

Proposed Sustainable Energy Plant at Brunner Mond, Lostock, Northwich, Cheshire

Response to Representations Report

On behalf of Brunner Mond & E.ON Energy from
Waste UK Limited

Prepared by:



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I Introduction

- I.1 In February 2010, RPS submitted an application for consent under Section 36 of the Electricity Act for a Sustainable Energy Plant to the Department of Energy and Climate Change (DECC). An application for deemed consent under s.90 of the Planning Act was also made. The applications are made on behalf of Brunner Mond Ltd and E.ON Energy from Waste Ltd.
- I.2 As part of its duty as the decision making authority, DECC consulted with a number of statutory organisations as well as the general public (third parties), inviting representations. In accordance with regulations 4,6 and 7 of the Electricity (Applications for Consent) Regulations 1990 (SI 1990 No 455) RPS prepared and submitted press notices in the Northwich Guardian, London Gazette and The Guardian to inform the public of the submission of the application as well as locations where the application documents could be viewed. A number of public notices were also placed at prominent positions within a one mile radius of the application site. The notices explained the consultation process, its duration and to whom representations relating to the application should be sent..
- I.3 The consultation period began on 6th April 2010 and ran until 5th May 2010 and therefore exceeded the statutory 28 day requirement as set out in the above regulations. All responses were sent directly to the case officer at DECC although many representations were also copied to planning officers at Cheshire West and Chester Council (CWACC), the local planning authority, in which the proposed development lies.
- I.4 Following the end of the consultation period, DECC sent copies of all representations received to RPS as well as the planning officers at CWACC. Over 2000 third party representations were received during the consultation period in addition to the responses from statutory organisations.
- I.5 The purpose of this document is to identify the main issues raised during the consultation process and to address the main concerns. A spreadsheet analysis and brief summary of responses form Appendix I of this document.

2 Response to Statutory Consultee Comments

- 2.1 To help inform their consideration of the application, DECC and the Secretary of State for Energy and Climate Change, consult a number of statutory consultees. The statutory consultees tend to respond with either 'no objection' or 'objection' to the proposed development and make additional comments where they consider it necessary or desirable. This chapter provides a summary of the responses received from the statutory consultees and detail our corresponding response to any issues raised by them.
- 2.2 The **Civil Aviation Authority (CAA)** raised '**no objection**' to the proposed development on the basis that no part of the scheme involves development above 91.4m in height. The highest element of the proposed development are the stacks and these extend to 90m in height and as a result they considered that the proposals raised no conflict with their operations. RPS welcomes the 'no objection' and considers no further response is required.
- 2.3 The **Department for the Environment, Food and Rural Affairs (DEFRA)** stated in its consultation response that it is **fully supportive** of the proposed development, since it will help to create and safeguard jobs at the Brunner Mond facility as well as provide a more environmentally sustainable way of creating energy and disposing of non-recyclable waste. RPS welcomes the support from DEFRA and considers no further response is required.
- 2.4 The **Environment Agency (EA)** raised '**no objection**' to the proposed development. A number of conditions are proposed relating to the provision of details of flood risk mitigation. The applicants intend to provide such details. RPS welcomes the support from the EA.
- 2.5 The EA goes on to make additional comments on the Planning Supporting Statement and indicating that in their view it concentrates more on the need for an energy facility spatially than the waste management need. The EA also adds that the application submissions provide little justification as to why the facility is needed in the area and that this warrants further supporting documentation.
- 2.6 RPS is of the view that appropriate justification and explanation is given in the original application documentation. The emphasis given to energy in the original Planning Supporting Statement is appropriate and commensurate with the fact that this is an energy producing plant. It is not one that has been primarily designed to directly address any waste management need. The revised Supporting Statement provides further commentary as to why the development is necessary at the site and further analysis of compliance with relevant planning policy.

- 2.7 The **Ministry of Defence (MOD)** has responded to DECC's consultation by confirming that they have '**no objection**' to the proposed development since the site is outside MOD safeguarding areas.
- 2.8 **NATS**, the national air travel safety organisation has issued a consultation response to DECC confirming that it has '**no objection**' to the proposed development since they do not consider it to have the potential to affect air traffic safety. Consequently no response is deemed necessary to this representation.
- 2.9 The **Highways Agency** has made '**no objection**' to the proposed development and has commented that they consider that the proposals will not have a significant impact on the highway network that falls under their jurisdiction. A response from CWACC's Highways Department will form part of CWACC's overall decision and comments from the local authority have not been received to date.
- 2.10 **Natural England (NE)** stated in its consultation response that it considers that the information currently provided is insufficient to determine whether the proposal is likely to have a significant effect on the features of the nearby internationally and nationally designated ecological sites. The consultation comments explain the information that Natural England consider necessary to enable them to fully assess the proposals including the following: an assessment of hydrogen fluoride to establish the impacts on the designated sites, consideration of the deposition of heavy metals and its associated impacts on the designated sites, an alteration to the figures used in the analysis of critical levels of ammonia for Sites of Special Scientific Interest (SSSIs) from $3\mu\text{g}/\text{m}^3$ to $1\mu\text{g}/\text{m}^3$, and an additional set of data to show the individual emissions contribution from the proposed development rather than also incorporating existing background levels of emissions.
- 2.11 In response to Natural England's comments a meeting was held with relevant professionals at Natural England on the 26th July 2010 in order to establish the exact details of the information required by Natural England and the methodology to be used in undertaking the necessary assessments. The revised air quality assessments in Appendix 2 of the Environmental Statement Addendum have addressed all concerns and requirements raised by Natural England and concludes that there will be no significant individual or cumulative effects on any ecology sites within a 15km radius of the site. Natural England also set in its consultation response the various additional ecology surveys that are required and the methodologies to be used in undertaking the surveys. All relevant ecology surveys and assessments have now been carried out in accordance with Natural England requirements and have been included in Appendices 3, 4 and 5 of the Environmental Statement Addendum document. Following the meeting with Natural England, detailed minutes outlining the nature and content of the discussions were sent to Natural England for their consideration as to whether the conclusions drawn from the meeting were in line with their understanding (see Appendix 6 of the Environmental

Statement Addendum). Natural England duly confirmed that they were in agreement with the interpretation of the meeting and the consequent approach suggested.

- 2.12 All of the statutory consultees will be re-consulted following the submission of the additional information to DECC in September (of which this document is a part). In addition to the comments received from the statutory consultees detailed previously, DECC also received a significant number of representations from members of the public (third parties) and these will be similarly assessed in the following chapter.

3 Issues Identified in Third Party Representations

3.1 Over 2000 representations relating to the proposed energy plant were received by DECC during the April/May 2010 consultation period. There were a mixture of representations both supporting and objecting to the proposal. The key issues raised on both sides are examined below.

3.2 The representations supporting the proposed development cited the following key issues:

Need

Brunner Mond has been a significant contributor to the local economy over many years and the uncertainty over future energy supply and its fluctuating costs are putting additional pressure on the future viability of the business which is now the UK's only manufacturer of soda ash and sodium bicarbonate, a major supplier to the British glass, food and pharmaceutical industries. The project will help to preserve and grow manufacturing jobs in the region.

Sustainability

The proposed plant would use 'state of the art' technology to reduce fossil fuel usage and maximise energy conservation by supplying a sustainable heat source adjacent to its end user. The project will help recover energy from material that would otherwise go to landfill and is aligned with the government's policies on climate change associated with reduction of waste to landfill and moving towards a lower carbon economy.

Location

The site is well located to accommodate an energy plant given that it is proposed on a derelict brownfield site that has an existing redundant coal fired power station on it. The site is allocated in the Cheshire Replacement Waste Local Plan for thermal treatment of waste which is the secondary function of the proposed energy plant. The site is well located so as to benefit from excellent existing road and rail links and there will be no additional visual impact since it is replacing an existing power station in wider industrial surroundings.

Health Risks

Plants similar to that proposed at Lostock have been operating safely for many years in other European countries. The plant will be regulated under a strict set of European and UK regulations which will include rigorous testing and reporting and the application has been accompanied by a number of thorough assessments which have concluded that there will be no risk to human health and no significant effects on local important wildlife sites.

3.3 Whilst there is some documented local support, much of which is in line with the case for the development put forward in the submitted Supporting Statement and Environmental Statement, there has also been a significant number of objections received. Through analysis of these objections it has been possible to understand the most common issues raised by third parties.

3.4 For the purposes of the analysis of the objections, each has been grouped into a key issue in order to allow us to address it without undue repetition. The response is provided in the following chapter 4. The main areas of objection were:

- Effect on air quality and associated health implications (raised by 67% of objectors)
- The need for the proposed development (raised by 57% of objectors)
- The sustainability credentials of the proposed development (raised by 53% of objectors)
- The impact on local traffic and the road network (raised by 50% of objectors)
- Inappropriate location for the proposed development (raised by 33% of objectors)
- The potential for flooding/drainage/ and land contamination (raised by 12% of objectors)
- Impact on wildlife/ecology (raised by 9.5% of objectors)
- Visual impact (raised by 7% of objectors)
- Noise and disturbance (raised by 6% of objectors)
- The effect on nearby property/land values (raised by 4.5% of objectors)
- Insufficient consultation with the community (raised by 2% of objectors)

3.5 Many of the objection responses received raised more than one concern. In addition a significant number of objections were received by members or supporters of a group called Cheshire Anti Incinerator Network (CHAIN) which, for the purposes of this document, have been treated as third party objections and have therefore been included within the third party representations summary above.

4 Response to Issues Raised by Third Parties

- 4.1 The objections received by third parties during the consultation period are assessed in this chapter. They are grouped into key issues which are then addressed in turn. The analysis of the key issues in the previous chapter clearly demonstrate that the vast majority of concerns relate to four key issues: health, need, sustainability and traffic.

Air Quality and Health Effects

- 4.2 The most significant reason for objection by third parties (raised by 67% of objectors) relates to the potential impact on air quality and human health resulting from the proposed development. This is cited as an objection or concern in almost all EfW proposals made in the UK and is the one that continues to be explored during the consenting process. In accordance with best practise, a Health Impact Assessment and the Human Health Risk Assessment were produced in consultation with the Central and Eastern Cheshire Primary Care Trust. They demonstrate that the proposed development will have no adverse effect on the human health of the local population both through the assessment of potential emissions as well as the study of the impact that the emissions could have on human health both directly and via secondary effects such as through potential contamination of land and water. In addition, the development would be subject to very strict EU and UK permitting regulations involving regular monitoring and testing of the facility to ensure that it complies with the relevant air quality standards. Facilities such as the one proposed at Lostock have been functioning across the United Kingdom and Europe for many years now and there have been no documented negative health impacts as a result of their operation either in isolation or in combination with other similar nearby facilities.
- 4.3 The Environment Agency are the primary body responsible for assessing the potential health implications of a proposed development such as this rather than the wider NHS, a concern that has been raised in a number of objections. The Environment Agency has been consulted by DECC as part of the application process, and importantly, has raised no objection to the proposed development or any concern over the potential air quality or health implications of the scheme. The air quality calculations have addressed cumulative effects in that they have assessed not only the potential impact of the proposed development but also existing and proposed developments within the area that could potentially contribute to unacceptable levels of harmful emissions to the atmosphere. A number of proposed waste treatment facilities in the Cheshire area have recently been refused planning permission by the local planning authorities (Cheshire West and Chester Council and Cheshire East Council). However, in an attempt to make the assessments as robust as possible, these proposed developments have been included in all cumulative calculations made and which can be found in the Addendum to Environmental Statement submitted to DECC along with this document.

4.4 The potential impact on designated ecological sites through emissions from the proposed development has also been assessed, both individually and cumulatively, and these assessments demonstrate that there will be no significant effects on these sites. These assessments have been undertaken in consultation with Natural England and revised documentation to support this has been submitted as part of the Addendum to the Environmental Statement and will be explored further later in this chapter. (See Chapters 7 and 9 of the submitted Environmental Statement and the Environmental Statement Addendum.)

Need for SEP

4.5 Just over 57% of objectors considered the proposed development would be surplus to Cheshire's waste treatment requirements and consequently that there was no need for such a facility. The applicant is not aware of any upper limit of energy generation capacity in the region nor of any requirement to demonstrate need for such an energy facility. However, to the extent that need is a material consideration to the recommendation or decision RPS has addressed this. Chapter 4 of the submitted Environmental Statement and Chapter 1 of the new Supporting Statement set out the reasons behind the proposed development.

4.6 In essence, a renewable and reliable form of energy supply is required by Brunner Mond in order to guarantee its future in light of fluctuating energy costs and concerns over the security of supply of fossil fuels. A number of technologies were examined as part of the initial design process however it was concluded that only an energy from waste facility will provide sufficient heat/steam to Brunner Mond's production. Although there is a combined heat and power (CHP) facility at Brunner Mond's Winnington plant, this is still reliant on fossil fuels (gas) and is therefore not as sustainable or as economically reliable as the proposed energy plant which has the important secondary feature of preventing non-recyclable UK waste from being disposed of in landfill. An energy from waste facility such as that proposed at Lostock is considered to be a renewable form of energy production in key national planning policy documents (PPSI Supplement – Planning and Climate Change) and the EU Renewable Energy Directive/Fuel Quality Directive 2009 requires the UK to produce 15% of energy using renewable energy sources. Consequently the proposed development will help the UK meet its national and international energy requirements as part of the drive towards a lower carbon economy. However, the primary need for the proposed development is to ensure the future viability of Brunner Mond, a significant contributor to the local economy. The scale of the proposed sustainable energy plant is directly related to the requirements of the business whilst also generating enough surplus energy for supply to the national grid.

Sustainability Credentials

4.7 Just over half of objections (53%) raised a number of different points concerning the actual sustainability of the proposed development. A common concern related to the construction and

operation of waste treatment facilities actually discouraging the recycling of waste. Paragraphs 4.41 and 4.42 of the submitted Environmental Statement sets out the wider suitability of the scheme and how the proposed development accords with UK waste policy in addition to why the development proposed is the most sustainable and suitable option for the site. Whilst it is acknowledged that the combustion of waste products is not normally as environmentally sustainable as recycling, currently 30% of UK waste cannot physically be recycled and this figure is likely to stay broadly similar for the foreseeable future. Consequently almost one-third of waste will either go into landfill or be incinerated and it is now recognised that the continuing practice of large scale landfilling of waste is environmentally damaging and unsustainable. In the case of waste that cannot be recycled, its use as a fuel material is considered the next most appropriate in terms of the waste hierarchy.

- 4.8 Waste fuel is considered a renewable resource by Planning Policy Statement 1: Planning and Climate Change. EU Directive 2009/28/EC on the promotion of the use of energy from renewable sources requires EU member states to take appropriate steps to encourage greater consumption of energy from renewable energy sources. The Directive includes a UK target of 15% of energy from renewable sources by 2020. In addition, The Renewable Energy Strategy 2009 sets out ambitious lead scenarios, including more than 30% of electricity generated from renewables. Consequently the proposed development will not only help to secure Brunner Mond's future viability in Northwich but will also help the UK to meet its landfill and renewable energy requirements.
- 4.9 The proposed sustainable energy plant would also benefit from excellent transport links. It is expected that approximately two-thirds of the waste fuel would arrive by rail, reducing not only the impact on the local road network but also the greater carbon emissions associated with road transport.
- 4.10 It is also important to point out that CWACC itself has undertaken a sustainability appraisal of the waste local plan and in which this site is allocated. The Council has decided that the site is appropriate in terms of land use and location.

Traffic and Congestion

- 4.11 50% of the objections received raised some concern regarding the potential impact that the proposed development could have on the levels of traffic on local roads and the corresponding effect on road/pedestrian safety. Chapter 7 of the submitted Environmental Statement examines the potential environmental effects of the potential increase in traffic and the submitted Transport Assessment examines the effect on the roads and congestion. The Transport Assessment concludes that there will be no significant effect on local traffic flows. On the majority of local roads, even under a worst case scenario (whereby all waste fuel is transported by road and all staff travel by car) it is calculated that there will be less than a 1% increase in traffic flows on minor local roads whilst on the A530 south of

the site access, even under a worst case scenario, the increase would be a maximum of 3.4%. Operational assessments based on worst case assumptions with all staff driving to the site, all waste transported by road and the site operating at capacity show that the proposed development leads to some increases in queues and delays at the Middlewich Road and A530/A556 junctions. However, given the low absolute increases in vehicular flows at these junctions these increases are not considered to be material. The assessment found that the level of impact is significantly reduced if as intended a significant proportion of the waste is imported by rail.

4.12 A couple of objections cited potential problems surrounding the access of the site by HGVs as a result of height restrictions relating to the Griffiths Road railway bridge. These restrictions were considered as part of the Transport Assessment and no HGVs are proposed to be routed along this section of Griffiths Road. The assessments are based on all HGVs travelling to and from the south of the site on Griffiths Road.

4.13 Following submission of the application to DECC in February 2010, a change to the staff shift patterns has been proposed. These changes result from the increased proportion of administrative staff anticipated to be necessary to help operate the proposed facility. Consequently, an assessment of the proposed staff shift pattern changes has been carried out and this document is included in Appendix I of the Environmental Statement Addendum. This assessment concludes that the changes to staff shift patterns are very minor and will have no significant effect on the anticipated traffic flows demonstrated in the submitted Transport Assessment. The Highways Agency has also not raised an objection to the proposed development since they consider that there will be no significant effects on trunk roads under their jurisdiction. Comments from CWACC's Highways Department which are responsible for overseeing local roads are still awaited.

Inappropriate Location

4.14 Exactly one-third of objectors have commented that the specific site on which the energy plant is proposed is inappropriate rather than the proposed development in general. The reasons cited generally reference all other reasons addressed in this chapter. Chapter 4 of the submitted Environmental Statement outlines the alternatives considered during the initial design and feasibility stage. The primary requirement of Brunner Mond from the energy plant is the heat output necessary to produce sodium bicarbonate and soda ash. However, steam cannot be transported significant distances and it is most energy and environmentally efficient to have the source of the heat as close as possible to the end user (Brunner Mond). The other site owned by Brunner Mond is located at Winnington, approximately 3 miles away from the proposed development site. This Winnington facility has an existing Combined Heat and Power (CHP) facility that provides power to the Lostock plant but it is still reliant on fossil fuels and is not as environmentally sustainable a solution as the proposed SEP. In fact the proposed energy plant is actually a high quality CHP that provides both heat

and power whilst utilising a renewable energy source without the financial uncertainty that is characteristic of the use of significant amounts of fossil fuel. The Lostock site was considered preferable to land available at Winnington, since there are existing rail links serving the site, better and more established road access routes, more land available. The proposed SEP would be located on the site of a former coal fired power station and the site is allocated for waste treatment uses in the Cheshire Replacement Waste Local Plan. Consequently it was considered that this site was the most appropriate site available to Brunner Mond for the construction of an energy plant both in terms of efficiency of energy output and sustainability.

Flooding/Drainage and Land Contamination

- 4.15 12% of objections raised some concern regarding the potential effect that the proposed development might have on flood risk and land contamination. Chapter 11 of the Environmental Statement addresses land contamination and geology and explains that the site currently has a moderate level of contamination resulting from production of various chemicals dating back to the late nineteenth century. Land contamination assessments have been carried out to determine the levels of various contaminants to assist in the detailed construction and design process. The removal of significant amounts of contaminants as part of the construction of the proposed energy plant is considered to result in an improvement to the quality of the land both in the site and its immediate surroundings. The Environment Agency has suggested conditions to DECC to ensure construction and detailed design work is in accordance with their standards and regulations.
- 4.16 A Flood Risk Assessment (FRA) has been carried out to assist in the development of the scheme and can be found in Chapter 10 of the submitted Environmental Statement. The FRA concludes that, as a result of the installation of a proposed high quality drainage system the development will actually reduce the flood risk of the site. The site is categorised as Flood Zone 1 by the Environment Agency which means that it has a very low probability of flooding and corresponding the Environment Agency has raised no objection to the scheme, subject to confirming details of the drainage system proposed via conditions attached to a potential permission. Consequently, contrary to some of the comments raised by objectors, the proposed development is considered to actually improve the quality of land within the site and also reduce wider flood risk.

Ecology

- 4.17 9.5% of objections have raised concern over the potential impact on ecological sites resulting from emissions from the proposed energy plant. Chapter 6 of the Environmental Statement explained that a number of ecology surveys of protected surveys had not been completed at the time of the submission of the application back in February 2010. Additional surveys have now been submitted as part of the Addendum to the Environmental Statement (Appendices 3, 4 and 5). All surveys demonstrate that there is no significant impact on protected species resulting from the proposed

development and recommends a number of mitigation measures that can be secured by a condition if permission were granted. In addition, Chapter 6 of the Environmental Statement found that effects on ecology resulting from traffic and human activity are unlikely given the current use of the site by Brunner Mond and the other surrounding industry. Consequently it is considered that there will be no significant adverse on-site ecological impacts resulting from the proposed development.

- 4.18 An assessment of the impact of the proposed development on nationally and internationally designated sites within a 15km radius of the site was carried out. The figure of 15km was recommended by Natural England following pre-application discussions. An individual and cumulative analysis was carried out on all sites agreed by Natural England and the report can be found in Appendix x of the Environmental Statement Addendum. The assessments confirm that there will be insignificant effects on all designated sites within this radius with the effects declining with greater distance from the site. Designated sites more than 15km from the site are not considered to be affected. It is therefore considered that impact on ecology resulting from the proposed development will be insignificant.

Visual Impact

- 4.19 7% of objections raised by third parties to the potential visual impact of the proposed energy plant in particular citing the visual prominence of the plant and its associated buildings/structures. Chapter 8 of the Environmental Statement explains that the proposed industrial redevelopment would be at least partly on the footprint of an existing derelict coal fired power station and surrounded by many large industrial buildings within the Griffith's Road area with the proposed stacks extending to the same height as those previously existing. Following the submission of the application to DECC in February 2010, a number of small design alterations have been proposed and these revised drawings have been submitted to DECC along with this document. A revised Landscape and Visual Impact Chapter 8 can be found in the Environmental Statement Addendum. The proposed changes are considered to be in character with the scheme originally proposed and do not increase the size of the proposed development or its prominence. Consequently it is considered that the proposed development is in character with its surroundings both in appearance, form and scale and would not result in the loss of any key landscape elements due to its predominantly urban surroundings.

Noise and Disturbance

- 4.20 6% of objections expressed concern over the potential impact on amenity as a result of the proposed development. Chapter 12 of the Environmental Statement assessed the potential effects of the proposed energy plant in terms of noise and vibration. It was concluded that significant noise and vibration effects would not be likely to occur during construction, operation and decommissioning of the energy plant, whether developed individually or in combination with committed development in the area, provided that the design of the plan incorporates appropriate cladding. The proposed energy

plant is proposed to be clad with noise dampening material and this is proposed to be agreed via condition on a potential permission.

4.21 One objection raised concern over the potential noise impact resulting from the use of the Northwich-Sandbach branch line (NSBL) by fuel delivery trains. RPS commissioned an assessment of the potential impact of the proposed development on the amenity of residents in close proximity to this rail line. The NSBL is currently only used for freight services and a diversionary route for passenger services while the main West Coast Main Line is undergoing engineering works though there are campaigns to reinstate a passenger service. In order to generate a robust assessment of the potential noise/vibration effects resulting from the potential increase in rail traffic, the assessment also included the proposed Viridor development for a waste treatment development on the neighbouring site at Lostock Gralam which would likely result in a small number of rail movements on this line each day. The assessment concluded that there would be no significant increase in noise/vibration resulting from the proposed energy plant either during the day or night and consequently that the proposed development would not significantly adversely effect the residential amenity of residents adjacent to the NSBL.

4.22 Concern was raised in a small number of objections that the proposed development could create an unpleasant odour that would impact upon the amenity of nearby residents. The large separation distance between the SEP and the nearest residential receptors is anticipated to ensure that the risk of odour nuisance would be low and effects were considered in the Environmental Statement to be of neutral significance. Any odours that may occur are likely to be confined to delivery of the fuel and, therefore, would be localised and of short duration

Reduction in Property/Land Values

4.23 A small proportion of objectors, 4.5%, were concerned that the proposed development could have an adverse effect on the value of nearby property and land. The impact of proposed developments on land values is not a material planning consideration. However, a number of studies have been undertaken in the Republic of Ireland which have demonstrated that, whilst initially there may be a relatively small reduction in property values following construction of an energy plant, after a small number of years it was found that the property/land values reverted to their original value relative to other unaffected areas.

Insufficient Consultation

4.24 A very small minority of objections, approximately 2%, commented that the level of consultation was inadequate, particularly with neighbouring land owners/operators. The proposed development was advertised and consulted on in excess of the requirements set out by DECC. The proposals were published in both local and national newspapers for greater than 28 days (the period required by

DECC), on-site notices were erected to further publicise the development (also required by DECC), a public exhibition was organised by Brunner Mond and E.ON in Northwich in February 2010 just prior to the submission of the application and all neighbouring business owners were sent copies of the plans and associated application documents in an effort to keep them informed. The latter two elements of the consultation process exceeded the requirements of DECC and were undertaken in an attempt to engage with the local community since Brunner Mond is an historic local employer that wishes to continue to contribute to Northwich. The significant number of representations received by DECC is in itself compelling evidence that consultation with the local community has been extensive and that it is unlikely that many local stakeholders were unaware of the development proposals.

- 4.25 However, following submission of the revised documentation in September 2010 there will be an addition period of consultation with both members of the public and the statutory consultees detailed earlier in this report. The proposed development will once again be publicised in the local and national press, with on-site notices and through a number of public exhibitions and community leaflets. Therefore those members of the public that did not get the opportunity to make representations during the original consultation period in April/May 2010 will get a further opportunity which should ensure that the whole community has had the potential to express their opinions on the proposed energy plant at Lostock.

5 Conclusion

- 5.1 A significant level of consultation has taken place so far both fulfilling and exceeding the requirements for an applicant under DECC's regulations. A large number of representations were received in response to the proposed development. There will be a further period of consultation during September and October 2010 following the submission of additional information (of which this document is a part).
- 5.2 The statutory consultees have, in general, been very supportive of the proposed development. Efforts have been made to address some of the initial concerns raised by Natural England and it is hoped that the additional information submitted will provide the information NE requires in order to be able to appropriately assess the scheme. The recommendation from CWACC is currently being awaited by DECC and it is hoped that the additional information submitted will aid in their determination of the application.
- 5.3 A range of issues have been raised by third parties in response to the application and it is hoped that this document helps to allay their concerns as part of efforts by the applicants to help engage and inform the local community of their proposals given the shared history of Brunner Mond and Northwich, a town in which Brunner Mond hopes to be able to remain, with the proposed energy plant helping to ensure its future economic viability.

Appendices

Appendix I

Summary Spreadsheet Identifying Key Issues Raised During Consultation Period

Appendix 2

Spreadsheet Identifying Third Party Objections Received by DECC