true even when the physical health risks may be negligible." PHE supports the inclusion of this information within ES' as good practice.

Electromagnetic fields (EMF)

This advice relates to electrical installations such as substations and connecting underground cables or overhead lines. PHE advice on the health effects of power frequency electric and magnetic fields is available on the Gov.UK website.¹⁰

There is a potential health impact associated with the electric and magnetic fields around substations, overhead power lines and underground cables. The field strengths tend to reduce with distance from such equipment.

The following information provides a framework for considering the health impact associated with the electric and magnetic fields produced by the proposed development, including the direct and indirect effects of the electric and magnetic fields as indicated above.

Policy Measures for the Electricity Industry

A voluntary code of practice is published which sets out key principles for complying with the ICNIRP guidelines.¹¹

Companion codes of practice dealing with optimum phasing of high voltage power lines and aspects of the guidelines that relate to indirect effects are also available.^{12,13}

Exposure Guidelines

PHE recommends the adoption in the UK of the EMF exposure guidelines published by the International Commission on Non-ionizing Radiation Protection (ICNIRP). Formal advice to this effect, based on an accompanying comprehensive review of the scientific evidence, was published in 2004 by the National Radiological Protection Board (NRPB), one of PHE's predecessor organisations¹⁴

Updates to the ICNIRP guidelines for static fields have been issued in 2009 and for low frequency fields in 2010. However, Government policy is that the ICNIRP guidelines are implemented as expressed in the 1999 EU Council Recommendation on limiting exposure of the general public (1999/519/EC):¹⁵

Static magnetic fields

For static magnetic fields, the ICNIRP guidelines published in 2009 recommend that acute exposure of the general public should not exceed 400 mT (millitesla), for any part of the body, although the previously recommended value of 40 mT is the value used in the Council Recommendation. However, because of potential indirect adverse effects, ICNIRP recognises that practical policies need to be implemented to prevent inadvertent harmful exposure of people with implanted electronic medical devices and implants containing ferromagnetic materials, and injuries due to flying ferromagnetic objects, and these considerations can lead to much lower restrictions, such as 0.5 mT.

¹⁰ <https://www.gov.uk/government/collections/electromagnetic-fields#low-frequency-electric-and-magnetic-fields>

¹¹ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/37447/1256-code-practice-emf-public-exp-guidelines.pdf

¹² https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/48309/1255-code-practice-optimum-phasing-power-lines.pdf

¹³ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/224766/powerlines_vcop_microshocks.pdf

¹⁴

<http://webarchive.nationalarchives.gov.uk/20140629102627/http://www.hpa.org.uk/Publications/Radiation/NPRBArchive/DocumentsOfTheNRPB/Absd1502/>

¹⁵ http://webarchive.nationalarchives.gov.uk/+www.dh.gov.uk/en/PublicHealth/Healthprotection/DH_4089500

Power frequency electric and magnetic fields

At 50 Hz, the known direct effects include those of induced currents in the body on the central nervous system (CNS) and indirect effects include the risk of painful spark discharge on contact with metal objects exposed to electric fields. The ICNIRP guidelines published in 1998 give reference levels for public exposure to 50 Hz electric and magnetic fields, and these are respectively 5 kV m⁻¹ (kilovolts per metre) and 100 µT (microtesla). The reference level for magnetic fields changes to 200 µT in the revised (ICNIRP 2010) guidelines because of new basic restrictions based on induced electric fields inside the body, rather than induced current density. If people are not exposed to field strengths above these levels, direct effects on the CNS should be avoided and indirect effects such as the risk of painful spark discharge will be small. The reference levels are not in themselves limits but provide guidance for assessing compliance with underlying basic restrictions and reducing the risk of indirect effects.

Long term effects

There is concern about the possible effects of long-term exposure to electromagnetic fields, including possible carcinogenic effects at levels much lower than those given in the ICNIRP guidelines. In the NRPB advice issued in 2004, it was concluded that the studies that suggest health effects, including those concerning childhood leukaemia, could not be used to derive quantitative guidance on restricting exposure. However, the results of these studies represented uncertainty in the underlying evidence base, and taken together with people's concerns, provided a basis for providing an additional recommendation for Government to consider the need for further precautionary measures, particularly with respect to the exposure of children to power frequency magnetic fields.

The Stakeholder Advisory Group on ELF EMFs (SAGE)

The Stakeholders Advisory Group on ELF EMF's (SAGE) was set up to explore the implications for a precautionary approach to extremely low frequency electric and magnetic fields (ELF EMFs), and to make practical recommendations to Government:¹⁶ Relevant here is SAGE's 2007 First Interim Assessment, which makes several recommendations concerning high voltage power lines. Government supported the implementation of low cost options such as optimal phasing to reduce exposure; however it did not support the option of creating corridors around power lines in which development would be restricted on health grounds, which was considered to be a disproportionate measure given the evidence base on the potential long term health risks arising from exposure. The Government response to SAGE's First Interim Assessment is available on the national archive website.¹⁷

The Government also supported calls for providing more information on power frequency electric and magnetic fields, which is available on the PHE web pages.

Ionising radiation

Particular considerations apply when an application involves the possibility of exposure to ionising radiation. In such cases it is important that the basic principles of radiation protection recommended by the International Commission on Radiological Protection¹⁸ (ICRP) are followed. PHE provides advice on the application of these recommendations in the UK. The ICRP recommendations are implemented in the Euratom Basic Safety Standards¹⁹ (BSS) and these form the basis for UK

¹⁶ <http://www.emfs.info/policy/sage/>

¹⁷

http://webarchive.nationalarchives.gov.uk/20130107105354/http://www.dh.gov.uk/en/Publicationsandstatistics/Publications/PublicationsPolicyAndGuidance/DH_107124

¹⁸ These recommendations are given in publications of the ICRP notably publications 90 and 103 see the website at <http://www.icrp.org/>

¹⁹ Council Directive 96/29/EURATOM laying down basic safety standards for the protection of the health of workers and the general public against the dangers arising from ionising radiation.

legislation, including the Ionising Radiation Regulations 1999, the Radioactive Substances Act 1993, and the Environmental Permitting Regulations 2016.

As part of the EIA process PHE expects applicants to carry out the necessary radiological impact assessments to demonstrate compliance with UK legislation and the principles of radiation protection. This should be set out clearly in a separate section or report and should not require any further analysis by PHE. In particular, the important principles of justification, optimisation and radiation dose limitation should be addressed. In addition, compliance with the Euratom BSS and UK legislation should be clear.

When considering the radiological impact of routine discharges of radionuclides to the environment PHE would, as part of the EIA process, expect to see a full radiation dose assessment considering both individual and collective (population) doses for the public and, where necessary, workers. For individual doses, consideration should be given to those members of the public who are likely to receive the highest exposures (referred to as the representative person, which is equivalent to the previous term, critical group).

Different age groups should be considered as appropriate and should normally include adults, 1 year old and 10-year-old children. In particular situations doses to the foetus should also be calculated²⁰.

The estimated doses to the representative person should be compared to the appropriate radiation dose criteria (dose constraints and dose limits), taking account of other releases of radionuclides from nearby locations as appropriate. Collective doses should also be considered for the UK, European and world populations where appropriate.

The methods for assessing individual and collective radiation doses should follow the guidance given in 'Principles for the Assessment of Prospective Public Doses arising from Authorised Discharges of Radioactive Waste to the Environment August 2012'²¹

It is important that the methods used in any radiological dose assessment are clear and that key parameter values and assumptions are given (for example, the location of the representative persons, habit data and models used in the assessment).

Any radiological impact assessment, undertaken as part of the EIA, should also consider the possibility of short-term planned releases and the potential for accidental releases of radionuclides to the environment. This can be done by referring to compliance with the Ionising Radiation Regulations and other relevant legislation and guidance.

The radiological impact of any solid waste storage and disposal should also be addressed in the assessment to ensure that this complies with UK practice and legislation; information should be provided on the category of waste involved (e.g. very low-level waste, VLLW). It is also important that the radiological impact associated with the decommissioning of the site is addressed.

Of relevance here is PHE advice on radiological criteria and assessments for land-based solid waste disposal facilities²². PHE advises that assessments of radiological impact during the operational phase should be performed in the same way as for any site authorised to discharge radioactive waste. PHE also advises that assessments of radiological impact during the post

²⁰ HPA (2008) Guidance on the application of dose coefficients for the embryo, fetus and breastfed infant in dose assessments for members of the public. Doc HPA, RCE-5, 1-78, available at

<https://www.gov.uk/government/publications/embryo-fetus-and-breastfed-infant-application-of-dose-coefficients>

²¹ The Environment Agency (EA), Scottish Environment Protection Agency (SEPA), Northern Ireland Environment Agency, Health Protection Agency and the Food Standards Agency (FSA).

Principles for the Assessment of Prospective Public Doses arising from Authorised Discharges of Radioactive Waste to the Environment August 2012.

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/296390/qeho1202bklh-e-e.pdf

²² HPA RCE-8, Radiological Protection Objectives for the Land-based Disposal of Solid Radioactive Wastes, February 2009

operational phase of the facility should consider long timescales (possibly in excess of 10,000 years) that are appropriate to the long-lived nature of the radionuclides in the waste, some of which may have half-lives of millions of years.

The radiological assessment should consider exposure of members of hypothetical representative groups for a number of scenarios including the expected migration of radionuclides from the facility, and inadvertent intrusion into the facility once institutional control has ceased.

For scenarios where the probability of occurrence can be estimated, both doses and health risks should be presented, where the health risk is the product of the probability that the scenario occurs, the dose if the scenario occurs and the health risk corresponding to unit dose.

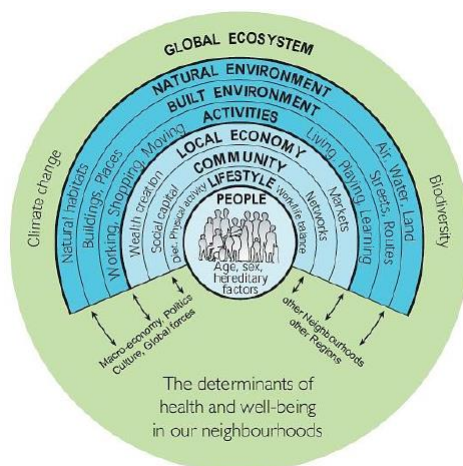
For inadvertent intrusion, the dose if the intrusion occurs should be presented. It is recommended that the post-closure phase be considered as a series of timescales, with the approach changing from more quantitative to more qualitative as times further in the future are considered.

The level of detail and sophistication in the modelling should also reflect the level of hazard presented by the waste. The uncertainty due to the long timescales means that the concept of collective dose has very limited use, although estimates of collective dose from the 'expected' migration scenario can be used to compare the relatively early impacts from some disposal options if required.

Wider Determinants of Health

World Health Organization (WHO's) defines health as "a state of complete physical, mental and social well-being and not merely an absence of disease or infirmity" (WHO, 1948).

The health of an individual or a population is the result of a complex interaction of a wide range of different determinants of health, from an individual's genetic make-up, to lifestyles and behaviours, and the communities, local economy, built and natural environments to global ecosystem trends. All developments will have some effect on the determinants of health, which in turn will influence the health and wellbeing of the general population, vulnerable groups and individual people.



Barton and Grant²³

PHE recognises that evaluating an NSIP's impacts on health through the wider determinants is more complex than assessing a project's direct impacts against clearly defined regulatory protections (e.g. protected species). However, this does not mean that their assessment should be side-lined; with the 2017 EIA Regulations clarifying that the likely significant effects of a development proposal on human health must be assessed.

²³ Barton H, Grant M. A health map for the local human habitat. The Journal of the Royal Society for the Promotion of Health 2006; 126(6): 252-3.

We accept that the relevance of these topics and associated impacts will vary depending on the nature of the proposed development and in order to assist applicants PHE has focused its approach on scoping determinants of health and wellbeing under four themes, which have been derived from an analysis of the wider determinants of health mentioned in the National Policy Statements. PHE has developed a list of 21 determinants of health and wellbeing under four broad themes, which have been derived from an analysis of the wider determinants of health mentioned in the National Policy Statements (NPS). If the applicant proposes to scope any areas out of the assessment, they should provide clear reasoning and justification.

The four themes are:

- Access
- Traffic and Transport
- Socioeconomic
- Land Use

Methodology

PHE will expect assessments to set out the methodology used to assess each determinant included in the scope of the assessment. In some instances, the methodologies described may be established and refer to existing standards and/or guidance. In other instances, there may be no pre-defined methodology, which can often be the case for the wider determinants of health; as such there should be an application of a logical impact assessment method that:

- identifies effected populations vulnerable to impacts from the relevant determinant
- establishes the current baseline situation
- identifies the NSIP's potential direct and indirect impacts on each population
- if impacts are identified, evaluates whether the potential impact is significant in relation to the affected population
- identifies appropriate mitigation to minimise impacts or the subsequent effects on health
- identifies opportunities to achieve benefits from the scheme
- identifies appropriate monitoring programmes

Currently there is no standard methodology for assessing the population and human health effects of infrastructure projects, but a number of guides exist, including:

- Institute of Environmental Management and Assessment, 2017: Health in Environmental Assessment, a primer for a proportionate approach;
- NHS London Healthy Urban Development Unit (HUDU), 2015. Healthy Urban Planning Checklist and Rapid Health Impact Assessment Tool;
- Wales Health Impact Assessment Unit, 2012: HIA a practical guide;
- National Mental Wellbeing Impact Assessment Development Unit 2011: Mental Wellbeing Impact Assessment Toolkit;

Determining significant effects

Neither the EIA regulations nor the National Policy Statements provide a definition of what constitutes a 'significant' effect, and so PHE have derived a list of factors which it will take into consideration in the assessment of significance of effects, as outlined below. this list of factors should be read in conjunction with guidance from the above guides.

1. Sensitivity:

Is the population exposed to the NSIP at particular risk from effects on this determinant due to pre-existing vulnerabilities or inequalities (for example, are there high numbers in the local population of people who are young, older, with disabilities or long-term conditions, or on a low income)? Will the NSIP widen existing inequalities or introduce new inequalities in relation to this determinant?

2. Magnitude:

How likely is the impact on this determinant to occur? If likely, will the impact affect a large number of people / Will the impact affect a large geographic extent? Will the effects be frequent or continuous? Will the effects be temporary or permanent and irreversible?

3. Cumulative effects:

Will the NSIP's impacts on this determinant combine with effects from other existing or proposed NSIPs or large-scale developments in the area, resulting in an overall cumulative effect different to that of the project alone?

What are the cumulative effects of the impacts of the scheme on communities or populations? Individual impacts individually may not be significant but in combination may produce an overall significant effect.

4. Importance:

Is there evidence for the NSIP's effect on this determinant on health? Is the impact on this determinant important in the context of national, regional or local policy?

5. Acceptability:

What is the local community's level of acceptance of the NSIP in relation to this determinant? Do the local community have confidence that the applicants will promote positive health impacts and mitigate against negative health effects?

6. Opportunity for mitigation:

If this determinant is included in the scope for the EIA is there an opportunity to enhance any positive health impacts and/or mitigate any negative health impacts?

Scoping

The scoping report may determine that some of the wider determinants considered under human and population health can be scoped out of the EIA. If that, should be the case, detailed rationale and supporting evidence for any such exclusions must be provided. PHE will expect an assessment to have considered all of the determinants listed in Table 1 of Appendix 1 as a minimum.

Vulnerable groups

Certain parts of the population may experience disproportionate negative health effects as a result of a development. Vulnerable populations can be identified through research literature, local population health data or from the identification of pre-existing health conditions that increase vulnerability.

The on health and wellbeing and health inequalities of the scheme will have particular effect on vulnerable or disadvantaged populations, including those that fall within the list of protected characteristics. Some protected groups are more likely to have elevated vulnerability associated with social and economic disadvantages. Consideration should be given to language or lifestyles that influence how certain populations are affected by impacts of the proposal, for example non-English speakers may face barriers to accessing information about the works or expressing their concerns.

Equality Impact Assessments (EqIA) are used to identify disproportionate effects on Protected Groups (defined by the Equality Act, 2010), including health effects. The assessments and findings of the Environmental Statement and the EqIA should be cross-referenced between the two documents, particularly to ensure the assessment of potential impacts for health and inequalities and that resulting mitigation measures are mutually supportive.

The Wales Health Impact Assessment Support Unit (WHIASU), provides a suggested list of vulnerable groups

Age related groups

- Children and young people
- Older people

Income related groups

- People on low income
- Economically inactive
- Unemployed/workless
- People who are unable to work due to ill health

Groups who suffer discrimination or other social disadvantages

- People with physical or learning disabilities/difficulties
- Refugee groups
- People seeking asylum
- Travellers
- Single parent families
- Lesbian and gay and transgender people
- Black and minority ethnic groups
- Religious groups

Geographical groups

- People living in areas known to exhibit poor economic and/or health indicators
- People living in isolated/over-populated areas
- People unable to access services and facilities

Mental health

PHE supports the use of the broad definition of health proposed by the World Health Organisation (WHO). Mental well-being is fundamental to achieving a healthy, resilient and thriving population. It underpins healthy lifestyles, physical health, educational attainment, employment and productivity, relationships, community safety and cohesion and quality of life. NSIP schemes can be of such scale and nature that will impact on the over-arching protective factors, which are:

- Enhancing control
- Increasing resilience and community assets
- Facilitating participation and promoting inclusion.

There should be parity between mental and physical health, and any assessment of health impact should include the appreciation of both. A systematic approach to the assessment of the impacts on mental health, including suicide, is required. The **Mental Well-being Impact Assessment (MWIA)** could be used as a methodology. The assessment should identify vulnerable populations and provide clear mitigation strategies that are adequately linked to any local services or assets

Perceptions about the proposed scheme may increase the risk of anxiety or health effects by perceived effects. “Estimation of community anxiety and stress should be included as part of every risk or impact assessment of proposed plans that involve a potential environmental hazard.

Evidence base and baseline data

An assessment should be evidence based, using published literature to identify determinants and likely health effects. The strength of evidence identifying health effects can vary, but where the evidence for an association is weak it should not automatically be discounted.

There will be a range of publicly available health data including:

- National datasets such as those from the Office of National Statistics,
- Public Health England (PHE), including the fingertips data sets,
- Non-governmental organisations,
- Local public health reports, such as the Joint Strategic Needs Assessment, Health and Wellbeing Strategies;
- Consultation with local authorities, including local authority public health teams;
- Information received through public consultations

Mitigation

If the assessment has identified that significant negative effects are likely to occur with respect to the wider determinants of health, the assessment should include a description of planned mitigation measures the applicant will implement to avoid or prevent effects on the population.

Mitigation and/or monitoring proposals should be logical, feasible and have a clear governance and accountability framework indicating who will be responsible for implementation and how this will be secured during the construction and/or operation of the NSIP.

Positive benefits from the scheme

The scale of many NSIP developments will generate the potential for positive impacts on health and wellbeing; however, delivering such positive health outcomes often requires specific enabling or enhancement measures. For example, the construction of a new road network to access an NSIP site may provide an opportunity to improve the active transport infrastructure for the local community. PHE expects developments to consider and report on the opportunity and feasibility of positive impacts. These may be stand alone or be considered as part of the mitigation measures.

Monitoring

PHE expects an assessment to include consideration of the need for monitoring. It may be appropriate to undertake monitoring where:

- Critical assumptions have been made
- There is uncertainty about whether negative impacts are likely to occur as it may be appropriate to include planned monitoring measures to track whether impacts do occur.
- There is uncertainty about the potential success of mitigation measures
- It is necessary to track the nature of the impact and provide useful and timely feedback that would allow action to be taken should negative impacts occur

How to contact PHE

If you wish to contact us regarding an existing or potential NSIP application, please email: nsipconsultations@phe.gov.uk

Appendix 1
Table 1 – Wider determinants of health and wellbeing

Health and wellbeing themes			
Access	Traffic and Transport	Socioeconomic	Land Use
Wider determinants of health and wellbeing			
<p>Access to :</p> <ul style="list-style-type: none"> • local public and key services and facilities. • Good quality affordable housing. • Healthy affordable food. • The natural environment. • The natural environment within the urban environment. • Leisure, recreation and physical activities within the urban and natural environments. 	<ul style="list-style-type: none"> • Accessibility. • Access to/by public transport. • Opportunities for access by cycling and walking. • Links between communities. • Community severance. • Connections to jobs. • Connections to services, facilities and leisure opportunities. 	<ul style="list-style-type: none"> • Employment opportunities, including training opportunities. • Local business activity. • Regeneration. • Tourism and leisure industries. • Community/social cohesions and access to social networks. • Community engagement. 	<ul style="list-style-type: none"> • Land use in urban and/or /rural settings. • Quality of Urban and natural environments

1) **Access**

a. **Access to local, public and key services and facilities**

Access to local facilities can increase mobility and social participation. Body mass index is significantly associated with access to facilities, including factors such as the mix and density of facilities in the area. The distance to facilities has no or only a small effect on walking and other physical activities. Access to recreational facilities can increase physical activity, especially walking for recreation, reduce body weight, reduce the risk of high blood pressure, and reduce the number of vehicle trips, the distances travelled and greenhouse gas emissions.

Local services include health and social care, education, employment, and leisure and recreation. Local facilities include community centres, shops, banks/credit unions and Post Offices. Services and facilities can be operated by the public, private and/or voluntary sectors. Access to services and facilities is important to both physical and mental health and wellbeing. Access is affected by factors such as availability, proximity to people's place of residence, existence of transport services or active

travel infrastructure to the location of services and facilities, and the quality of services and facilities.

The construction or operation of an NSIP can affect access adversely: it may increase demand and therefore reduce availability for the existing community; during construction, physical accessibility may be reduced due to increased traffic and/or the blockage of or changes to certain travel routes. It is also possible that some local services and facilities are lost due to the land-take needed for the NSIP.

Conversely if new routes are built or new services or facilities provided the NSIP may increase access. NSIPs relating to utilities such as energy and water can maintain, secure or increase access to those utilities, and thereby support health and wellbeing.

b. Access to good-quality affordable housing

Housing refurbishment can lead to an improvement in general health and reduce health inequalities. Housing improvements may also benefit mental health. The provision of diverse forms and types of housing is associated with increased physical activity. The provision of affordable housing is strongly associated with improved safety perceptions in the neighbourhood, particularly among people from low-income groups. For vulnerable groups, the provision of affordable housing can lead to improvements in social, behavioural and health related outcomes. For some people with long term conditions, the provision of secure and affordable housing can increase engagement with healthcare services, which can lead to improved health-related outcomes. The provision of secure and affordable housing can also reduce engagement in risky health-related behaviours. For people who are homeless, the provision of affordable housing increases engagement with healthcare services, improves quality of life and increases employment, and contributes to improving mental health.

Access to housing meets a basic human need, although housing of itself is not necessarily sufficient to support health and wellbeing: it is also important that the housing is of good quality and affordable. Factors affecting the quality of housing include energy efficiency (e.g. effective heating, insulation), sanitation and hygiene (e.g. toilet and bathroom), indoor air quality including ventilation and the presence of damp and/or mould, resilience to climate change, and overcrowding. The affordability of housing is important because for many people, especially people on a low income, housing will be the largest monthly expense; if the cost of housing is high, people may not be able to meet other needs such as the need for heating in winter or food. Some proposals for NSIPs include the provision of housing, which could be beneficial for the health and wellbeing of the local population. It is also possible that some housing will be subject to a compulsory purchase order due to the land-take needed for an NSIP.

c. Access to affordable healthy food

Access to healthy food is related to the provision of public and active transport infrastructure and the location and proximity of outlets selling healthier food such as fruit and vegetables. For the general population, increased access to healthy, affordable food through a variety of outlets (shops, supermarkets, farmers' markets and community gardens) is associated with improved dietary behaviours, including attitudes towards healthy eating and food purchasing behaviour, and improved adult weight. Increased access to unhealthier food retail outlets is associated with increased weight in the general population and increased obesity and unhealthy eating behaviours among children living in low-income areas. Urban agriculture can improve attitudes towards healthier food and increase fruit and vegetable consumption.

Factors affecting access to healthy affordable food include whether it is readily available from local shops, supermarkets, markets or delivery schemes and/or there

are opportunities to grow food in local allotments or community gardens. People in environments where there is a high proportion of fast food outlets may not have easy access to healthy affordable food.

d. Access to the natural environment

Availability of and access to safe open green space is associated with increased physical activity across a variety of behaviours, social connectedness, childhood development, reduced risk of overweight and obesity and improved physical and mental health outcomes. While the quantity of green space in a neighbourhood helps to promote physical activity and is beneficial to physical health, e.g. lower rates of mortality from cardiovascular disease and respiratory disease in men, the availability of green environments is likely to contribute more to mental health than to physical health: the prevalence of some disease clusters, particularly anxiety and depression, is lower in living environments which have more green space within a 1-km radius.

The proximity, size, type, quality, distribution, density and context of green space are also important factors. Quality of green space may be a better predictor of health than quantity, and any type of green space in a neighbourhood does not necessarily act as a venue for, or will encourage, physical activity. 'Walkable' green environments are important for better health, and streetscape greenery is as strongly related to self-reported health as green areas. Residents in deprived areas are more likely to perceive access to green space as difficult, to report poorer safety, to visit the green space less frequently and to have lower levels of physical activity. The benefits to health and wellbeing of blue space include lower psychological distress.

The natural environment includes the landscape, waterscape and seascape. Factors affecting access include the proximity of the natural environment to people's place of residence, the existence of public transport services or active travel infrastructure to the natural environment, the quality of the natural environment and feelings of safety in the natural environment. The construction of an NSIP may be an opportunity to provide green and/or blue infrastructure in the local area. It is also possible that green or blue infrastructure will be lost due to the land-take needed for the NSIP.

e. Access to the natural environment within the urban environment

Public open spaces are key elements of the built environment. Ecosystem services through the provision of green infrastructure are as important as other types of urban infrastructure, supporting physical, psychological and social health, although the quality and accessibility of green space affects its use, C19, ethnicity and perceptions of safety. Safe parks may be particularly important for promoting physical activity among urban adolescents. Proximity to urban green space and an increased proportion of green space are associated with decreased treatment of anxiety/mood disorders, the benefits deriving from both participation in usable green space near to home and observable green space in the neighbourhood. Urban agriculture may increase opportunities for physical activity and social connections.

A view of 'greenery' or of the sea moderates the annoyance response to noise. Water is associated with positive perceptual experiences in urban environments, with benefits for health such as enhanced contemplation, emotional bonding, participation and physical activity. Increasing biodiversity in urban environments, however, may promote the introduction of vector or host organisms for infectious pathogens, eg green connectivity may potentiate the role of rats and ticks in the spread of disease, and bodies of water may provide habitats for mosquitoes. Owing to economic growth, population size and urban and industrial expansion in the EU, to maintain ecosystem services at 2010 levels, for every additional percentage increase in the proportion of 'artificial' land, there needs to be a 2.2% increase in green infrastructure.

The natural environment within the urban environment includes the provision of green

space and blue space in towns and cities. Factors involved in access include the proximity of the green and/or blue space to people's place of residence, the existence of transport services or active travel infrastructure to the green and/or blue space, the quality of the green and/or blue space and feelings of safety when using the green and/or blue space. The construction of an NSIP may be an opportunity to provide green and/or blue infrastructure in the local urban environment. It is also possible that green or blue infrastructure in the urban environment will be lost due to the land-take needed for the NSIP.

- f. Access to leisure, recreation and physical activity opportunities within the urban and natural environments.

Access to recreational opportunities, facilities and services is associated with risk factors for long-term disease; it can increase physical activity, especially walking for recreation, reduce body mass index and overweight and obesity, reduce the risk of high blood pressure, and reduce the number of vehicle trips, the distances travelled and greenhouse gas emissions. It can also enhance social connectedness. Children tend to play on light-traffic streets, whereas outdoor activities are less common on high-traffic streets. A perception of air pollution can be a barrier to participating in outdoor physical activity. There is a positive association between urban agriculture and increased opportunities for physical activity and social connectivity. Gardening in an allotment setting can result in many positive physical and mental health-related outcomes. Exercising in the natural environment can have a positive effect on mental wellbeing when compared with exercising indoors.

Leisure and recreation opportunities include opportunities that are both formal, such as belonging to a sports club, and informal, such as walking in the local park or wood. Physical activity opportunities include routine activity as part of daily life, such as walking or cycling to work, and activity as part of leisure or recreation, such as playing football. The construction of an NSIP may enhance the opportunities available for leisure and recreation and physical activity through the provision of new or improved travel routes, community infrastructure and/or green or blue space. Conversely, construction may reduce access through the disruption of travel routes to leisure, recreation and physical activity opportunities.

2) **Traffic and Transport**

- a. Accessibility

Walkability, regional accessibility, pavements and bike facilities are positively associated with physical activity and negatively related to body weight and high blood pressure, and reduce the number of vehicle trips, the distances travelled and greenhouse gas emissions. Body mass index is associated with street network accessibility and slope variability.

Accessibility in relation to transport and travel has several aspects including whether potential users can gain physical access to the infrastructure and access to the services the infrastructure provides. The design and operation of transport infrastructure and the associated services should take account of the travel needs of all potential users including people with limited mobility. People whose specific needs should be considered include pregnant women, older people, children and young people and people with a disability. Other aspects of transport infrastructure affecting accessibility include safety and affordability, both of which will affect people's ability to travel to places of employment and/or key local services and facilities and/or access their social networks.

- b. Access to / by public transport

Provision of high-quality public transport is associated with higher levels of active

travel among children and among people commuting to work, with a decrease in the use of private cars. Combining public transport with other forms of active travel can improve cardiovascular fitness. Innovative or new public transport interventions may need to be marketed and promoted differently to different groups of transport users, eg by emphasising novelty to car users while ensuring that the new system is seen by existing users as coherently integrated with existing services.

Transport facilitates access to other services, facilities and amenities important to health and wellbeing. Public transport is any transport open to members of the public including bus, rail and taxi services operated by the public, private or community sectors. For people who do not have access to private transport, access to public transport is important as the main agency of travel especially for journeys >1 mile. Access to public transport is not sufficient, however, and access by public transport needs to be taken into account: public transport services should link places where people live with the destinations they need or want to visit such as places of employment, education and healthcare, shops, banks and leisure facilities. Other aspects of access to public transport include affordability, safety, frequency and reliability of services.

c. Opportunities for / access by cycling & walking

Walking and cycling infrastructure can enhance street connectivity, helping to reduce perceptions of long-distance trips and providing alternative routes for active travel. Prioritising pedestrians and cyclists through changes in physical infrastructure can have positive behavioural and health outcomes, such as physical activity, mobility and cardiovascular outcomes. The provision and proximity of active transport infrastructure is also related to other long-term disease risk factors, such as access to healthy food, social connectedness and air quality. The perception of air pollution, however, appears to be a barrier to participating in active travel.

Perceived or objective danger may also have an adverse effect on cycling and walking, both of which activities decrease with increasing traffic volume and speed, and cycling for leisure decreases as local traffic density increases. Health gains from active travel policies outweigh the adverse effects of road traffic incidents. New infrastructure to promote cycling, walking and the use of public transport can increase the time spent cycling on the commute to work, and the overall time spent commuting among the least-active people. Active travel to work or school can be associated with body mass index and weight and may reduce cardiovascular risk factors and improve cardiovascular outcomes. The distance of services from cycle paths can have an adverse effect on cycling behaviour, whereas mixed land use, higher densities and reduced distances to non-residential destinations promote transportation walking.

d. Links between communities

Social connectedness can be enhanced by the provision of public and active transport infrastructure and the location of employment, amenities, facilities and services.

e. Community severance

In neighbourhoods with high volumes of traffic, the likelihood of people knowing and trusting neighbours is reduced.

f. Connections to jobs

The location of employment opportunities and the provision of public and active transportation infrastructure are associated with risk factors for long-term disease such as physical activity. Good pedestrian and cycling infrastructure can promote commuting physical activity. Improved transport infrastructure has the potential to shift the population distribution of physical activity in relation to commuting, although a prerequisite may be a supportive social environment. Mixed land use, higher densities and reduced distances to non-residential destinations promote transportation walking.

The ease of access to employment, shops and services including the provision of public and active transport are important considerations and schemes should take any opportunity to improve infrastructure to promote cycling, walking and the use of public transport

- g. Connections to services, facilities and leisure opportunities
Mixed land use, higher densities and reduced distances to non-residential destinations promote transportation walking. Access to recreational opportunities and the location of shops and services are associated with risk factors for long-term disease such as physical activity, access to healthy food and social connectedness. Increased distance of services from cycle paths can have an adverse effect on cycling behaviour.

3) **Socio Economic**

- a. Employment opportunities including training opportunities
Employment is generally good for physical and mental health and well-being, and worklessness is associated with poorer physical and mental health and well-being. Work can be therapeutic and can reverse the adverse health effects of unemployment for healthy people of working age, many disabled people, most people with common health problems and social security beneficiaries. Account must be taken of the nature and quality of work and its social context and jobs should be safe and accommodating. Overall, the beneficial effects of work outweigh the risks of work and are greater than the harmful effects of long-term unemployment or prolonged sickness absence. Employment has a protective effect on depression and general mental health.

Transitions from unemployment to paid employment can reduce the risk of distress and improve mental health, whereas transitions into unemployment are psychologically distressing and detrimental to mental health. The mental health benefits of becoming employed are also dependent on the psychosocial quality of the job, including level of control, demands, complexity, job insecurity and level of pay: transition from unemployment to a high-quality job is good for mental health, whereas transition from unemployment to a low-quality job is worse for mental health than being unemployed. For people receiving social benefits, entry into paid employment can improve quality of life and self-rated health (physical, mental, social) within a short timeframe. For people receiving disability benefits, transition into employment can improve mental and physical health. For people with mental health needs, entry into employment reduces the use of mental health services.

For vocational rehabilitation of people with severe mental illness (SMI), Supported Employment is more effective than Pre-vocational Training in helping clients obtain competitive employment; moreover, clients in Supported Employment earn more and work more hours per month than those in Pre-vocational Training.

- b. Local Business Activity
It is important to demonstrate how a proposed development will contribute to ensuring the vitality of town centres. Schemes should consider the impact on local employment, promote beneficial competition within and between town centres, and create attractive, diverse places where people want to live, visit and work

In rural areas the applicant should assess the impact of the proposals on a prosperous rural economy, demonstrate how they will support the sustainable growth and expansion of all types of business and enterprise in rural areas, promoting the development and diversification of agricultural and other land based rural businesses.

- c. **Regeneration**
Following rebuilding and housing improvements in deprived neighbourhoods, better housing conditions are associated with better health behaviours; allowing people to remain in their neighbourhood during demolition and rebuilding is more likely to stimulate life-changing improvements in health behaviour than in people who are relocated. The partial demolition of neighbourhoods does not appear to affect residents' physical or mental health. Mega-events, such as the Olympic Games, often promoted on the basis of their potential legacy for regeneration, appear to have only a short-term impact on mental health.
- d. **Tourism and Leisure Industries**
The applicant should assess the impact of the proposed development on retail, leisure, commercial, office, tourism, cultural, community and residential development needed in town centres. In rural locations assessment and evaluation of potential impacts on sustainable rural tourism and leisure developments that benefit businesses in rural areas, communities and visitors should be undertaken.
- e. **Community / social cohesion and access to social networks**
The location of employment, shops and services, provision of public and active transport infrastructure and access to open space and recreational opportunities are associated with social connectedness. Access to local amenities can increase social participation. Neighbourhoods that are more walkable can increase social capital. Urban agriculture can increase opportunities for social connectivity. Infrastructure developments, however, can affect the quality of life of communities living in the vicinity, mediated by substantial community change, including feelings of threat and anxiety, which can lead to psychosocial stress and intra-community conflict.
- f. **Community engagement**
Public participation can improve environmental impact assessments, thereby increasing the total welfare of different interest groups in the community. Infrastructure development may be more acceptable to communities if it involves substantial public participation.

4) **Land Use**

- a. **Land use in urban and / or rural settings**

Land-use mix including infrastructure:

Land use affects health not only by shaping the built environment, but also through the balance of various types of infrastructure including transport. Vulnerable groups in the population are disproportionately affected by decisions about land use, transport and the built environment. Land use and transport policies can result in negative health impacts due to low physical activity levels, sedentary behaviours, road traffic incidents, social isolation, air pollution, noise and heat. Mixed land use can increase both active travel and physical activity. Transportation walking is related to land-use mix, density and distance to non-residential destinations; recreational walking is related to density and mixed use. Using modelling, if land-use density and diversity are increased, there is a shift from motorised transport to cycling, walking and the use of public transport with consequent health gain from a reduction in long-term conditions including diabetes, cardiovascular disease and respiratory disease.

Proximity to infrastructure:

Energy resource activities relating to oil, gas and coal production and nuclear power can have a range of negative effects on children and young people. Residing in proximity to motorway infrastructure can reduce physical activity. For residents in proximity to rail infrastructure, annoyance is mediated by concern about damage to their property and future levels of vibration. Rural communities have concerns about

competing with unconventional gas mining for land and water for both the local population and their livestock."

b. Quality of urban and natural environments

Long-term conditions such as cardiovascular disease, diabetes, obesity, asthma and depression can be moderated by the built environment. People in neighbourhoods characterised by high 'walkability' walk more than people in neighbourhoods with low 'walkability' irrespective of the land-use mix. In neighbourhoods associated with high 'walkability' there is an increase in physical activity and social capital, a reduction in overweight and blood pressure, and fewer reports of depression and of alcohol abuse. The presence of walkable land uses, rather than their equal mixture, relates to a healthy weight. Transportation walking is at its highest levels in neighbourhoods where the land-use mix includes residential, retail, office, health, welfare and community, and entertainment, culture and recreation land uses; recreational walking is at its highest levels when the land-use mix includes public open space, sporting infrastructure and primary and rural land uses. Reduced levels of pollution and street connectivity increase participation in physical activity.

Good-quality street lighting and traffic calming can increase pedestrian activity, while traffic calming reduces the risk of pedestrian injury. 20-mph zones and limits are effective at reducing the incidence of road traffic incidents and injuries, while good-quality street lighting may prevent them. Public open spaces within neighbourhoods encourage physical activity, although the physical activity is dependent on different aspects of open space, such as proximity, size and quality. Improving the quality of urban green spaces and parks can increase visitation and physical activity levels.

Living in a neighbourhood overlooking public areas can improve mental health, and residential greenness can reduce the risk of cardiovascular mortality. Crime and safety issues in a neighbourhood affect both health status and mental health. Despite the complexity of the relationship, the presence of green space has a positive effect on crime, and general environmental improvements may reduce the fear of crime. Trees can have a cooling effect on the environment – an urban park is cooler than a non-green site. Linking road infrastructure planning and green infrastructure planning can produce improved outcomes for both, including meeting local communities' landscape sustainability objectives.

East Northants Resource Management Facility – proposed development by Augean South Limited

Royal Mail Group Limited comments on information to be provided in the applicant's Environmental Statement

Introduction

Reference the letter from PINS to Royal Mail dated 2 July 2020 requesting Royal Mail's comments on information that should be provided in Augean South Limited Environmental Statement.

Royal Mail's consultants BNP Paribas Real Estate have reviewed the applicant's Scoping Report dated July 2020.

Statutory and operational information about Royal Mail

Under section 35 of the Postal Services Act 2011 (the "Act"), Royal Mail has been designated by Ofcom as a provider of the Universal Postal Service. Royal Mail is the only such provider in the United Kingdom.

The Act provides that Ofcom's primary regulatory duty is to secure the provision of the Universal Postal Service. Ofcom discharges this duty by imposing regulatory conditions on Royal Mail, requiring it to provide the Universal Postal Service.

The Act includes a set of minimum standards for Universal Service Providers, which Ofcom must secure. The conditions imposed by Ofcom reflect those standards.

Royal Mail is under some of the highest specification performance obligations for quality of service in Europe. Its performance of the Universal Service Provider obligations is in the public interest and this should not be affected detrimentally by any statutorily authorised project.

By sections, 30 and 31 of the Act (read with sections 32 and 33) there is a set of minimum standards for Universal Service Providers, which Ofcom must secure. The conditions imposed by Ofcom reflect those standards. There is, in effect, a statutory obligation on Royal Mail to provide at least one collection from letterboxes and post offices six days a week and one delivery of letters to all 29 million homes and businesses in the UK six days a week (five days a week for parcels). Royal Mail must also provide a range of "end to end" services meeting users' needs, e.g. First Class, Second Class, Special Delivery by 1 pm, International and Redirections services.

The Government imposes financial penalties on Royal Mail if its Universal Service Obligation service delivery targets are not met. These penalties relate to time targets for:

- collections,
- clearance through plant, and
- delivery.

Royal Mail's postal sorting and delivery operations rely heavily on road communications. Royal Mail's ability to provide efficient mail collection, sorting and delivery to the public is sensitive to changes in the capacity of the highway network.

Royal Mail is a major road user nationally. Disruption to the highway network and traffic delays can have direct consequences on Royal Mail's operations, its ability to meet the Universal Service Obligation and comply with the regulatory regime for postal services thereby presenting a significant risk to Royal Mail's business.

Royal Mail has two properties in the search area and a further two within 10 miles:

BE	Business Entry Name	Address	Distance (miles)
3697	Peterborough HUB/OFF	Unit 5 Haddenbrook Business Centre, PE2 6YX	10.9
3527	Orton Southgate DO	Newcombe Way, PE2 6BZ	11.3
3405	Peterborough VOC	Site 5 Darlows, PE1 5XB	14.1
4314	Peterborough CHR	Peter Brotherhood, 85 Papyrus Road, PE4 5HG	14.6
1683	Peterborough MC/VSC/MED/DO/MQC	Papyrus Road, PE4 5PE	14.7

Please find at Appendix 1 the sites plotted on a map for reference.

Royal Mail's comments on information that should be provided in Augean South Limited Environmental Statement

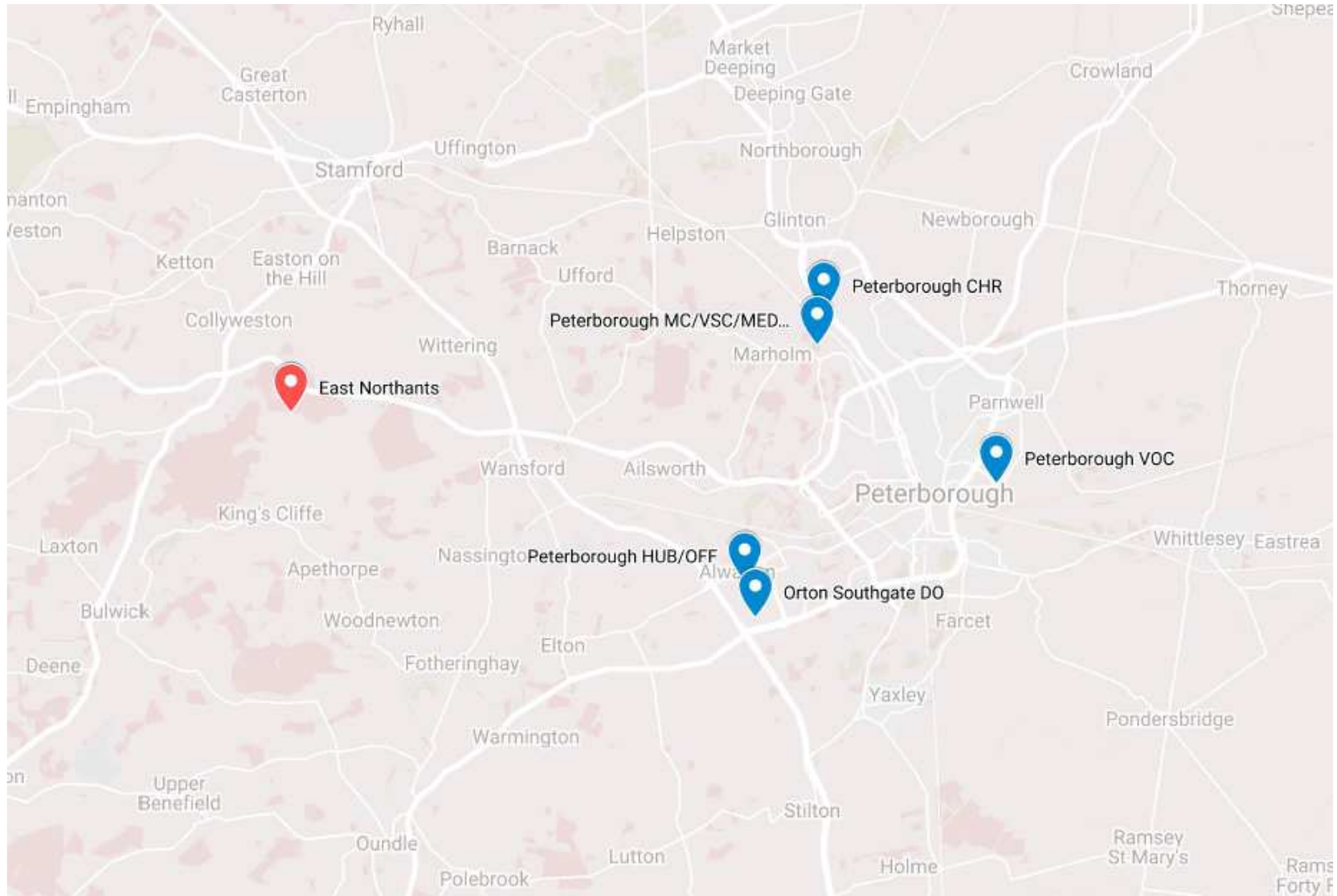
Within the Environmental Statement there is no information regarding construction traffic routes and management for the Scheme. Royal Mail has the following comments / requests:

1. Royal Mail requests that the Traffic and Transportation section of the ES includes information on the needs of major road users (such as Royal Mail) and acknowledges the requirement to ensure that major road users are not disrupted through full consultation at the appropriate time in the DCO and development process.
2. Royal Mail requests that it be fully pre-consulted by the applicant and its contractors on any proposed road closures / diversions / alternative access arrangements, hours of working and the content of any Construction Traffic Management Plan. The ES should acknowledge the need for this consultation with Royal Mail and other relevant local businesses / occupiers.

Royal Mail is able to supply the applicant with information on its road usage / trips if required.

Should PINS or Aegean South Limited have any queries in relation to the above then in the first instance please contact Denise Stephenson (denise.stephenson@royalmail.com) of Royal Mail's Legal Services Team or Alice Stephens (alice.stephens@realestate.bnpparibas) of BNP Paribas Real Estate.

Appendix 1



From: [REDACTED]
To: [East Northants Resource Management Facility Western Extension](#)
Subject: WS010005_000008_200702 - Scoping Opinion
Date: 25 July 2020 09:13:16
Attachments: [image001.png](#)

Dear Marie,

South Kesteven District Council have no comments to make regarding this scoping opinion consultation.

Phil Jordan MRTPI
[Principal Planning Officer](#)
Development & Growth
South Kesteven District Council
Council Offices, St. Peter's Hill
Grantham, Lincolnshire, NG31 6PZ
Tel: 01476 406080 ext 6074
Email: [REDACTED]
www.southkesteven.gov.uk

East Midlands Building Consultancy a partnership between South Kesteven DC, Rushcliffe BC and Newark and Sherwood DC.
Committed and motivated to share and provide our expertise for the benefit of all.

LABC represents **Local Authority Building Control** in England and Wales.
By investing in Local Authority Building Control you are investing in a healthy, safe and accessible environment.

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LATE RESPONSES

Ms M Shoemith
The Planning Inspectorate
Major Casework Directorate
Temple Quay House
2 The Square
BRISTOL
BS1 6PN

Telephone: 01536 534316
Email: planning@kettering.gov.uk
Our Ref: KET/2020/0432
Date: 29 July 2020
DNOBS

Dear Sir/Madam

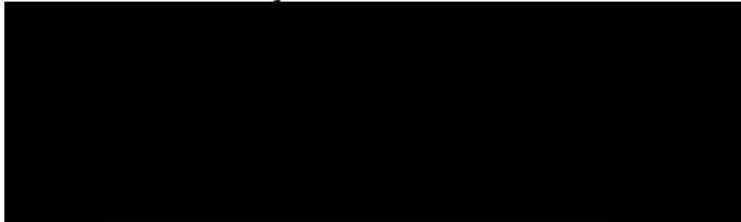
TOWN AND COUNTRY PLANNING ACTS PLANNING ACT 2008

Application No: **KET/2020/0432**
Applicant: **Augean South Limited**
Proposal: **East Northants Resource Management Facility Western
Extension (WS010005_000008_200702 - The Planning
Inspectorate)**
Location: **East Northants Resource Management Facility, Near Kings
Cliffe**
Case Officer: **Christina Riley**

Thank you for consulting this Authority about the above proposal.

This Council raises **No objection** .

Yours faithfully



James Wilson
Interim Head of Development Services

COLLYWESTON PARISH COUNCIL

Monday, 07 September 2020

Our ref: 20/Planning/11

Your ref: WS010005_000008_200702

The Planning Inspectorate
Major Casework Directorate
Temple Quay House
2 The Square
Bristol
BS1 6PN

To Whom It May Concern:

Re: Application by Augean South Limited (the Applicant) for an Order granting Development Consent for the Proposed East Northants Resource Management Facility Western Extension (the Proposed Development)

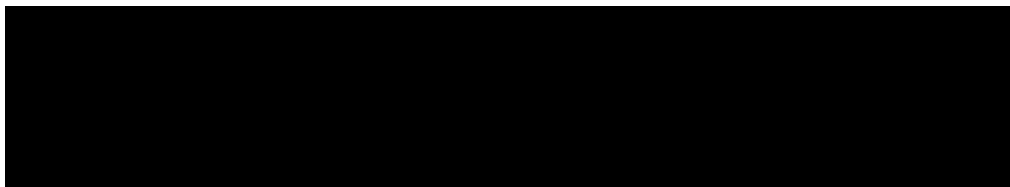
1. Land use

- (a) **NPPF:** The National Planning Policy Framework states: “*The focus of planning policies and decisions should be on whether proposed development is an acceptable use of land...*” The following subheadings require to be included in the Environmental Impact Statement:
- (b) **Surrounding habitats:** The Scoping Report mentions badgers, bats, dormice, newts and toads in the surrounding habitats. The proposed extension would be considerably closer to these habitats, including important local SSSI and woodlands. These surrounding habitats should be protected from any further fragmentation by development.
- (c) **Loss of agricultural land:** The proposal to almost-double the overall footprint of the site will result in the loss to agriculture of 26.3 hectares. In the future it will only become more important to the nation to grow as much food domestically as possible; the fact that any remediation will only address biodiversity but never restore the land to possible food production does not seem to be an “acceptable” outcome.
- (d) **Land to the South West:** It is unclear on what it was decided not to carry out Noise Assessment to the South West of the site. Noise impact may not be anticipated to affect *people* in this area, but it has just the same impact on wildlife here as in all of the surrounding areas.

2. Quantification

- (a) **Capacity implications:** The proposed footprint would expand from 31.2ha to 57.5ha, an increase of more than 80%. The Report anticipates an increase in the rate of waste input and HGV movements, rather than merely continuing the current rate of operations for an additional 20 years. This being so, a capacity

COLLYWESTON PARISH COUNCIL

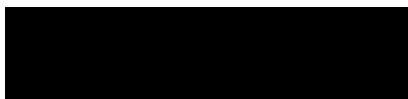


assessment for the road junctions with the A47 would appear essential in terms of public safety and implications for infrastructure and emergency services implications.

(b) Gaseous emissions: There should be none, arising from the Inert Waste and LLW permitted for disposal on site. Assuming that the increased rate of input will mean that a normally-small proportion of gases would grow proportionally, then the quantities should be disclosed and assessed so that future monitoring is meaningful.

- 3. Major accidents:** The definition needs to be broadened beyond those caused on site by natural disasters or climate change. Increased operational activity on an extended site, surrounded by natural habitats, some neighbouring residents and business, served by the A47 and associated feeder routes such as the A1 and A43, mean that any “major accidents” would have potential for major impacts far beyond the operational site itself. This includes road accidents involving HGVs, transporting LLW and other hazardous substances over long distances. Any road diversions cause on-costs for Police, emergency services, and potentially Highways for emergency road repairs. Local residents deserve to know that, should the worst happen, they and the wider public would be safeguarded, and how. The public and local authority purses are very tightly constrained now, and this assessment needs to be made and the findings addressed.

Yours sincerely
Clerk/RFO to the Parish Council



Mrs J. Hemingway