



Viewpoint 10: Single Frame



Viewpoint 10

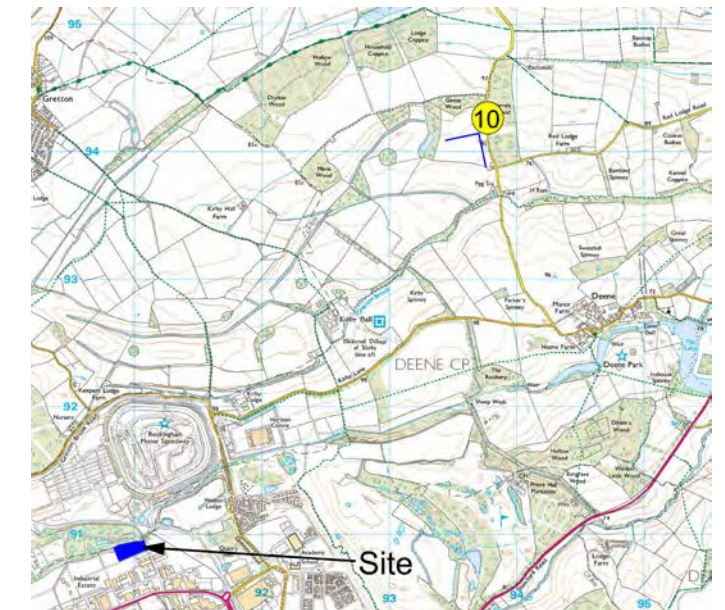
Direction of view: Southwest

Distance to the nearest part of the site: 4.2 km

Elevation: 103 m AOD

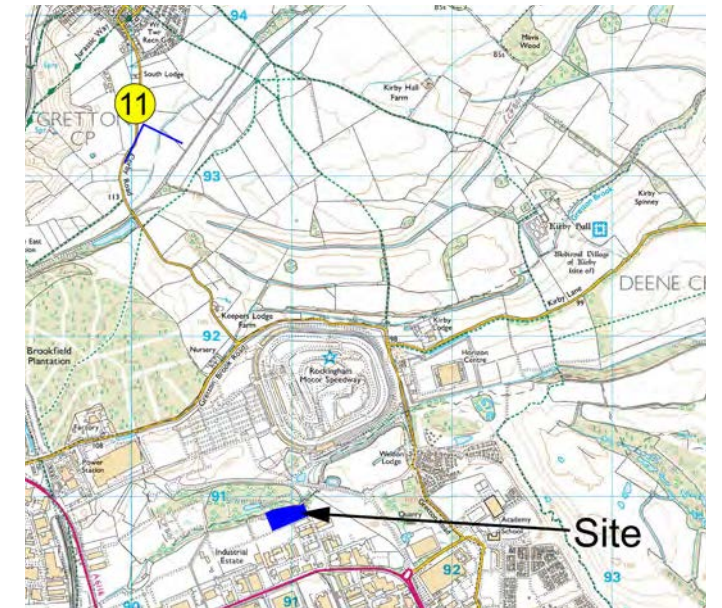
Grid reference: SP 93745 94223

Image taken: 05.01.19





Viewpoint 11
Direction of view: South southeast
Distance to the nearest part of the site: 2.6 km
Elevation: 114 m AOD
Grid reference: SP 90046 93409
Image taken: 05.01.19

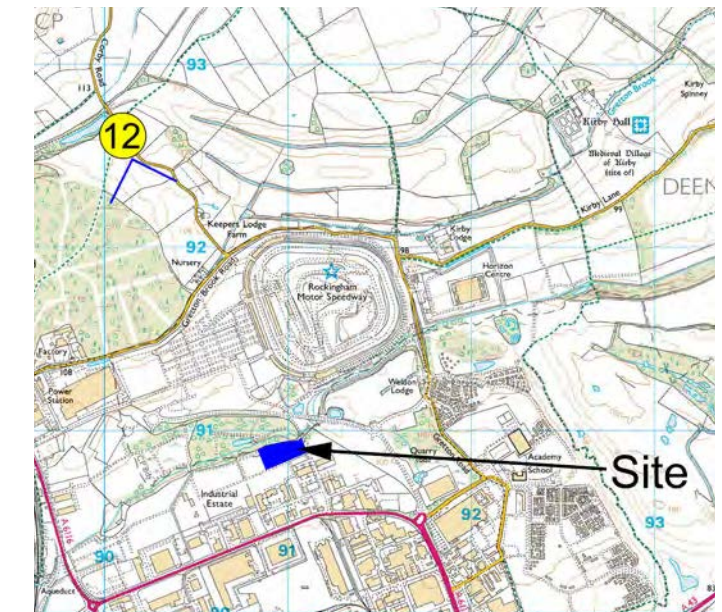




Viewpoint 12: Single Frame



Viewpoint 12
Direction of view: South southeast
Distance to the nearest part of the site: 1.8 km
Elevation: 114 m AOD
Grid reference: SP 90142 92563
Image taken: 05.01.19







Viewpoint 13
Direction of view: West southwest
Distance to the nearest part of the site: 478 m
Elevation: 106 m AOD
Grid reference: SP 91553 91062
Image taken: 05.01.19





Viewpoint 14: Single Frame



Viewpoint 14

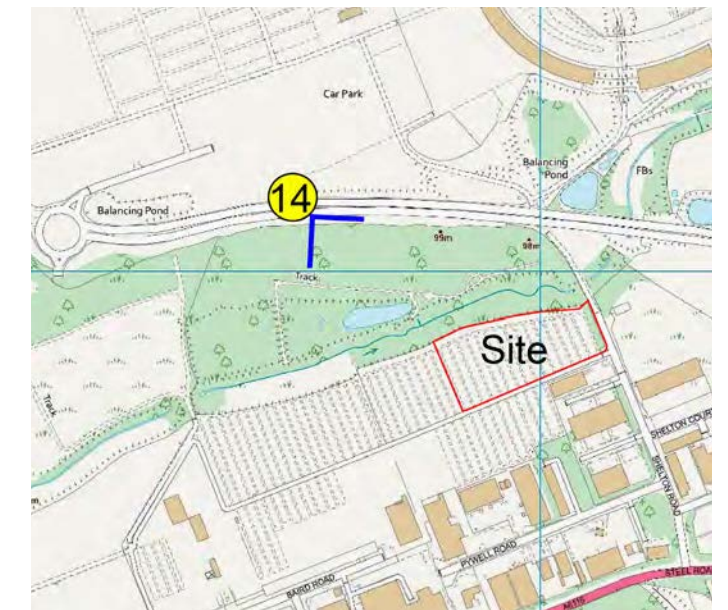
Direction of view: Southeast

Distance to the nearest part of the site: 296 m

Elevation: 111 m AOD

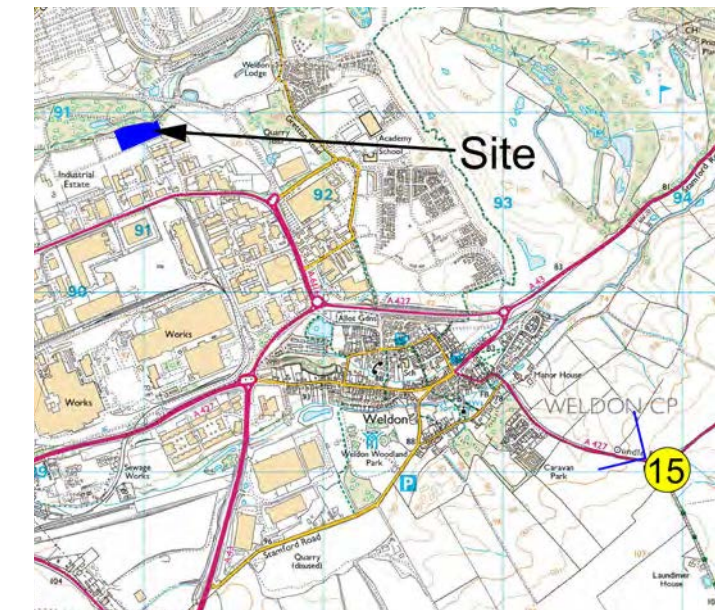
Grid reference: SP 90654 91112

Image taken: 05.01.19

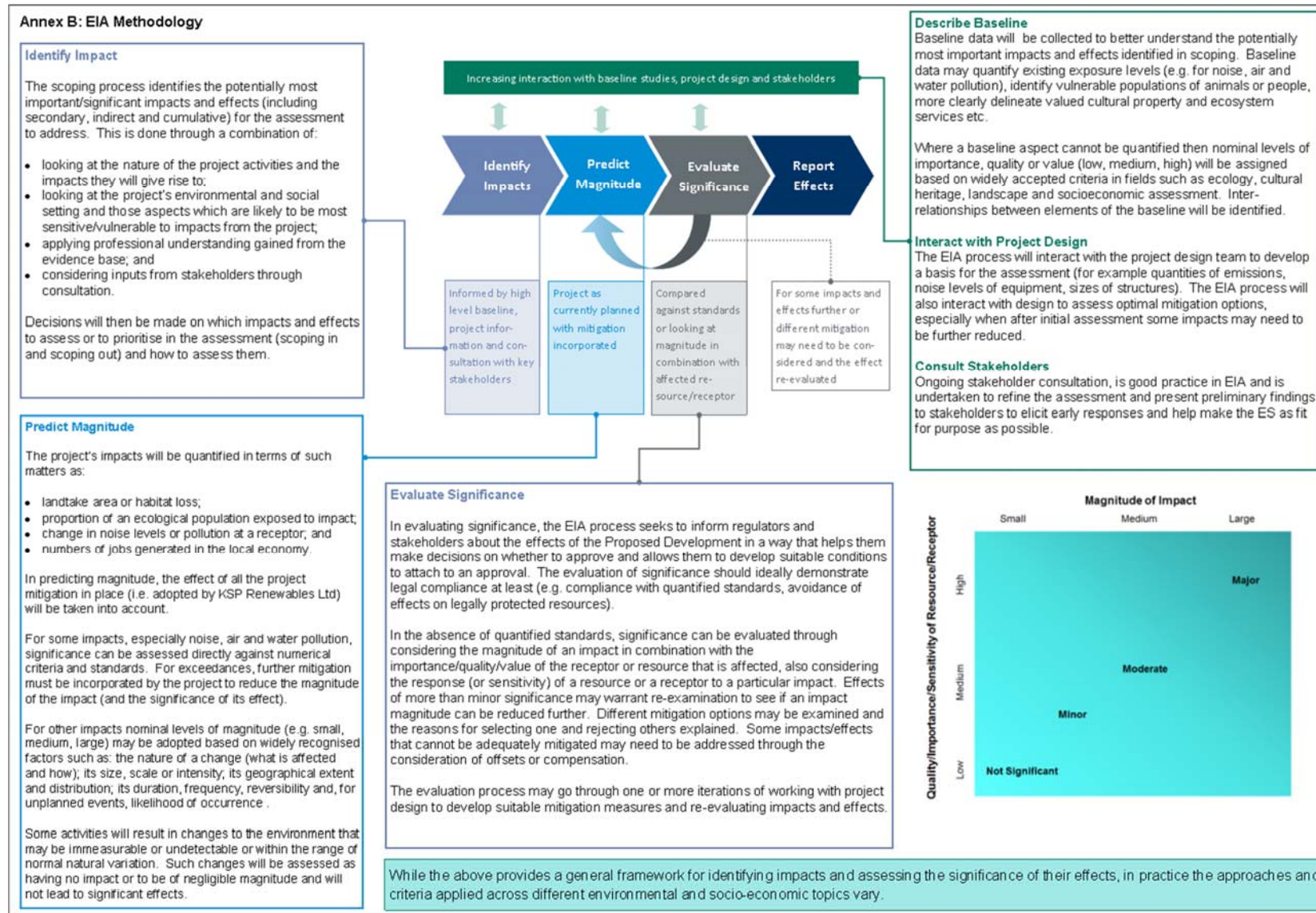




Viewpoint 15
Direction of view: Northwest
Distance to the nearest part of the site: 3.4 km
Elevation: 106 m AOD
Grid reference: SP 93902 88975
Image taken: 05.01.19



APPENDIX B METHOD FOR EIA



APPENDIX C CUMULATIVE SCHEMES

Developments that might have a significant cumulative effect in combination with the Proposed Development have been identified from a review of local authority planning registers, the list of developments included in the 2016 ES and consideration of their status e.g. if they have been built out since 2016 they will now form part of the baseline conditions. The Planning Inspectorate's register of Nationally Significant Infrastructure Projects, register of section 36 planning permissions and other similar sites were also reviewed however no relevant developments were found (all were sufficiently distanced from the site such that there was no potential for significant cumulative effects, or were already under construction and part of the baseline). The list of developments proposed for inclusion in the cumulative assessment is presented below.

Reference	Description	Distance from Site	Status	Comments
ENC - 04/01326/OUT ENC - 16/01237/AMD	Priors Hall Mixed Use Development Kirby Lane Deene Corby Northamptonshire NN17 3EJ Mixed use: Urban extension to Corby, including residential (up to 5,100 units), Employment (up to 14ha, 1 District Centre, 2 neighbourhood centres, Schools (1 Secondary, 3 Primary), Hotel, Formal and Informal Open Space, together with changes to the operating regime at Rockingham Motor Speedway, at Priors Hall Site, Kirkby Lane.	0.75 km E	Application permitted (10/02/2012) Application permitted (12/09/2016)	The development is partway through construction (estimated completion 2031) and will be considered as a cumulative scheme .
NCC - 4/00093/WASVOC CBC – 14/00501/COC	Establishment of a renewable fuel production and recycling facility including various non-material amendments and related applications.	1.5 km NW	Approved (25/03/2015)	Status uncertain and clarification welcomed. Developer's website says "Subject to financing, we are expecting the main construction works to start later this year. It is a two-year build so this modern and efficient facility should be open in 2017".

APPENDIX 3.2 SCOPING RESPONSES



Northamptonshire County Council

memo

To: Phil Watson
From: Lesley-Ann Mather
Ref: 19/00001/SCO
Date: 8th March 2019
cc:

TOWN AND COUNTRY PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT)

REGULATIONS 2017 SCOPING REQUEST CONSULTATION - REGULATION 15 PROPOSED DEVELOPMENT: Scoping Opinion for Proposed Energy Recovery Facility

**LOCATION: Land At, Shelton Road, Willowbrook East Industrial Estate, Corby,
Northamptonshire,**

Phil

Thank you for your consultation.

The application is within an area which has been quarried and as such the archaeological potential has been removed.

I agree that the information provided within the 2016 ES is still valid in relation to below ground archaeological activity. The impact of the proposals on designated assets does however require consideration and I understand that Historic England have provided extensive comments in relation to the proposed development.

Regards

Lesley-Ann Mather
County Archaeological Advisor

Planning Services
One Angel Street
Angel Street
w. www.northamptonshire.gov.uk
t. 01604 367909
e. lmather@northamptonshire.gov.uk



Northamptonshire
County Council

Town and Country Planning Act 1990 (As Amended) Local Highway Authority (LHA) Response

Application Reference	19/00001/SCO		
LHA Reference	19974		
Proposal	Renewable energy station - EIA Scope		
Location	Shelton Rd, Corby		
Date consulted	11.2.19	Date sent	27/02/2019
Case Officer:	Phil Watson - NCC		

Observations:

We will expect the application to be supported by a full Transport Assessment which will need to be fully scoped with Northamptonshire Highways as per NCC policy.

We would suggest that the application should add to the list of committed developments that need to be assessed for traffic impact, these are;

Centrix Park

Genner Road

Cockerell Road

Stanion Plantation

Weldon Park

Tresham, Deenethorpe Airfield, ENC

However, should the application use NSTM to model, this should include all of the relevant developments.

The application site will need to adhere to the requirements of;

Northamptonshire Highway Development Strategy, December 2013.

In particular policies;

Policy DM2 - Northamptonshire County Council will require promoters of developments to agree the scope of Transport Assessment/Statements with Northamptonshire Highways in accordance with national guidance with particular inference on:

- Assessment and Mitigation of the effects on the highway network of the traffic generated by the Development in highway safety and capacity terms
- Making best possible use of the existing transport infrastructure
- Managing access of the highway network
- Demonstrate effective connections to the strategic road network
- Not focus on road building or highway capacity enhancement as the sole means of catering for the transport demand generated by the development
- On implementing Northamptonshire County Councils; modal shift targets
- Actively address the environmental impact of travel improving sustainable transport choices
- Maximise accessibility by walking, cycling and public transport modes
- Have proactive and appropriately funded Travel Plans which assist in influencing travel behaviour

Policy DM3 – Northamptonshire County Council will work with Borough and District Councils and developers to ensure that effective, adequately funded, resourced and monitored Travel Plans are created and implemented.

Policy DM4 – Northamptonshire County Council requires all developers to mitigate the impacts of their development in highway safety and capacity terms to a minimum Nil-Detriment basis ensuring the long term integrity of the highway network in highway safety and capacity terms.

North Northamptonshire Joint Core Strategy 2011- 2031, July 2016.

NCC Highways, Transport & Infrastructure Network Management Plan 2013

The views, observations, comments and recommendations contained in this response represent those of Northamptonshire Highways on behalf of Northamptonshire County Council as Local Highway Authority and in no other function or authority.

As well as the County Councils requirements for PRow, adoptable road layouts, internal site layouts including parking, visibility, servicing, drainage etc.

The advice is given without prejudice to the views which may be expressed by Northamptonshire County Council as Highway Authority, should an application be made.

Planning Permission does not give or imply permission for adoption of new highway or to implement any works within the highway and / or a Public Right of Way.

Development Management Engineer, Kettering and Corby Boroughs
For Assistant Director of Environment, Planning, and Transport
One Angel Square, Angel Street
Northampton, NN1 1ED

DDI +44(0)1604 367146

Web www.kierwsp.co.uk

Email highwaysdcKettering@kierwsp.co.uk

Or highwaysdcCorby@kierwsp.co.uk

FAO: Phil Watson
Northamptonshire County Council

Our ref: AN/2019/128684/01-L01
Your ref: 19/00001/SCO

Date: 26 February 2019

Dear Phil

**Scoping Opinion for Energy Recovery Facility
Willowbrook East Industrial Estate, Shelton Road, Corby NN17 5XH**

Thank you for your email on 11 February 2019 seeking our views on the proposed scope of the Environmental Impact Assessment (EIA) for the above site. We would like to make the following comments:

Groundwater and contaminated land

We have reviewed the EIA Scoping Report (ref: 0488636) dated January 2019. We have no concerns with the proposed approach to issues of contamination as outlined in Table 3, section 'Soils, Geology and Contamination'. No further intrusive investigation works are considered to be required at this time, however the developer should ensure that all appropriate investigation reports are submitted in support of any future full planning application for the proposed development.

Flood risk

We have no concerns with the proposed scope of the EIA in terms of flood risk as the site is wholly within Flood Zone 1.

We would require access to the watercourse to be maintained at all times. It is not clear from the scoping report whether any works are proposed within 8 metres of the main river. If you require any information on whether an environmental permit (flood risk activity permit) would be required for the site please contact the Partnerships and Strategic Overview team on psown@environment-agency.gov.uk.

Environmental permitting regulations – flood risk activity permit

The Environmental Permitting (England and Wales) Regulations 2016 require a permit to be obtained for any activities which will take place:

- on or within 8 metres of a main river (16 metres if tidal)
- on or within 8 metres of a flood defence structure or culvert (16 metres if tidal)
- on or within 16 metres of a sea defence
- involving quarrying or excavation within 16 metres of any main river, flood defence (including a remote defence) or culvert
- in a floodplain more than 8 metres from the river bank, culvert or flood defence

Environment Agency

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

Customer services line: 03708 506 506

*Calls to 03 numbers cost the same as calls to standard
geographic numbers (i.e. numbers beginning with 01 or 02).*

Cont/d..

structure (16 metres if it's a tidal main river) and you don't already have planning permission.

For further guidance please visit <https://www.gov.uk/guidance/flood-risk-activities-environmental-permits>.

Environmental permitting regulations - waste

This development will require a permit under The Environmental Permitting Regulations (England and Wales) 2016 from the Environment Agency to operate. A full assessment of the potential impact and mitigation of any potential emissions will be carried out as part of the determination process of the permit application.

For further guidance please visit <https://www.gov.uk/guidance/waste-environmental-permits>.

The applicant should not assume that a permit will automatically be forthcoming once planning permission has been granted, and we advise them to consult with us at the earliest opportunity.

The comments we set out above are without prejudice to future decisions we make regarding any applications subsequently made to us for our permits or consents for operations at the site.

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 sincerely

Keri Monger
Sustainable Places - Planning Adviser

Direct dial 020 847 48545

Direct e-mail keri.monger@environment-agency.gov.uk



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: 19/00001/SCO

Our Ref: 49559

Phil Watson
Planning Services (Development Control)
One Angel Square
Angel Street
Northampton
NN1 1ED

15/2/2019

Dear Mr Watson,

Re. Proposed development: scoping opinion for Scoping Opinion for Proposed Energy Recovery Facility. Land At, Shelton Road, Willowbrook East Industrial Estate, Corby, Northamptonshire.

Thank you for including Public Health England (PHE) in the above scoping opinion request. 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 consultations, although we note that we are not a statutory consultee for local planning applications.

The appendix outlines generic considerations that we advise are addressed by all applicants when they are preparing Environmental Statements (ES) for the Local Planning Authority. In terms of the level of detail to be included in ESs, we recognise that the differing nature of projects is such that their impacts will vary. Our view is that the assessments undertaken to inform the ES should be proportionate to the potential impacts of the proposal. Where an applicant determines that it is not necessary to undertake detailed assessment(s) (e.g. undertakes qualitative rather than quantitative assessments), if the rationale for this is fully explained and justified within the application documents, then we consider this to be an acceptable approach.

Yours sincerely,

Haymond Lam
Environmental Public Health Scientist

E-mail: CRCENottingham@phe.gov.uk

Enc. Scoping Document Appendix

Appendix: PHE recommendations regarding EIA Scoping

General approach

The EIA should give consideration to best practice guidance such as the Government's Good Practice Guide for EIA¹. It is important that the EIA identifies and assesses the potential public health impacts of the activities at, and emissions from, the installation. Assessment should consider the development, operational, and decommissioning phases.

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). We believe 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 relevant policy statements, guidance and standards should also be highlighted.

It is not PHE's role to undertake these assessments on behalf of promoters as this would conflict with our role as an impartial and independent body.

Consideration of alternatives (including alternative sites, choice of process, and the phasing of construction) is widely regarded as good practice. Ideally, EIA should start at the stage of site and process 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 ES².

The following text covers a range of issues that we would expect to be addressed by the promoter. However, this list is not exhaustive and the onus is on the promoter to ensure that the relevant public health issues are identified and addressed. Our advice and recommendations carry no statutory weight and constitute non-binding guidance.

Receptors

The ES 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. 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 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.

¹ Environmental Impact Assessment: A guide to good practice and procedures - A consultation paper; 2006; Department for Communities and Local Government. Available from: <http://webarchive.nationalarchives.gov.uk/20100410180038/http://communities.gov.uk/planningandbuilding/planning/sustainabilityenvironmental/environmentalimpactassessment/>

² DCLG guidance, 1999 <http://www.communities.gov.uk/documents/planningandbuilding/pdf/155958.pdf>

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

Emissions to air and water

Significant impacts are unlikely to arise from installations which employ Best Available Techniques (BAT) and which meet regulatory requirements concerning emission limits and design parameters. However, we have a number of comments regarding emissions in order that the EIA 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
- should encompass all pollutants which may be emitted by the installation in combination with all pollutants arising from associated development and transport, ideally these should be considered in a single holistic assessment
- should consider the construction, operational, and decommissioning phases
- should 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
- should fully account for fugitive emissions
- should include appropriate estimates of background levels
- should identify cumulative and incremental impacts (i.e. 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 (i.e. rail, sea, and air)
- should include consideration of local authority, Environment Agency, Defra national network, and any other local site-specific sources of monitoring data
- should compare predicted environmental concentrations to the applicable standard or guideline value for the affected medium (such as UK Air Quality Standards and Objectives and Environmental Assessment Levels)
 - If no standard or guideline value exists, the predicted exposure to humans should be estimated and compared to an appropriate health-based value (a Tolerable Daily Intake or equivalent). Further guidance is provided in Annex 1
 - 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
- should 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 (e.g. 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.

Our view is that the EIA 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.

Reducing public exposures to non-threshold pollutants (such as particulate matter and nitrogen dioxide) below air quality standards has potential public health benefits. We support approaches which minimise or mitigate public exposure to non-threshold air pollutants, address inequalities (in exposure), and maximise co-benefits (such as physical exercise) and encourage their consideration during development design, environmental and health impact assessment, and development consent.

Additional points specific to emissions to air

When considering a baseline (of existing air quality) and in 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)
- should include modelling using appropriate meteorological data (i.e. come from the nearest suitable meteorological station and include a range of years and worst case conditions)
- should include modelling taking into account local topography

Additional points specific to emissions to water

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

- should include assessment of potential impacts on human health and not focus solely on ecological impacts
- should identify and consider all routes by which emissions may lead to population exposure (e.g. surface watercourses; recreational waters; sewers; geological routes etc.)
- should 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
- should 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 promoter to provide details of any hazardous contamination present on site (including ground gas) as part of the 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 assessed³ and the potential impact on nearby receptors and control and mitigation measures should be outlined.

³ 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)

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

For wastes delivered to the installation:

- the EIA should 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

For wastes arising from the installation the EIA should consider:

- 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

Other aspects

Within the EIA we would expect to see information about how the promoter 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.

The EIA should include consideration of 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 2009: both in terms of their applicability to the installation itself, and the installation'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 report⁴, jointly published by Liverpool John Moores University and the Health Protection Agency (a predecessor organisation to PHE), examined health risk perception and environmental problems using a number of case studies. As a point to consider, the report suggested: "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. This is true even when the physical health risks may be negligible." We support the inclusion of this information within EIAs as good practice.

Electromagnetic fields (EMF)

⁴ Available from: <http://www.cph.org.uk/wp-content/uploads/2012/08/health-risk-perception-and-environmental-problems--summary-report.pdf>

This statement is intended to support planning proposals involving electrical installations such as substations and connecting underground cables or overhead lines. Our advice on the health effects of power frequency electric and magnetic fields is available in the following link:

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

There is a potential health impact associated with the electric and magnetic fields around substations, and power lines and cables. The field strength tends 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

The Department of Energy and Climate Change has published a voluntary code of practice which sets out key principles for complying with the ICNIRP guidelines:

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

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:

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

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

Exposure Guidelines

We recommend 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 was published by one of PHE's predecessor organisations (NRPB) in 2004 based on an accompanying comprehensive review of the scientific evidence:-

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

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 in line with the terms of the 1999 EU Council Recommendation on limiting exposure of the general public (1999/519/EC):

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

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.

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 the field. 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 themselves limits but provide guidance for assessing compliance with the 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)

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:

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

SAGE issued its First Interim Assessment in 2007, making several recommendations concerning high voltage power lines. Government supported the implantation of low cost

options such as optimal phasing to reduce exposure; however it did not support not support the option of creating corridors around power lines 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 here:

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

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

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 Protection⁵ (ICRP) are followed. We provide advice on the application of these recommendations in the UK. The ICRP recommendations are implemented in the Euratom Basic Safety Standards⁶ (BSS) and these form the basis for UK legislation, including the Ionising Radiation Regulations 1999, the Radioactive Substances Act 1993, and the Environmental Permitting Regulations 2016.

We expect promoters 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 us. 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 we would 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 fetus should also be calculated⁷. 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 2012'⁸. It is important that the methods used

⁵ These recommendations are given in publications of the ICRP notably publications 90 and 103 see the website at <http://www.icrp.org/>

⁶ 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.

⁷ 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>

⁸ The Environment Agency (EA), Scottish Environment Protection Agency (SEPA), Northern Ireland Environment Agency, Health Protection Agency and the Food Standards Agency (FSA).

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 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 our advice on radiological criteria and assessments for land-based solid waste disposal facilities⁹. We advise 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. We also advise that assessments of radiological impact during the post 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.

Environmental Permitting

Amongst other permits and consents, the development will require an environmental permit from the Environment Agency to operate (under the Environmental Permitting (England and Wales) Regulations 2016). Therefore, the installation will need to comply with the requirements of best available techniques (BAT). PHE is a consultee for bespoke environmental permit applications and will respond separately to any such consultation.

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/geho1202bklh-e-e.pdf

⁹ HPA RCE-8, Radiological Protection Objectives for the Land-based Disposal of Solid Radioactive Wastes, February 2009

Annex 1

Human health risk assessment (chemical pollutants)

The points below are cross-cutting and should be considered when undertaking a human health risk assessment:

- The promoter should consider including Chemical Abstract Service (CAS) numbers alongside chemical names, where referenced in the ES
- Where available, the most recent United Kingdom standards for the appropriate media (e.g. 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, those recommended by the European Union or World Health Organization can be used
- When assessing the human health risk of a chemical emitted from a facility or operation, the background exposure to the chemical from other sources should be taken into account
- When quantitatively assessing the health risk of genotoxic and carcinogenic chemical pollutants we do 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) approach¹⁰ is used

¹⁰ Benford D et al. 2010. Application of the margin of exposure approach to substances in food that are genotoxic and carcinogenic. Food Chem Toxicol 48 Suppl 1: S2-24

Date: 14 February 2019
Our ref: 273512
Your ref: 19/00001/SCO



Northamptonshire County Council
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BY EMAIL ONLY

Hornbeam House
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T 0300 060 3900

Dear Si/Madam,

Environmental Impact Assessment Scoping consultation (Regulation 15 (4) of the Town & Country Planning EIA Regulations 2017): Scoping Opinion for Proposed Energy Recovery Facility Land

Location: Land At Shelton Road, Willowbrook East Industrial Estate, Corby, Northamptonshire

Thank you for your consultation dated and received by Natural England on 11 February 2019.

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.

The scoping request is for a proposal that does not appear, from the information provided, to affect any nationally designated geological or ecological sites (Ramsar, SPA, SAC, SSSI, NNR) or landscapes (National Parks, AONBs, Heritage Coasts, National Trails), or have significant impacts on the protection of soils (particularly of sites over 20ha of best or most versatile land), nor is the development for a mineral or waste site of over 5ha.

At present therefore it is not a priority for Natural England to advise on the detail of this EIA. We would, however, like to draw your attention to some key points of advice, presented in annex to this letter, and we would expect the final Environmental Statement (ES) to include all necessary information as outlined in Part 4 of the Town & Country Planning (Environmental Impact Assessment) Regulations 2017. If you believe that the development does affect one of the features listed in paragraph 3 above, please contact Natural England at consultations@naturalengland.org.uk, and we may be able to provide further information.

Yours faithfully

Danielle Priestner
Consultations Team

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:

1. A description of the development, including in particular:
 - (a) a description of the location of the development;
 - (b) a description of the physical characteristics of the whole development, including, where relevant, requisite demolition works, and the land-use requirements during the construction and operational phases;
 - (c) a description of the main characteristics of the operational phase of the development (in particular any production process), for instance, energy demand and energy used, nature and quantity of the materials and natural resources (including water, land, soil and biodiversity) used;
 - (d) an estimate, by type and quantity, of expected residues and emissions (such as water, air, soil and subsoil pollution, noise, vibration, light, heat, radiation and quantities and types of waste produced during the construction and operation phases.

2. 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.

3. A description of the relevant aspects of the current state of the environment (baseline scenario) and an outline of the likely evolution thereof 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.

4. A description of the factors specified in regulation 4(2) likely to be significantly affected by the development: population, human health, biodiversity (for example fauna and flora), land (for example land take), soil (for example organic matter, erosion, compaction, sealing), water (for example hydromorphological changes, quantity and quality), air, climate (for example greenhouse gas emissions, impacts relevant to adaptation), material assets, cultural heritage, including architectural and archaeological aspects, and landscape.

5. A description of the likely significant effects of the development on the environment resulting from, inter alia:
 - (a) the construction and existence of the development, including, where relevant, demolition works;
 - (b) the use of natural resources, in particular land, soil, water and biodiversity, considering as far as possible the sustainable availability of these resources;
 - (c) the emission of pollutants, noise, vibration, light, heat and radiation, the creation of nuisances, and the disposal and recovery of waste;
 - (d) the risks to human health, cultural heritage or the environment (for example due to accidents or disasters);
 - (e) the cumulation of effects with other existing and/or approved projects, taking into account any existing environmental problems relating to areas of particular environmental importance likely to be affected or the use of natural resources;
 - (f) the impact of the project on climate (for example the nature and magnitude of greenhouse gas emissions) and the vulnerability of the project to climate change;
 - (g) the technologies and the substances used. The description of the likely significant effects on the factors specified in regulation 4(2) should cover the direct effects and any indirect, secondary, cumulative, transboundary, short-term, medium-term and long-term, permanent and temporary, positive and negative effects of the development. This description should take into account the environmental protection objectives established at Union or Member State level which are relevant to the project, including in particular those established under Council Directive 92/43/EEC (a) and Directive 2009/147/EC(b).

6. A description of the forecasting methods or evidence, used to identify and assess the significant effects on the environment, including details of difficulties (for example technical deficiencies or lack of knowledge) encountered compiling the required information and the main uncertainties involved.

7. A description of the measures envisaged to avoid, prevent, reduce or, if possible, offset any identified significant adverse effects on the environment and, where appropriate, of any proposed monitoring arrangements (for example the preparation of a post-project analysis). That description should explain the extent, to which significant adverse effects on the environment are avoided, prevented, reduced or offset, and should cover both the construction and operational phases.

8. A description of the expected significant adverse effects of the development on the environment deriving from the vulnerability of the development to risks of major accidents and/or disasters which are relevant to the project concerned. 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.

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 ([NPPF](#)) sets out guidance in S.118 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

Natural England undertakes an initial assessment of all development consultations, by determining whether the location to which they relate falls within geographical 'buffer' areas within which development is likely to affect designated sites. The proposal is located outside these buffer areas and therefore appears unlikely to affect an Internationally or Nationally designated site. However, it should be recognised that the specific nature of a proposal may have the potential to lead to significant impacts arising at a greater distance than is encompassed by Natural England's buffers for designated sites. The ES should therefore thoroughly assess the potential for the proposal to affect designated sites, including Special Areas of Conservation (SAC), Special Protection Areas (SPA), Ramsar sites and Sites of Special Scientific Interest (SSSI). Should the proposal result in an emission to air or discharge to the ground or surface water catchment of a designated site then the potential effects and impact of this would need to be considered in the Environmental Statement

Local Planning Authorities, as competent authorities under the provisions of the Conservation of Habitats and Species Regulations 2017, should have regard to the Habitats Regulations Assessment process set out in Regulation 63 of the Habitats Regulations in their determination of a planning application. 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.

Statutory site locations can be found at www.magic.gov.uk. Further information concerning particular statutory sites can be found on the [Natural England website](#).

2.3. Protected Species

The ES should assess the impact of all phases of the proposal on protected 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.

Natural England has adopted [standing advice](#) for protected species. It provides a consistent level of basic advice which can be applied to any planning application that could affect protected species. It also includes links to guidance on survey and mitigation.

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.

2.4. Regionally and Locally Important Sites

The ES should thoroughly assess the impact of the proposals on non-statutory sites, for example Local Wildlife Sites (LoWS), Local Nature Reserves (LNR) and Regionally Important Geological and Geomorphological Sites (RIGS). Natural England does not hold comprehensive information on these sites. We therefore advise that the appropriate local biological record centres, nature conservation organisations, Local Planning Authority and local RIGS group should be contacted with respect to this matter.

2.5. Biodiversity Action Plan Habitats and Species

The ES should thoroughly assess the impact of the proposals on habitats and/or species listed in the UK Biodiversity Action Plan (BAP). These Priority Habitats and Species are listed as 'Habitats and Species of Principal Importance' within the England Biodiversity List, recently [published](#) under the requirements of S14 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 in the Defra publication '[Guidance for Local Authorities on Implementing the Biodiversity Duty](#)'.

Government Circular 06/2005 states that 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.

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

3. Landscape, Access and Recreation

3.1. Landscape and Visual Impacts

The consideration of landscape impacts should reflect the approach set out in the *Guidelines for Landscape and Visual Impact Assessment* (Landscape Institute and the Institute of Environmental Assessment and Management, 2013, 3rd edition), the *Landscape Character Assessment Guidance for England and Scotland* (Scottish Natural Heritage and The Countryside Agency, 2002) and good practice. 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 would expect

the cumulative impact assessment to include those 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.

3.2. Access and Recreation

The ES should include a thorough assessment of the development's effects upon public rights of way and access to the countryside and its enjoyment through recreation. With this in mind and in addition to consideration of public rights of way, the landscape and visual effects on Open Access land, whether direct or indirect, should be included in the ES.

Natural England would also expect to see consideration of opportunities for improved or new public access provision on the site, to include linking existing public rights of way and/or providing new circular routes and interpretation. We also recommend reference to 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.

4. Land use and soils

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 112 of the NPPF. We also recommend that soils should be considered under a more general heading of sustainable use of land and the valuing of the ecosystem services they provide as a natural resource in line with paragraph 109 of the NPPF.

Soil is a finite resource that fulfils many important functions and services (ecosystem services) for society; for instance 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 Natural Environment White Paper (NEWP) '*The Natural Choice: securing the value of nature*' (Defra, June 2011), emphasises the importance of natural resource protection, including the conservation and sustainable management of soils and the protection of BMV agricultural land.

Development of buildings and infrastructure prevents alternative uses for those soils that are permanently covered, and also often results in degradation of soils around the development as result of construction activities. This affects their functionality as wildlife habitat, and reduces their ability to support landscape works and green infrastructure. Sealing and compaction can also contribute to increased surface run-off, ponding of water and localised erosion, flooding and pollution.

Defra published a Construction [Code of Practice for the sustainable use of soils on construction sites](#) (2009). The purpose of the Code of Practice is to provide a practical guide to assist anyone involved in the construction industry to protect the soil resources with which they work.

As identified in the NPPF new sites or extensions to new sites for Peat extraction should not be granted permission by Local Planning Authorities or proposed in development plans.

General advice on the agricultural aspects of site working and reclamation can be found in the Defra [Guidance for successful reclamation of mineral and waste sites](#).

5. 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.

6. 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 109), which should be demonstrated through the ES.



Historic England

EAST MIDLANDS OFFICE

Mr Phil Watson
Northamptonshire County Council
PO Box 163
Floor 3 County Hall
Northampton
NN1 1AX

Direct Dial: 01604 735460

Our ref: PL00545223

22 February 2019

Dear Mr Watson

Thank you for your letter of 11/2/2019 requesting a scoping opinion from Historic England on proposals for the proposed energy recovery facility on land off Shelton Road, Willowbrook East Industrial Estate, Corby, Northamptonshire.

Advice

Historic England has reviewed the information submitted in the scoping report from the applicant and our own records for the proposed development area. In our view, this development is likely to have an impact upon a number of designated heritage assets and their settings in the area around the site. In line with the advice in the National Planning Policy Framework (NPPF), we would expect the Environmental Impact Assessment (EIA) documentation to contain a thorough assessment of the likely effects which the proposed development might have upon those elements which contribute to the significance of these assets. In this way it should be possible to identify (and where possible avoid, minimise or if appropriate mitigate) what may be substantial direct and indirect impacts on assets of local, regional and national importance.

In general terms, Historic England advises that a number of considerations will need to be taken into account when proposals of this nature are being assessed. In order for your authority to understand the potential impacts of the proposals on the significance of both designated and non-designated heritage assets of all types, we would recommend that you ensure that the Environmental Impact Assessment (EIA) conducted takes the following issues into account. This includes consideration of the impact of ancillary infrastructure:

- The potential impact upon the landscape, especially if a site falls within an area of historic landscape;
- Direct impacts on historic / archaeological fabric (buildings, sites or areas), whether statutorily protected or not;
- Other impacts, particularly the setting of listed buildings, scheduled monuments, registered parks and gardens, conservation areas etc., including long views and any specific designed views and vistas within historic designed landscapes. All grades of listed buildings should be identified. In some cases, inter-visibility



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- between historic sites may be a significant issue;
- The potential for buried archaeological remains;
 - Effects on landscape amenity from public and private land; and,
 - Cumulative impacts.

The level of carefully considered information required under the EIA process will need to be proportional to the severity of the potential issues which may arise from any proposed scheme, and directly related to the need to assess the overall sustainability of the development proposals.

Our initial assessment shows that the following numbers of designated heritage assets are located within c. 3km of the proposed development:

- **3 Scheduled Monuments;**
- **6 Listed Buildings (Grade I and II*);**
- **3 Conservation Areas; and,**
- **1 Park and Garden (Grade II*).**

These assets include (but not exclusively):

- 'Little Weldon Roman villa' scheduled monument (List Entry Number 1003898);
- 'Kirby Hall: An Elizabethan country house and gardens, including the remains of the medieval village of Kirby' scheduled monument (List Entry Number 1014421);
- 'Kirby Hall, attached walls and archways' Grade I listed building (List Entry Number 1372559); and,
- 'Kirby Hall' Grade II* registered park and garden (List Entry Number 1000116).

It is important that the EIA process identifies all of the heritage assets potentially affected by the development on the basis of an appropriately defined study area. We would expect one key assessment tool in defining this study area appropriately to be the production of a Zone of Theoretical Visibility as part of the Landscape and Visual Impact Assessment.

We advise that your authority must ensure that the EIA process provides a complete understanding of the significance of all the heritage assets potentially affected both individually and as part of the development of the wider historic landscape. The EIA must provide a clear understanding of any e.g. historic and spatial relationships between assets, whether designated or non-designated, as well as the specific contribution which the development site makes to the significance of any designated assets affected.

It is essential that the EIA then provides your authority with a robust assessment of the specific impact of all elements of the proposed development on the significance of all the affected designated heritage assets, with emphasis on the significance they derive from their settings. Sufficient information will therefore need to be provided on the



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type, scale and massing of the proposed development. It must also take into consideration the impact that the change in landscape character resulting from development would have on an asset's significance.

In general we recommend that there should be a close relationship between the Landscape and Visual Impact Assessment and the Cultural Heritage Assessments. Your authority must ensure that the EIA will provide you with a robust assessment of the impact of development on the setting of designated heritage assets including, but not limited to visual impacts. Heritage Assets are key visual receptors and any impact upon them would need to be considered in depth with appropriate selection of viewpoints relevant to the significance of the assets in question and the likely impacts. We would recommend the inclusion of long views and any specific designed or historically relevant views and vistas within the surrounding landscape.

We would also expect the EIA to consider the potential impacts on non-designated features of historic, architectural, archaeological or artistic interest, since these can also be of national importance and make an important contribution to the character and local distinctiveness of an area and its sense of place.

Historic England has the following specific comments to make regarding Table 3: 'Townscape and Visual Amenity':

Historic England considers it essential that heritage considerations are included in the proposed scope of this chapter to ensure that the results can be integrated with those of the 'Archaeology and Cultural Heritage' chapter. We therefore welcome inclusion of Kirby Hall, Rockingham Castle and Deene Park as sensitive receptors in this chapter, and that visibility will be considered when deciduous trees are out of leaf. We also welcome the inclusion of Kirby Hall as one of the key viewpoints (Distant Viewpoint Location 16), and photomontages and other representations should be developed and included in the Environmental Statement.

Historic England has the following specific comments to make regarding Table 3: 'Archaeology and Cultural Heritage':

Welcome the acknowledgement that the taller stacks in the proposed development may have greater visibility than the 2016 scheme and consequently new cultural heritage receptors may be affected. We would consider a 3km assessment zone to be appropriate for a development of this size and mass.

Historic England recommends that an approach to the significance of designated heritage assets is reflective of the assessment criteria for the designation process, can be easily understood within the language of the NPPF regarding the significance of heritage assets and the impact of proposals on that significance, and takes full account of the most recent published advice. We therefore welcome the reference to

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'Historic Environment Good Practice Advice in Planning Notes 3: The Setting of Heritage Assets' and 'Conservation Principles, Policies and Guidance'. We would recommend that 'Historic Environment Good Practice Advice in Planning Note 2: Managing Significance in Decision-Taking in the Historic Environment' is also utilised.

Historic England has the following specific comments to make regarding Appendix B: 'Method for EIA':

We consider that approaches adopting tabular and matrices based assessment provide little useful contribution to the assessment of heritage impacts and tend to confuse concepts of the significance, sensitivity and magnitude of impact whilst atomising complex relationships between features and apparent impacts. We recommend that the approach takes its cue from the sensitivity of individual assets and/or groups of assets to the specific types of change associated with the proposed development and their capacity to absorb the effects of such change within their settings rather than the relative value of individual assets. We consider that an approach of this nature provides a more meaningful context for discussion.

Recommendation

Historic England urges your authority to address the issues set out above with the applicant to ensure that the EIA will provide a sound basis on which to assess the significance of any heritage assets affected and the effect on significance of the impacts of the proposed scheme. A sound EIA report is the basis on which to identify (and where possible avoid, minimise or mitigate) what may be substantial direct and indirect impacts on assets of local, regional and national importance.

If you have any queries about any of the above, or would like to discuss anything further, please contact me.

Yours sincerely,

Dr Andy Hammon
Inspector of Ancient Monuments
Andy.Hammon@HistoricEngland.org.uk



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Dear Phil,

Environmental Protection has been consulted directly on this request to determine the extent of information required for inclusion in an Environmental Statement (ES) for an energy recovery facility at the above address. It is noted the site has planning permission under 16/00028/WASFUL for a similar process at the site and an ES was submitted in support of that application.

The proposed changes to the facility permitted under 16/00028/WASFUL are detailed in Table 1 of the Environmental Impact Assessment (EIA) Scoping Report submitted with the application. The main changes being an increase in the through put of refuse derived fuel, increase in power generation, building specification (increase in height and smaller footprint) and change to two flues of 70 – 80m in height.

Air quality and odour

A detailed assessment of stack emissions will be undertaken as part of the EIA. Odour emissions are expected to be similar to the 2016 ES, which confirmed there would be a negligible impact. A verification exercise will be undertaken to confirm this.

Noise and vibration

The EIA will include an impact assessment of operational noise. This will include calculations and additional modelling.

Soils, geology and contamination

The EIA will assess the reports from the 2016 ES but only anticipates minor changes to the conclusions. There will be no further intrusive investigations.

Given the above Environmental Protection have no objections to the scope of the EIA.

Regards

Mandy

Mandy Dennis

Senior Environmental Protection Officer

East Northamptonshire Council

Tel: 01832 742037

Please note that from 1 February 2017, the council will open for business on Wednesdays at 9.45am.

Please visit our website for online information and services

<https://clicktime.symantec.com/3DV9GiZBWgppv3KKtL9jFtL6H2?u=www.east-northamptonshire.gov.uk>

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Andrew McPheat
Iceni Projects
AMcPheat@iceniprojects.com

Our ref: AN/2019/128498/01-L01
Your ref: 190109/DR07
Date: 24 January 2019

Dear Andrew

**Proposed Energy Recovery Facility
Land At Shelton Road Willowbrook East Industrial Estate Corby NN17 5XH**

Thank you for your recent enquiry regarding the above proposed development, which was received on 09 January 2019.

Having reviewed your proposal we are providing you with a preliminary opinion, which outlines the key environmental issues within our remit that are relevant to your proposal and provides guidance on any actions you need to undertake. We offer one free preliminary opinion per applicant.

If you'd like further advice, we would be pleased to offer this through our charged for service. Further details can be found at the end of this letter.

Environmental constraints -

Based on our records, the proposed development is within an area where controlled waters are particularly sensitive because the site is located upon a secondary aquifer A.

Based on the information currently available, the development raises some environmental concerns that you will need to address as part of any planning application. Further work will be needed to show how these issues can be satisfactorily addressed to ensure no environmental impacts.

Contaminated Land

The proposed development site has been in industrial use for a significant period of time. It is highly likely that these uses had the potential to leave a legacy of land contamination. As part of a redevelopment of this site we would require the developer to undertake desk studies and site investigations to determine the extent of contamination on-site and then prepare a remediation strategy that will ensure that both during and after the construction phase there will be no adverse impacts on the environment. These reports should be included with the planning application. Where these reports are missing, or where they don't demonstrate that a redevelopment of the site can go ahead without environmental damage we will likely raise an objection to the planning application.

Environmental Permitting Regulations

Environment Agency
Nene House Pytchley Lodge Road, Kettering, Northamptonshire, NN15 6JQ.
Customer services line: 03708 506 506
www.gov.uk/environment-agency

Cont/d..

Installations Permit

This facility will require a bespoke Environmental Permit to operate.

As required under the Environmental Permitting (England and Wales) Regulations 2016, we will undertake pre-application discussions with the operator to identify environmental impacts of the facility and will subsequently undertake a full assessment following receipt of the Environmental Permit application.

Flood Risk Activity Permit

The site is located just to the south of Willow Brook North a designated 'Main River'. A Flood Risk Activity Permit is required for any works within 8 metres of the top of the river bank. The granting of planning permission does not preclude the need to obtain our consent as well.

Further Advice

Whilst we have identified some potential issues with your proposed development, we are keen to work with you in resolving these so that we do not have to raise an objection at any formal planning application stage.

Should you wish us to undertake a detailed review of your land contamination reports, we can do this as part of our charged service.

Further engagement at the pre-application stage will speed up our formal response to your planning application and provide you with certainty as to what our response to your planning application will be. It should also result in a better quality and more environmentally sensitive development. As part of our charged for service we will provide a dedicated project manager to act as a single point of contact to help resolve any problems.

We currently charge £100 per hour. We will provide you with an estimated cost of any further discussions or review of documents. The terms and conditions of our charged for service are available [here](#).

Please note, this response is based on the information you have made available at this time. It is based on current national planning policy, associated legislation and environmental data / information. If any of these elements change in the future then we may need to reconsider our position.

We trust that the above information is of assistance. If you'd like further detailed advice, please don't hesitate to contact me using the details below.

Yours faithfully

Jennifer Moffatt
Sustainable Places Planning Adviser

Direct dial 02030 253488

Direct e-mail jennifer.moffatt@environment-agency.gov.uk



**Northamptonshire County Council
Lead Local Flood Authority**

Local Planning Authority	Northamptonshire County Council
Application Reference	19/00001/SCO
Proposal	"Scoping Opinion for Proposed Energy Recovery Facility"
Location	Land At, Shelton Road, Willowbrook East Industrial Estate, Corby, Northamptonshire
Consultation Date	11 th February 2019
Response Date	12 th February 2019

Dear Phil,

Thank you for consulting us to request a Scoping Opinion for the above planning application submitted by Pegasus Group on behalf of Barratt Development and Davidsons Developments Limited.

National Planning Policy Framework (NPPF) Paragraph 103 requires applicants for planning permission to submit a Flood Risk Assessment (FRA) when development is greater than one hectare. In addition, all Major applications are now required to be assessed for their impact on surface water drainage.

For an EIA application, the Environmental Statement should fully consider the impact of the development on surface water.

Full details of what we would require to see in terms of surface water drainage assessment, can be found within our developer guidance which is on our web page at

<http://www.floodtoolkit.com/planning/surface-water-drainage/>

In view of the above, should you require any further information, or wish to discuss these matters further, please do not hesitate to contact us.

Yours Faithfully,

Malcolm Ball

Drainage Engineer

For & on Behalf of Northamptonshire County Council – Lead Local Flood Authority

Surface Water Drainage, Northamptonshire County Council

County Hall, Northampton NN1 1DN

w. www.floodtoolkit.com

t. 01604 367805

e. swdrainage@northamptonshire.gov.uk



Northamptonshire
County Council

Disclaimer:

This response is made by the County Council in its capacity as a Lead Local Flood Authority as a statutory consultee. As a Lead Local Flood Authority (LLFA) we respond to Planning Applications considering where development has the greatest ability to affect flood risk. For the avoidance of doubt we do not comment on water quality, contaminated land/landfill, waste water, risk of flooding from ground water, biodiversity and ecological impacts, fisheries, water framework directive, amenity, health & safety, or navigation.

These comments should be taken as general comments on surface water drainage only. A detailed review of any technical assessments, methodology and results has not been undertaken by the LLFA. Liability for such technical work therefore rests with organisation(s) who have undertaken this technical work and the Local Planning Authority responsible for the planning decision.