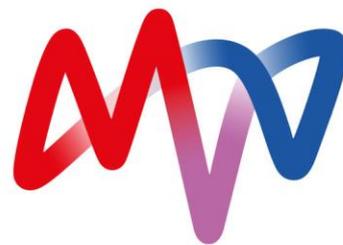


# Medworth Energy from Waste Combined Heat and Power Facility

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## Project Benefits Report

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Infrastructure Planning (Applications:  
Prescribed Forms and Procedure)  
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# Executive Summary

The Proposed Development is a Nationally Significant Infrastructure Project (NSIP) under Part 3 Section 14 of the Planning Act 2008. As such national policy most relevant to the consideration of the application for the Proposed Development is contained within the Overarching National Policy Statement for Energy EN-1 (2011) and within NPS EN-3 and EN-5. In 2021 government issued draft NPS for consultation. The draft NPS NE-1, EN-3 and EN-5 are also of relevance where they deviate from the adopted policy.

Government has clearly articulated within both the adopted NPS and draft NPS the urgent need for new energy infrastructure for the decarbonisation of the UK's power generation and recognises that the by-products of low carbon energy production can be used directly to support local businesses and homes to decarbonise. The British Energy Security Strategy 2022 stresses the importance of greater self-sufficiency (energy security).

The Proposed Development responds to national energy policy in that it would generate up to 55MW of electricity into the national grid, sufficient to power 118,918 homes based per annum and to meet the equivalent electrical demand of almost all homes in Fenland and Kings Lynn West Norfolk (45,640 and 74,240 respectively). In addition, by managing waste which would otherwise be landfilled, the Proposed Development would deliver an estimated 2,571ktCO<sub>2</sub>e saving over its lifetime when compared to a base case which is that this waste would continue to be landfilled.

National energy policy provides a clear direction that notwithstanding the energy benefits which arise from EfW, an EfW's facility's primary purpose is to move waste up the waste hierarchy, and away from landfill. The Applicant has prepared a Waste Fuel Availability Assessment. This concludes that within the Study Area there will be a shortfall in available management facilities to accommodate waste other than by landfill of approximately 1.9 million tonnes up to 2030 reducing to approximately 1.8 million tonnes by 2035. Nationally, there would be a minimum shortfall of approximately 2.8 million tonnes of residual HIC capacity should government recycling targets be met. Currently Norfolk County Council (NCC) transports most of its residual waste to Bedfordshire, which the UK continues to export waste for management abroad. The Proposed Development therefore delivers project benefits in the context of moving waste up the waste hierarchy and supports the principle of proximity in the treatment of waste.

The Proposed Development does not fall within the thresholds identified by national energy policy whereby CHP is mandated, however the Applicant is confident there are opportunities available to it to deploy CHP and therefore the Proposed Development includes a CHP Connection as part of the application. The presence of potential heat and power customers was a key factor when selecting the location for the Proposed Development. The Applicant has therefore included within the application the construction and operation of a CHP Connection and has commissioned a CHP Assessment to identify customer opportunities and demonstrate the viability of this element of the Proposed Development. CHP would deliver project benefits associated with reductions in CO<sub>2</sub> emissions which would be in addition to the savings identified above.



Demonstrating sustainable design, the Proposed Development also delivers ecological, socio-economic and educational project benefits secured through documents such as the Outline Employment and Skills Strategy and through a landscape design which maximises habitat creation appropriate to the local area committing to a net gain in biodiversity.



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# 1. Introduction

## 1.1 Overview of the Proposed Development

1.1.1 Medworth CHP Limited (the Applicant) is applying to the Secretary of State (SoS) for a Development Consent Order (DCO) to construct operate and maintain an Energy from Waste (EfW) Combined Heat and Power (CHP) Facility on the industrial estate, Algores Way, Wisbech, Cambridgeshire. Together with associated Grid Connection, CHP Connection, Access Improvements, Water Connections, and Temporary Construction Compound (TCC), these works are the Proposed Development.

1.1.2 The Proposed Development would recover useful energy in the form of electricity and steam from over half a million tonnes of non-recyclable (residual), non-hazardous municipal, commercial and industrial waste each year. The Proposed Development has a generating capacity of over 50 megawatts and the electricity would be exported to the grid. The Proposed Development would also have the capability to export steam and electricity to users on the surrounding industrial estate. Further information is provided in **Chapter 3: Description of the Proposed Development (Volume 6.2)**.

1.1.3 The Proposed Development is a Nationally Significant Infrastructure Project (NSIP) under Part 3 Section 14 of the Planning Act 2008 (2008 Act) by virtue of the fact that the generating station is located in England and has a generating capacity of over 50 megawatts (Section 15(2) of the 2008 Act). It, therefore, requires an application for a DCO to be submitted to the Planning Inspectorate (PINS) under the 2008 Act. PINS will examine the application for the Proposed Development and make a recommendation to the SoS for Business, Energy and Industrial Strategy (BEIS) to grant or refuse consent. On receipt of the report and recommendation from PINS, the SoS will then make the final decision on whether to grant the Medworth EfW CHP Facility DCO.

## 1.2 The Applicant and MVV

1.2.1 The Applicant is a wholly owned subsidiary of MVV Environment Limited (MVV). MVV is part of the MVV Energie AG group of companies. MVV Energie AG is one of Germany's leading energy companies, employing approx. 6,500 people with assets of around €5 billion and annual sales of around €4.1 billion. The Proposed Development represents an investment of approximately £450m.

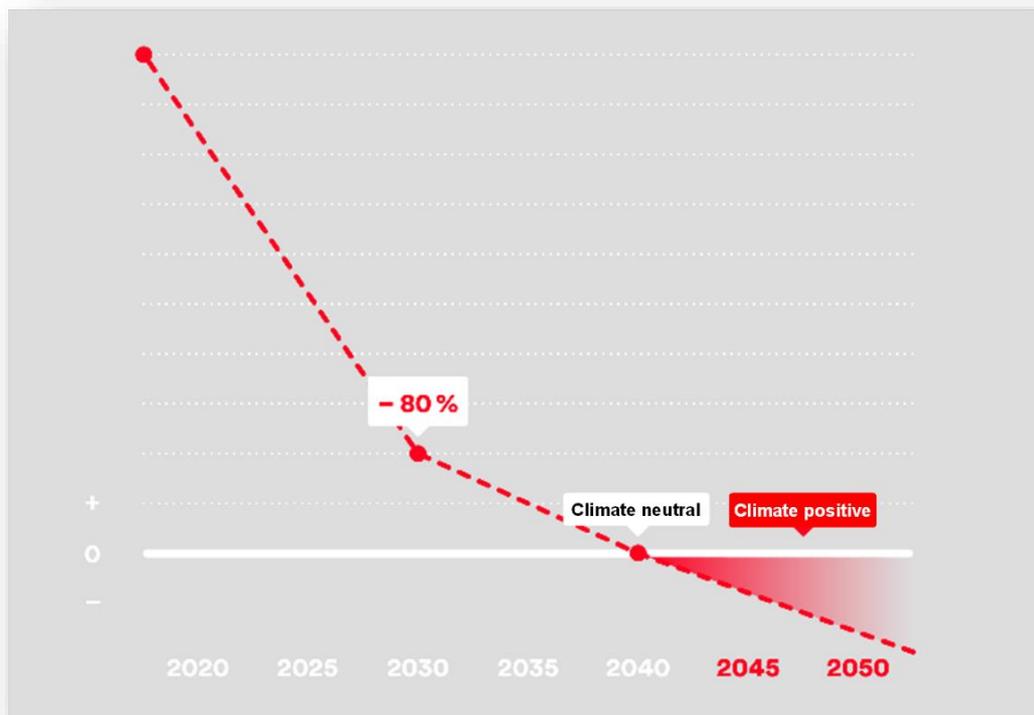
1.2.2 The company has over 50-years' experience in constructing, operating, and maintaining EfW CHP facilities in Germany and the UK. MVV Energie's portfolio includes a 700,000 tonnes per annum residual EfW CHP facility in Mannheim, Germany.

1.2.3 MVV Energie has a growth strategy to be carbon neutral by 2040 and thereafter carbon negative, i.e., climate positive. Specifically, MVV Energie intends to:



- Reduce its direct CO2 emissions (Scope 1) by over 80% by 2030 compared to 2018;
- Reduce its indirect CO2 emissions (Scope 2 and 3) by 82% compared to 2018;
- be climate neutral by 2040; and
- be climate positive from 2040.

**Graphic 1.1: MVV Energie climate growth strategy targets**



- 1.2.4 MVV's UK business retains the overall group ethos of 'belonging' to the communities it serves whilst benefitting from over 50 years' experience gained by its German sister companies. In the UK, MVV currently consists of six separate companies (see **Table 1.1 MVV Environment UK Group of Companies**).
- 1.2.5 MVV's largest project in the UK is the Devonport EfW CHP Facility in Plymouth. Since 2015, this modern and efficient facility has been using around 265,000 tonnes of municipal, commercial and industrial residual waste per year to generate electricity and heat, notably for Her Majesty's Naval Base Devonport in Plymouth, and exporting electricity to the grid.
- 1.2.6 In Dundee, MVV has taken over the existing Baldovie EfW Facility and has developed a new, modern facility alongside the existing facility. Operating from 2021, it uses up to 220,000 tonnes of municipal, commercial and industrial waste each year as fuel for the generation of usable energy.
- 1.2.7 Biomass is another key focus of MVV's activities in the UK market. The biomass power plant at Ridham Dock, Kent, uses up to 195,000 tonnes of waste and non-



recyclable wood per year to generate green electricity and is capable of exporting heat.

**Table 1.1 MVV Environment UK Group of Companies**

| Company                                  | Detail  |
|--|---|
| <b>Medworth CHP Limited</b>              | The wholly owned subsidiary of MVV Environment Limited proposing to submit the application for the DCO (the Applicant).   |
| <b>MVV Environment Limited</b>           | The company developing and funding the Proposed Development.  |
| <b>MVV Environment Limited Baldovie</b>  | Energy from Waste CHP Facility, diverting up to 220,000 tonnes per annum of residual waste from landfill for Dundee and Angus Councils and for private waste disposal companies.        |
| <b>MVV Environment Limited Devonport</b> | Energy from Waste CHP Facility, diverting 265,000 tonnes per annum of residual waste from landfill for the South West Devon Waste Partnership and for private waste disposal companies. |
| <b>MVV Environment Limited Ridham</b>    | Merchant biomass facility generating energy up to 195,000 tonnes per annum of waste wood.   |
| <b>MVV Environment Limited Services</b>  | The UK electricity trading subsidiary of MVV.   |

## 1.3 The Proposed Development

1.3.1 The Proposed Development comprises the following key elements:

- The EfW CHP Facility;
- CHP Connection;
- Temporary Construction Compound (TCC);
- Access Improvements;
- Water Connections; and
- Grid Connection.

1.3.2 A summary description of each Proposed Development element is provided below. A more detailed description is provided in **ES Chapter 3: Description of the Proposed Development (Volume 6.2)** of the ES. A list of terms and abbreviations can be found in **Chapter 1 Introduction, Appendix 1F Terms and Abbreviations (Volume 6.4)**.

- **EfW CHP Facility Site:** A site of approximately 5.3ha located south-west of Wisbech, located within the administrative areas of Fenland District Council and Cambridgeshire County Council. The main buildings of the EfW CHP Facility would be located in the area to the north of the Hundred of Wisbech Internal



Drainage Board (HWIDB) drain bisecting the site and would house many development elements including the tipping hall, waste bunkers, boiler house, turbine hall, air cooled condenser, air pollution control building, chimneys and administration building. The gatehouse, weighbridges, 132kV switching compound and laydown maintenance area would be located in the southern section of the EfW CHP Facility Site.

- **CHP Connection:** The EfW CHP Facility would be designed to allow the export of steam and electricity from the facility to surrounding business users via dedicated pipelines and private wire cables located along the disused March to Wisbech railway. The pipeline and cables would be located on a raised, steel structure.
- **TCC:** Located adjacent to the EfW CHP Facility Site, the compound would be used to support the construction of the Proposed Development. The compound would be in place for the duration of construction.
- **Access Improvements:** includes access improvements on New Bridge Lane (road widening and site access) and Algores Way (relocation of site access 20m to the south).
- **Water Connections:** A new water main connecting the EfW CHP Facility into the local network will run underground from the EfW CHP Facility Site along New Bridge Lane before crossing underneath the A47 (open cut trenching or horizontal directional drilling (HDD)) to join an existing Anglian Water main. An additional foul sewer connection is required to an existing pumping station operated by Anglian Water located to the northeast of the Algores Way site entrance and into the EfW CHP Facility Site.
- **Grid Connection:** This comprises a 132kV electrical connection using underground cables. The Grid Connection route begins at the 132kV switching compound in the EfW CHP Facility Site and runs underneath New Bridge Lane, before heading north within the verge of the A47 to the Walsoken Substation on Broadend Road. From this point the cable would be connected underground to the Walsoken DNO Substation.

## 1.4 Purpose of this document

1.4.1 The purpose of this document is to summarise the policy and legislative drivers which have informed the definition, evolution and design of the Proposed Development and the benefits which result. Relevant policy is to be found first and foremost within National Policy Statements (NPS) and the likely direction of future policy within the draft NPS's which were issued for consultation in September 2021. These national policy documents identify a national need for facilities such as the Proposed Development. National policy is one means of delivering government's legislative agenda which, relevant to the Proposed Development, seeks to reduce waste to landfill and to extract renewable energy from the residual waste which is burnt as fuel. Government legislation and policy is also concerned with energy security, economic, environmental and social good. This is described and the benefits of the Proposed Development evidenced within this document.

1.4.2 The structure of the document is as follows:



- 1.4.3 **Section 2** presents the national policy need for major renewable energy infrastructure, and emerging national policy in the form of the draft NPS. In addition, it identifies relevant policy and legislation concerned with environmental protection and enhancement, the benefits of reducing carbon emissions and economic development.
- 1.4.4 **Section 3** identifies the need for facilities to recover residual waste and demonstrates how the Proposed Development delivers sustainable waste management consistent with national policy.
- 1.4.5 **Section 4** identifies the benefits of the Proposed Development in reducing carbon emissions including the delivery of low carbon, combined heat and power (CHP) to surrounding commercial businesses.
- 1.4.6 **Section 5** identifies the wider environmental and socio-economic benefits delivered by the Proposed Development consistent with national policy.
- 1.4.7 **Section 6** concludes with a summary of the Proposed Development and its benefits.



## 2. The Policy Framework for Nationally Significant Energy Infrastructure

### 2.1 Introduction

2.1.1 This section identifies and summarises the relevant national policy drivers for nationally significant energy infrastructure. It takes as its starting point adopted national policy in the form of the relevant NPS supplemented by the government's consultation drafts published in September 2021 where they expand upon or differ from the adopted documents. This section then identifies and summarises other government policy and legislation relevant to the Proposed Development, namely policy and legislation aimed at moving waste up the waste hierarchy, energy security, economic and environmental agenda. The **Planning Statement (Volume 7.1)** provides a full review of relevant planning policy.

### 2.2 National Policy Statements

2.2.1 The Proposed Development is a NSIP and a renewable energy development as it would have the capacity for generating more than 50MW of electricity from residual waste. National policy most relevant to the consideration of the application for the Proposed Development is contained within the following documents:

- The Overarching National Policy Statement for Energy EN-1 (2011).
- The National Policy Statement for Renewable Energy Infrastructure EN-3 (2011).

2.2.2 The Proposed Development includes an underground Grid Connection. The following national policy is also relevant:

- The National Policy Statement for Electricity Networks EN-5 (2011).

2.2.3 In 2021 government issued draft NPS for consultation. The following are also of relevance where they deviate from the adopted policy listed above:

- The Draft Overarching National Policy Statement for Energy EN-1 (2021).
- The Draft National Policy Statement for Renewable Energy Infrastructure EN-3 (2021).
- The Draft National Policy Statement for Electricity Networks EN-5 (2021).

2.2.4 When assessing an application for development consent, the SoS must also have regard to the local impact report any other matters which the SoS thinks are both important and relevant to the decision. Such matters may include other national strategies and policy as well as the policies of the relevant local authorities.



### *Overarching National Policy Statement for Energy EN-1*

- 2.2.5 Part 3 of NPS EN-1 establishes the national need for new nationally significant energy infrastructure. Section 3.4 considers the role of renewable electricity generation and reflects that the government (in 2009) committed to sourcing 15% of its total energy from renewable sources by 2020, but also recognising Committee on Climate Change advice on future (i.e., post 2020) possible pathways towards maximising renewables contribution to carbon reduction targets in 2050. Section 3.4 recognises that large-scale deployment of renewables can help the UK to tackle climate change and can support economic development in the form of new jobs generated in the renewable sector. It also states that by maximising renewables the UK improves its energy security by reducing reliance on the use of coal, oil and gas supplies to keep the lights on and power businesses. It refers to post 2020 commitments and advice on measures to continue to increase renewable energy deployment.
- 2.2.6 A form of renewable energy recognised by NPS EN-1 is Energy from Waste (EfW) although the principal purpose of this process is to reduce the amount of waste going to landfill in accordance with the waste hierarchy. With regard to energy security, there is recognition in NPS EN-1 (paragraph 3.4.4) the EfW can provide peak load and base load electricity on demand which is of increasing importance as the UK's electricity energy generation contains an increasing proportion of more intermittent wind and solar generation. The NPS concludes that the ability of EfW (and biomass) to deliver predictable, controllable electricity is increasingly important in ensuring the security of energy supplies.
- 2.2.7 Paragraph 3.4.5 summarises the government's position that to largely decarbonise the power sector by 2030 it is necessary to bring forward renewable electricity generating projects as soon as possible and that there is therefore an urgent need.
- 2.2.8 A key component of the Proposed Development is the CHP Connection which forms part of the application for which consent is sought. NPS EN-1 recognises at paragraph 4.6.1 that a 'CHP station' may supply steam to customers after it has been used to drive electricity generating turbines (as in the case of the Proposed Development), and at paragraph 4.6.3 that using less fuel to generate the same amount of heat and power reduces emissions. The NPS recognises that to be economical the generating station needs to be located close to industrial or domestic customers with heat demands.

### *Draft Overarching National Policy Statement for Energy EN-1 Sept 2021*

- 2.2.9 This draft document updates the need for nationally significant energy projects based upon government policy and legislation introduced since the adoption of NPS EN-1 in 2011. As such it refers to the 2020 Energy White Paper and also the importance of boosting growth and productivity, levelling up through investment and the importance of the pathway to meet net zero carbon emissions by 2050.
- 2.2.10 Since 2011 the impacts of climate change and the importance of reducing carbon emissions has increased further up the national and international agenda. The Draft NPS recognises that the original iteration of EN-1 was written when the UK had a GHG emission reduction target of 80 per cent (from 1990 levels) by 2050. However, in 2019, the UK became the first major economy to legislate for a 2050 net zero



GHG emission target and has set carbon budgets that aim to reduce GHG emissions by 68% by 2030 and by approximately 78% by 2035. Reference is also made to the intention to publish a net zero strategy ahead of COP26<sup>1</sup>.

- 2.2.11 A number of measures are referred to under the sub-heading of meeting net zero (Section 2.3). Relevant to the Proposed Development are those which include the greater use of electricity to reduce emissions in areas such as transport, heating and industry as well as the importance of breaking down silos of separate heat, transport and electricity networks.
- 2.2.12 The Draft NPS tackles the issue of energy security (paragraphs 2.4.6 to 2.4.10) stating that it is important the UK's supply of energy remains secure, reliable and affordable. Section 2.5 links government energy policy with sustainable development recognising the need to take urgent action to combat climate change and to ensure access to affordable, reliable, sustainable and modern energy for all, building infrastructure which is resilient, promoting inclusive and sustainable industrialisation and fostering innovations (UN's 2030 Agenda for Sustainable Development).
- 2.2.13 Draft NPS Part 3 establishes the need for significant amounts of new nationally significant energy infrastructure projects and begins by setting out that the government sees the need for such projects but also recognises that it will not be possible to develop the necessary amounts without some significant residual adverse impacts.
- 2.2.14 Paragraph 3.2.6 states that the SoS should give substantial weight to this need when considering applications for development consent, however the SoS is not required to consider separately the specific contribution of any individual project to satisfying the need established in the NPS. All applications for development consent for the types of infrastructure covered by the energy NPSs are to be approached on the basis that the government has demonstrated that there is a need for those types of infrastructure.
- 2.2.15 Paragraph 3.3.20 states that there is an urgent need for new electricity generating capacity to meet the UK's energy objectives. Reference is made to the importance of wind and solar, of energy storage to help balance out these intermittent generators and the role of combustion power stations which are recognised as providing dispatchable generation when output from intermittent renewables is low.
- 2.2.16 Paragraph 3.3.33 considers the role of EfW recognising that they operate at 90%+ availability and that their principal purpose is to reduce the amount of waste going to landfill, and to recover energy from that waste as electricity or heat. The Draft NPS recognises that while EfW produce residual emissions, energy recovery from residual waste has a lower GHG impact than landfill. The Draft NPS suggests that the amount of waste available as a fuel is set to reduce further by 2035 as a result of government policy referencing the Circular Economy Package policy statement.
- 2.2.17 Paragraph 3.3.61 confirms that given the need for new electricity infrastructure expressed within the Draft NPS there is an urgent need for new (and particularly low

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<sup>1</sup> The Net Zero Strategy was published in October 2021



carbon) electricity NSIPs to be brought forward as soon as possible, given the crucial role of electricity as the UK decarbonises its economy.

### *National Policy Statement for Renewable Energy Infrastructure EN-3*

- 2.2.18 The purpose of the policy document is to provide assessment principles and technology-specific information in relation to the consideration of application for nationally significant renewable energy projects. It cross-references with EN-1 in paragraph 1.3.1 referencing the need and urgency for new energy infrastructure referenced within that document and specific to biomass and waste combustion at paragraph 2.5.2 recognises that the recovery of energy from waste, where in accordance with the waste hierarchy will play an increasingly important role in meeting the UK's energy needs.
- 2.2.19 Section 4.7 maintains policy recognition of the benefits of CHP consistent with the adopted NPS.

### *Draft National Policy Statement for Renewable Energy EN-3*

- 2.2.20 Consistent with the adopted NPS, draft NPS EN-3 refers to the relationship with EN-1 (draft) and the need and urgency for new energy infrastructure to be consented and built to ensure the UK's supply of energy always remains secure, reliable, affordable, and consistent with net zero emissions in 2050. At paragraph 2.1.2 reference is made that the SoS should act on the basis that the need for infrastructure covered by this NPS (Draft NPS EN-3) has been demonstrated. Consistent with the adopted NPS the document provides assessment principles and technology-specific information in relation to the consideration of application for nationally significant renewable energy projects.

### *National Policy Statement for Electricity Networks infrastructure EN-5 and the Draft National Policy Statement EN-5.*

- 2.2.21 A key component of the Proposed Development is the Grid Connection. This allows for the export of electricity to the national grid and enables the Proposed Development to contribute to the national need for base load electricity both to meet the rising demand for electricity and balance the increasing proportion of electricity generation which is intermittent by nature (wind and solar).
- 2.2.22 NPS EN-5 and the Draft NPS EN-5 provide the assessment principles and technology-specific information relevant to the consideration of an application for a new electricity network. Consistent with NPS EN-3 and the Draft NPS EN-3 both the adopted and draft NPS cross reference back to NPS EN-1 and the need and urgency for new energy infrastructure referenced therein.

## 2.3 Legislation and other relevant policy

- 2.3.1 The NPS's referenced above refer to the wider drivers of government policy relevant to the nationally significant infrastructure they consider. Reference is made therefore to the Climate Change Act 2008 and the carbon budgets which flow from it. The Draft NPS's, particularly NPS EN-1 provide a more up to date review of relevant policy that the adopted documents. Reference is made to the Energy White Paper:



Powering our Net Zero Future 2020 which recognises the need to act urgently to reduce the future impacts of climate change and change dramatically the use of fossil fuels in order to achieve net zero by 2050. The White Paper also recognises the importance of heat networks and commits to using a new heat Network Transformation Programme to co-ordinate and support the roll-out of district heating systems including the switch to low or zero carbon heat sources.

- 2.3.2 The White Paper support for heat networks builds upon the government's earlier publication of the Clean Growth Strategy 2017 which recognised the importance that such networks can have for both homes and businesses.

## The British Energy Security Strategy

- 2.3.3 Published in April 2022 the strategy sets out the objective to secure clear and affordable British energy for the long term, recognising the substantial increase in energy prices and the continuing changes within an energy market, which is looking to transition to zero carbon whilst ensuring that fuel remains affordable. The strategy aims to build an energy system that is more self-sufficient and promotes, in tandem with renewables, proposals to invest in nuclear power to provide the necessary baseload. The strategy intends that by 2030 95% of British electricity could be low carbon and fully decarbonised by 2035 as part of a transition to reduce dependency on imported oil and gas.

## Local Strategies and Policies

- 2.3.4 Consistent with national policy the relevant local authorities have prepared strategies and policies that recognise the threat of climate change and the changing environment and the need to address such changes.

### *Cambridgeshire Climate Change and Environment Strategy 2022*

- 2.3.5 Whilst focused upon how the Council operates, the Net Zero Cambridgeshire 2045 forms the Council's Climate Change and Environment Strategy 2022 and sets out the ambition to be net zero by 2045.

### *Norfolk Environmental Policy 2019*

- 2.3.6 Informed by UK government's Environmental Plan 2018 it recognises the increasing influence that climate change has on all aspects of the environment with the policy reflecting the Council's value in protecting and maintaining the health of Norfolk's environments.

## 2.4 The Project Benefits relative to the Policy Framework for Nationally Significant Energy Infrastructure

- 2.4.1 Government has clearly articulated within both the adopted NPS and draft NPS the urgent need for new energy infrastructure for the decarbonisation of the UK's power generation, and the recognition that the by-products of low carbon energy production can be used directly to support local businesses and homes to decarbonise.



- 2.4.2 The UK energy sector continues to face several challenges which include an increased demand for energy particularly electricity, a requirement to move away from fossil fuel energy generation to low carbon and renewable supplies and a need to switch to the use of electricity for heating away from fuels such as natural gas and coal for heating. Very recently the importance of affordable energy given the continued increase in energy process and of greater self-sufficiency (energy security) has risen in prominence.
- 2.4.3 National policy attempts to respond to these challenges by establishing the urgent need for new energy infrastructure and identifying the energy sectors which can best drive forward government policy towards net zero by 2050. At the same time, ensure that society can continue to maintain and improve its quality of life while protecting and enhancing the natural environment.

### Meeting the increase demand for electricity

- 2.4.4 The Proposed Development would generate up to 55MW electricity into the national grid. This electricity would be generated using residual waste as a fuel stock and would operate at approximately 90% efficiency such that it would provide a consistent baseload. The British Energy Security Strategy has a clear focus upon developing greater self-sufficiency within the national energy system. It also recognises that a key part of this is the balance to be struck between what is often zero carbon, renewable energy which is intermittent and the baseload (the strategy uses the context of nuclear). The Proposed Development is a renewable energy source which is not intermittent. Recognised by national policy, EfW facilities operate at over 90% efficiency meaning that EfW technologies provide reliable, baseload energy. The importance of baseload is increasingly recognised as a means of ensuring that there remains sufficient electricity at times of low wind and/or days with low levels of sunlight, times when wind and solar farms produce lower levels of electricity. This is a clear project benefit.
- 2.4.5 An alternative means of quantifying the amount of energy generated is to compare it to the amount of electricity used by an average household using data on domestic electricity usage provided by BEIS<sup>2</sup>. Generating 55MW of electricity net and using the average mean household electricity consumption figure of 3,700kwh, the Proposed Development would generate electricity sufficient to power 118,918 homes per annum based upon its assumed level of efficiency (load factor). This amount of electricity is the equivalent electrical demand of almost all homes in Fenland and King's Lynn West Norfolk (45,640<sup>3</sup> and 74,240<sup>4</sup>, respectively).

### Moving towards net zero

- 2.4.6 The Proposed Development displays other project benefits which align with relevant government policy. Categorised as renewable energy, the Proposed Development supports the UK in transitioning to net zero. The Environmental Statement **Chapter 14: Climate (Volume 6.2)** presents the carbon emission calculations relative to the Proposed Development. It concludes that against the current situation of landfilling

<sup>2</sup> BEIS. National Energy Efficiency Data-Framework (NEED): Summary of Analysis, Great Britain, 25 June 2020

<sup>3</sup> CCC. Cambridgeshire Insight. Cambridgeshire and Peterborough Population and Dwelling Stock Estimate Mid-2011 to Mid 2020.

<sup>4</sup> NCC. Norfolk Insight Housing and Households Area Report. Kings Lynn West Norfolk. 2021.



residual waste (the without Proposed Development case), the Proposed Development would save an estimated 2,571ktCO<sub>2e</sub> over its lifetime. This carbon saving would contribute towards achieving the UK's carbon budget and is a clear project benefit.

- 2.4.7 The carbon savings calculation reported within the ES does not rely upon the substitution of natural gas, used to create heat for the food and industrial processes currently operating in Wisbech, with heat supplied from the Proposed Development. However, a key project benefit is that the Proposed Development includes a CHP Connection which provides the opportunity for local businesses to take heat and electricity. This benefit is considered in greater detail later in this report.
- 2.4.8 The benefit of a CHP connection is recognised in government policy. Most notably, NPS EN-1 recognises that supplying steam to customers after it has been used to drive electricity generating turbines results in less fuel being used to generate the same amount of heat and power, thereby reducing Green House Gas (GHG) emissions. Given the benefits of CHP, government requires all thermal generating stations either provide CHP or demonstrate conclusively why it is not possible. Whilst the Proposed development is not classified as a thermal generating station and is below this threshold, the Proposed Development has incorporated the CHP Connection and is confident that the market is there in the local area for it.

## Energy security

- 2.4.9 The recent British Energy Security Strategy is very clear on the importance of energy self-sufficiency. As energy prices increase due partly to pressures outside of the nation's control, the need for an increasingly self-sufficient energy system that is less influenced or controlled by external forces becomes apparent.
- 2.4.10 The Proposed Development's fuel would be nationally produced residual waste. The Applicant has undertaken research to determine the amount of waste currently going to landfill, and hence the market for the Proposed Development. This research is presented within the **Waste Fuel Availability Assessment (WFAA Volume 7.3)** and is considered in greater detail later in this report. However, in summary, the assessment demonstrates that there is sufficient residual waste available and that there is no requirement to import residual waste to operate the Proposed Development. The fuel security for the Proposed development is therefore assured.
- 2.4.11 The Proposed Development can supply heat and power to the national grid and local commercial customers, providing a secure baseload source which can be relied upon irrespective of movements in international energy markets.
- 2.4.12 The additional benefits of extracting useable energy from residual waste are set out in the next section of this report.

## 2.5 Conclusion

- 2.5.1 National energy policy seeks to deliver a diverse supply of energy which is secure and supportive of broader government plans to achieve net zero by 2050. Increasing the amount of energy generated by renewable sources is key to achieving these aims, although there is recognition that certain forms of renewable energy can be



intermittent. There is, therefore, a recognition of the importance of energy sources with high levels of availability, with the recent British Energy Security Strategy identifying nuclear as one solution.

- 2.5.2 CHP technology is a recognised means of improving the efficient use of energy and, in the context of biomass and EFW, can improve upon the carbon savings which these technologies already deliver over a 'do nothing' option of landfill that sits lower in the waste hierarchy.
- 2.5.3 The Proposed Development delivers clear project benefits associated with renewable energy generation. It supports government aims to improve national self-sufficiency and redirects waste from landfill. Including CHP further enhances the efficiency of the Proposed Development, which would operate at high levels of availability, thereby addressing some of the recognised limitations of other renewable energy technologies.
- 2.5.4 There is a recognised need set out in the national policy for energy development, such as the Proposed Development, but equally recognition that the generation of energy is secondary to the main purpose of an EfW facility, which is to process waste. The next section of this report therefore demonstrates the project benefits associated with the movement of waste further up the waste hierarchy in the context of this application.



## 3. Waste

### 3.1 Introduction

3.1.1 National energy policy summarised and commented upon in the previous section provides a clear direction that notwithstanding the energy benefits which arise from EfW, an EfW facility's primary purpose is to move waste up the waste hierarchy, and away from landfill. National (and local) policy recognises that this movement of waste up the waste hierarchy provides significant benefits.

3.1.2 This section, therefore, comments upon the amount of residual waste presently and forecasted to go to landfill and substantiates the Applicant's position that there is sufficient residual waste to supply the Proposed Development. This section begins with a summary of key legislation and policy relative to waste. A fuller summary is provided within the **WFAA (Volume 7.3)**.

### 3.2 Waste Framework Directive

3.2.1 The revised Waste Framework Directive (rWFD), December 2008 (Directive 2008/98/EC), established the overarching framework for the management of waste across the EU. It introduced a five point waste hierarchy:



### 3.3 National legislation and policy

3.3.1 The Waste Framework Directive was incorporated into national legislation via the Waste (England and Wales) Regulations 2011 (as amended) (the 'Waste Regulations 2011'). The requirements of the Waste Regulations 2011 and the waste hierarchy are consistently applied within the relevant national policy statements most notably NPS EN-3 and within national planning policy.



## National energy and planning policy

- 3.3.2 NPS EN-3, in its consideration of waste combustion generating stations states, at paragraph 2.5.64 that stations ‘*need not disadvantage reuse or recycling initiatives where the proposed development accords with the waste hierarchy.*’
- 3.3.3 The National Planning Policy Framework (NPPF) 2021 and associated planning practice guidance promotes the prudent use of natural resources and waste minimisation (NPPF paragraph 8c). The Planning Practice Guidance (PPG) reinforces the importance of driving waste up the waste management hierarchy and is itself consistent with the National Planning Policy for Waste 2014, England’s National Waste Strategy 2018 and the Waste Movement Plan for England 2021. All these documents refer to the implementation and importance of the waste hierarchy.

## Environmental policy relevant to waste and the waste hierarchy

- 3.3.4 The UK government’s 25-year environmental plan, A Green Future: Our 25 Year Plan to Improve the Environment, published in 2018 and last updated in October 2021, sets out the government’s commitments to improve the environment with a focus spread across a number of sectors. Regarding waste, the plan has an objective to minimise waste by working towards an ambition of zero avoidable waste by 2050. It also aims to meet all existing waste targets, including landfill, whilst developing new future targets and milestones.
- 3.3.5 The Environment Act 2021 allows the SoS to set targets across four priority sectors: air quality, water, biodiversity, resource efficiency and waste reduction.
- 3.3.6 Part 4 of the Act considers resource efficiency and waste reduction. Other measures seek to improve the segregation of waste collected, thereby improving opportunities to recycle and include powers to prevent the importation or exportation of waste into the UK.
- 3.3.7 Environmental policy and legislation are therefore consistent with energy and waste specific policy and legislation in seeking to reduce the amount of waste produced, increase recycling, and promote self-sufficiency in its treatment and disposal.

## Moving waste up the hierarchy

- 3.3.8 The **WFAA (Volume 7.3)** considers the local and national context for the disposal of residual waste and identifies the amount of waste which is currently being landfilled, and demonstrates that the Proposed Development is *in accordance with the waste hierarchy and of an appropriate type and scale so as not to prejudice the achievement of local or national waste management targets in England.* (NPS EN-3 paragraph 2.5.70).
- 3.3.9 The WFAA concludes that within the defined local Study Area that there was almost 2.5 million tonnes of waste managed at the bottom of the waste hierarchy and sent to non-hazardous landfill in 2019. Furthermore, it concludes that exports of waste from the UK stood at 1.7 million tonnes at the beginning of 2022, ~100,000 tonnes of which was likely exported directly from within the Study Area as identified by the **WFAA (Volume 7.3)**.



- 3.3.10 Future predictions around waste arisings factoring in government targets to reduce, reuse and recycle suggest that there will be a shortfall in the capacity of the industry to accommodate waste other than by landfill of approximately 1.9 million tonnes up to 2030, reducing to approximately 1.8 million tonnes by 2035. As the availability of non-hazardous landfill declines, the importance of facilities to receive and use the waste which will continue to be generated grows. and the **WFAA (Volume 7.3)** reports that in the East of England alone, there will be a residual waste management capacity gap of between 1.4 and 2.7 million tonnes per annum, with the requirement doubling for the wider London and South-east area. Nationally, and even if government targets to recycle 65% of municipal and 'municipal like' commercial and industrial waste are achieved by 2030, there would remain a minimum shortfall of approximately 2.8 million tonnes of residual HIC capacity in the UK (this would rise to over 6 million tonnes if the government's recycling target is undershot by 5%).
- 3.3.11 The **WFAA (Volume 7.3)** demonstrates insufficient landfill capacity to handle the amount of waste currently forecast to be generated. Landfilling is placed at the bottom of the waste hierarchy, and government policy is clear that waste producers should seek to move up the hierarchy wherever possible.
- 3.3.12 The **WFAA (Volume 7.3)** also demonstrates that there is currently insufficient capacity to handle the forecasted waste arisings but using EfW would ensure that benefit is taken from the treatment of residual waste; the benefits are explained within the preceding sections of this report. Rather than develop additional landfill, the Proposed Development provides a clear and justifiable project benefit in that it will provide additional capacity required to receive and process residual waste. In summary, the Proposed Development can support government policy in firstly moving waste up the hierarchy, secondly reducing greenhouse gas emissions over the landfill alternative and, thirdly, providing a secure and consistent supply of energy either to local customers or to the national grid.
- 3.3.13 The local opportunities for receiving the heat and power generated by the Proposed Development are considered in the next section of this report.

### Supporting the principle of proximity

- 3.3.14 The National Planning Policy for Waste 2014 requires waste planning authorities when identifying sites or areas for waste management facilities to identify locations in line with the proximity principle and to site facilities which include for low carbon energy recovery in locations that enable the utilisation of the heat produced as an energy source in close proximity to suitable potential heat customers.
- 3.3.15 Currently NCC has a contract to export its residual waste to Great Blakenham near Ipswich but with the majority now being transported to an energy from waste facility in Bedfordshire. This is a journey of 90+miles, dependent upon the locations from which the waste is transported within Norfolk, and a distance that is substantially further than one that would take waste to the Proposed Development. The WFAA also records the amount of waste which is presently exported overseas contrary to the principle of proximity and recent government objectives to improve self-sufficiency.
- 3.3.16 The Proposed Development therefore combines the project benefit of a location which enables the utilisation of heat in proximity to suitable potential heat customers



with one which is closer than current management facilities to certain sources of waste arisings.

### 3.4 Conclusion

3.4.1 Research undertaken by the Applicant demonstrates that there is a significant amount of residual waste being landfilled both within a defined Study Area and nationally. Government aims to increase recycling rates consistent with the waste hierarchy. Yet even if these rates were to be achieved, there would be insufficient facilities (landfill or EfW) available to deal with future residual waste arisings. There is therefore a need for the Proposed Development to treat waste, prevent it begin landfilled and to provide extra useful and reliable energy consistent with the national policy statements referenced in the preceding section of this report.

3.4.2 The Proposed Development would facilitate the management of significant quantities of residual waste, some of which is presently managed comparatively remote from where it is produced or is otherwise exported for management abroad. The Proposed Development would allow waste to be managed in accordance with the proximity principle which is a further fundamental pillar of England's waste management policy and legislative framework.



## 4. Combined Heat and Power and CCR

### 4.1 Introduction

4.1.1 Section 2 summarised national energy policy which recognises the benefits of increased plant efficiency and carbon emission reduction which can come through the adoption and deployment of CHP.

4.1.2 The Proposed Development does not fall within the thresholds identified by national energy policy whereby CHP is mandated, however the Applicant is confident there are opportunities available to it to deploy CHP and therefore the Proposed Development includes a CHP Connection as part of the application. This section of the report considers CHP and Carbon Capture Readiness (CCR) relative to the Proposed Development and identifies the project benefits which could accrue.

### 4.2 CHP

4.2.1 National policy (NPS EN-1 Section 4.6) describes the CHP process and the opportunities it provides to provide heat, power and cooling. It recognises that to be economically viable a generating station (with CHP) needs to be located close to industrial or domestic customers with heat demands and states that the use of CHP to displace conventional heat generation is encouraged where it is more efficient than the alternative supply. It calls for substantial additional positive weight to be given by the decision maker to applications incorporating CHP.

4.2.2 NPS EN-1 suggests that consideration may be given to the imposition of a requirement to ensure that a generation station is CHP ready.

4.2.3 The draft NPS EN-1 replicates the policy guidance contained within the adopted statement and consistent with that document reiterates the requirement for applicants of thermal generating stations to give proper consideration to CHP and if it is not to be provided to demonstrate why this is not the case. As with the adopted statement the draft NPS at paragraph 4.7.7 states that applicants (in the case of new thermal generating stations) should consider the opportunities for CHP from the very earliest point and that it should be adopted as a criterion when considering locations for a project.

4.2.4 Generating 55MW net, the Proposed Development is not obligated by national energy policy to provide for CHP although it is accepted that it is a requirement under the Environmental Permitting (England and Wales) Regulations 2016 for new combustion power plants and/or new EfW plants with a throughput of waste at levels which would be substantially below those planned for the Proposed Development to be CHP ready.

4.2.5 The Applicant has a strong commitment to CHP recognising the environmental and economic benefits that it can provide. MVV's current UK facilities at Devonport (Plymouth), Baldovie (Dundee) and Ridham (Kent) all operate CHP systems, in the case of Devonport, the EfW CHP Facility heats the adjacent Royal Navy Dockyard.



4.2.6 The CHP Connection is a key project component for which consent is sought and the Proposed Development has been designed from the outset to facilitate the transportation of heat and power into the surrounding industrial estate in Wisbech. Consistent with national policy the Applicant adopted CHP opportunities as a key criterion in the process of site selection and identified Wisbech, and the application site, as a location where such opportunities could be maximised. A key locational advantage of the Proposed Development site is the proximity of potential heat and power customers.

4.2.7 To demonstrate and justify the appropriateness of the Proposed Development's location and opportunities for the supply of heat and power a **CHP Assessment Report (Volume 7.6)** has been prepared to accompany the application. This document analyses potential demand for heat and power and demonstrates the financial viability of the Applicant's proposals. The assessment concludes the following:

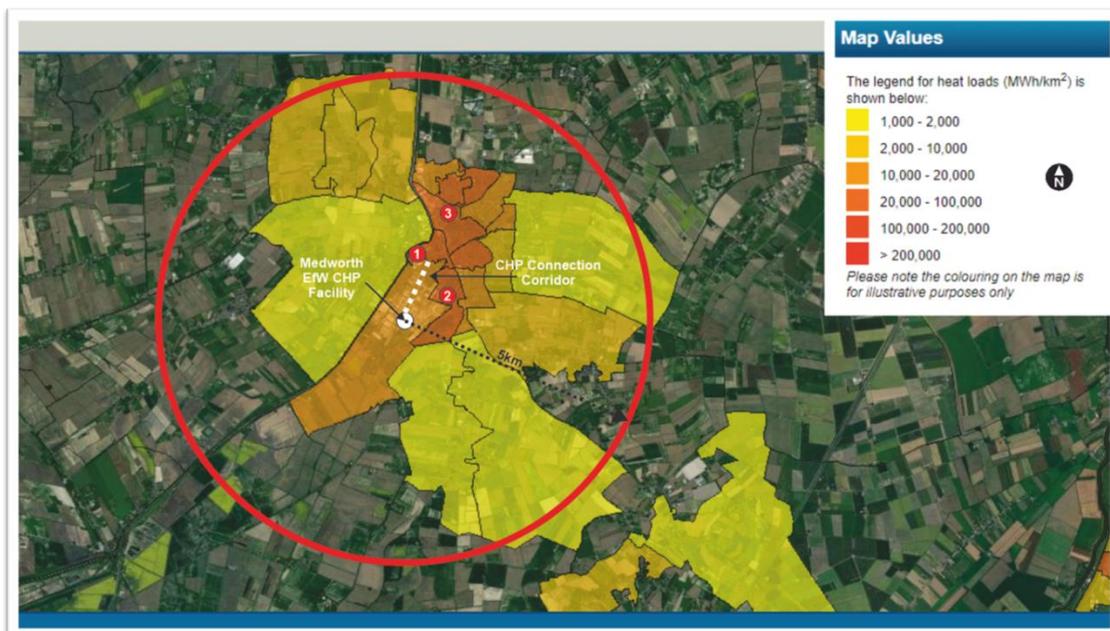
- Referencing the BEIS report 'Opportunity areas for district heating networks in the UK: National Comprehensive Assessment (the NCA) of the potential for efficient heating and cooling'<sup>5</sup>, September 2021, it notes that the East of England has higher-than average domestic heating demand with lower-than-average heating requirements from industry.
- It finds that cooling demand for the industrial and commercial sectors in the east of England is conversely above the national average.
- It recognises that National Heat Map<sup>6</sup> (**Graphic 4.1**) developed with the aim of enabling prospective developers to identify potential locations where heat network implementation is likely to be economically viable, shows that Wisbech is a location with a potentially significant demand for heat.
- And, that due to their evident current heat demands and/or their proximity to the CHP Connection Corridor, there are as a minimum three potential heat users - Lamb Weston, Nestlé Purina and Eviosys Packaging - which could benefit from the heat and power produced whilst within the local area other industrial facilities include Del Monte and Fountain Frozen.

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5 BEIS. Opportunity areas for district heating networks in the UK, Sep 2021

6 BEIS. UK development Heat Map, accessed March 2022

Graphic 4.1 UK CHP Development Heat Map. BEIS.



- 4.2.8 The EfW CHP Facility has been designed to export electrical power to the National Grid with an export capacity of approximately 55.0 MWe. The power exported will vary depending on the ambient temperature, the amount of heat exported and the quality of the waste. The EfW CHP Facility will also be constructed as 'CHP Ready' and will have the capacity to export up to 50 MWth of heat to the nearby industrial heat users. The actual heat capacity will be confirmed during the detailed design stage and will be set as a minimum to meet the requirements of the heat consumers identified. The Proposed Development includes provision of a CHP Connection, from the EfW CHP Facility, along the corridor of the disused March to Wisbech Railway and includes for connection points to Lamb Weston and Nestlé Purina.
- 4.2.9 The use of heat and power from a CHP facility is recognised in the national policy referenced above as beneficial in that it displaces fossil fuel derived energy otherwise required to facilitate the relevant industrial processes. This displacement has been quantified by the Applicant and is reported within **Appendix 14C (Volume 6.4)** to ES **Chapter 14: Climate** and demonstrates in **Table 14C.2 Comparative sensitivity analysis of net annual emissions savings** that the inclusion of CHP increases the emissions saved over a 'do nothing' landfill alternative from 73,952 tCO<sub>2</sub> to 103,246 tCO<sub>2</sub> per annum based upon the current grid average. This represents a substantial project benefit.
- 4.2.10 The potential to supply heat to local customers can also provide benefits to their business operations. The EfW CHP Facility will be able to deliver sustainable energy at prices cheaper than those available from the electricity and gas networks. Such opportunities are clearly subject to confidential commercial discussions with the relevant customers. The supply of heat to a number of potential industrial food processing companies would enable them to further improve their own sustainability metrics, as well as lower their energy costs.



## 4.3 Carbon Capture Readiness

NPS EN-1 Section 4.7 provides policy guidance on carbon capture and storage and carbon capture readiness requiring that all applications for new combustion plant over 300MW demonstrate that they are carbon capture ready. The draft NPS EN-1 is consistent with the adopted statement. Whilst not applicable to the Proposed Development, the Applicant is aware that BEIS issued a call for evidence on an expansion to the 2009 CCR requirements to generation facilities under 300MW in July 2021 and also sought evidence as to whether the scope should be extended to include technologies such as EfW and CHP. The consultation closed in September 2021 although the outcome of this consultation has not yet been published by BEIS.

4.3.1 As the outcome of the consultation is unknown, the Applicant has ensured that the design of the EfW CHP Facility is carbon capture ready, via the following means:

- Consistent with NPS EN-1, sufficient space is available within the site to accommodate carbon capture equipment in the future. This would include the plant and equipment to capture carbon dioxide (CO<sub>2</sub>) from the flue gas emissions of the EfW CHP Facility and its transportation to a storage facility.
- the steam turbine will be designed so as to be ready for the installation of controlled low pressure steam extraction.
- space will be available for condensate return to the main condensate system, the diversion of flue gas through the CCS facility.
- an additional 11/15kV circuit breaker will be installed, plus a pre-installed duct from the switch room CCS facility.

## 4.4 Conclusion

4.4.1 National policy recognises the benefits of CHP to the extent that development of a certain type and size are required either to include or demonstrate conclusively why they cannot, deliver CHP. The Applicant and its parent group has significant experience in the successful implementation and operation of CHP networks. CHP is a key project component of the Proposed Development and opportunities to make efficient use of the heat and power generated by the EfW process were important when the location of the Proposed Development was selected. National mapping of CHP opportunities together with an assessment undertaken by the Applicant demonstrate the suitability of the location for CHP. Successful implementation of the CHP Connection will bring clear and justifiable project benefits.

4.4.2 Carbon capture for many industrial processes will be required if government legislative commitments for the UK to be net zero by 2050 are to be reached. National energy policy encourages carbon capture and requires certain technologies over a certain threshold to either deliver, or be ready to deliver, carbon capture whilst consultation has been held on reducing the existing applicable CCR thresholds and expanding the technologies covered. The Applicant recognises the importance of carbon capture and has committed to be carbon capture ready. This commitment is demonstrated by the setting aside of land within the EfW CHP Facility Site for carbon capture plant consistent with national policy and through the design



of plant and equipment. Future implementation of carbon capture would bring clear and justifiable project benefits.



## 5. Environment and other Project Benefits

### 5.1 Introduction

- 5.1.1 The preceding sections have identified the project benefits arising from generation of a secure and consistent supply of renewable energy from the Proposed Development, which is consistent with national and international policy to reduce waste to landfill and reduce the nations carbon emissions. That useful energy in the form of heat and power has the potential to be used locally bringing additional, local, economic benefit.
- 5.1.2 The Proposed Development contains measures which have been embedded into its design which will deliver further project benefits. These include environmental, social and economic benefits and are in some cases related to the overarching benefits of the project discussed above. Whilst there are clear environmental benefits associated with the reduction in requirements to landfill (such as reduced land take, a reduction in carbon emissions) this section concentrates upon the local environmental and other project benefits which would accrue as a result of the Proposed Development.

### 5.2 Environment

- 5.2.1 When designing the Proposed Development, the Applicant has sought to minimise environmental effects and has prepared an environmental impact assessment which is reported within an **Environmental Statement (Volume 6.2)**. The ES identifies those effects with the potential to occur and the measures which the Applicant has taken to mitigate them.
- 5.2.2 There are environmental benefits which will derive from the Proposed Development. The site selected for the EfW CHP Facility is predominantly occupied by an existing waste transfer station and aggregate store and of relatively low biological importance as evidenced by the ecological surveys reported within the ES **Chapter 11: Biodiversity (Volume 6.2)**. The Applicant objectives when designing the landscaping for the EfW CHP Facility Site has been to maximise biodiversity by creating habitats which are recognised as being of value locally. These include grassland, brown roofs and a green wall. The landscaping scheme also seeks to integrate sustainable urban drainage systems for the control of surface water and incorporates them within natural features such as a wet woodland and pond. Regular maintenance of these habitats consistent with the Applicant's **Outline Landscape and Ecology Management Plan (Volume 7.7)** should deliver ecological project benefits enhanced by the Applicant's commitment to the following:
- Bat and bird boxes provided within suitable areas of new and retained habitats and at appropriate locations on buildings;
  - The provision of habitat features for sheltering invertebrates such as 'bug hotels', decaying log piles, open patches of ground and shallow banks of sand/gravel/rubble;



- Hedgehog hibernation boxes with suitable areas of dense vegetation cover;
- The creation of refugia and hibernacula for reptiles and amphibians;
- New planting and sowing maximising the use of native species, of local provenance wherever possible. and
- Species mixes used throughout the habitat types tailored to provide sources of nectar, fruit and seeds; to maximise foraging provision for a broad assemblage of species.

5.2.3 These additional commitments are informed by and consistent with information and guidance provided by The Natural England National Habitat Network<sup>7</sup>, the Cambridgeshire and Peterborough habitat Opportunity Mapping and the Natural Cambridgeshire Developing with Nature Toolkit.

## BNG

5.2.4 Biodiversity net gain (BNG) provides for an accepted methodology to quantify the value of habitat and as a result provide an equivalent measure of gain. Whilst not yet a formal requirement for nationally significant energy projects, The Environment Act (passed in November 2021), which translates aspects of the government publication “A Green Future: Our 25 Year Plan to Improve the Environment” into legislation, will make it mandatory for the vast majority of development projects to deliver a 10% Biodiversity Net Gain (BNG) as a condition to gaining consent. The Act includes a requirement to NSIPs to deliver BNG although the required percentage increase (and the mechanisms and processes for achieving it) will be controlled by the SoS either through individual National Policy Statements or separately published statements.

5.2.5 The draft NPS EN-1 does make clear that Applicants will be expected to deliver BNG and should seek opportunities to contribute to and enhance the natural environment by providing net gains for biodiversity where possible. Consistent with this guidance the Applicant has committed to net gain and has identified options for achieving this favouring local opportunities to deliver the ecological benefits which would accrue.

## 5.3 Socio economic benefits

5.3.1 The Proposed Development represents a considerable financial investment into the local economy of some £350million during the construction phase alone. Construction will take place over 3 years and employ some 700 workers with up to 500 employed on site at peak. Whilst it is difficult to predict accurately where the construction workforce will come from it is recognised in the socio economic assessment reported within ES **Chapter 15 Socio economics, Tourism,**

<sup>7</sup> The Government’s 25 Year Environment Plan includes provision for a Nature Recovery Network (NRN) which set out the essence of what needs to be done to enhance the resilience and coherence of England’s ecological networks. Natural England have produced a series of National Habitat Network (NHN) maps to provide a baseline for the development of an NRN. The NHN maps identify areas of existing HPI and associated habitats with surrounding strategic zones where network enhancement and expansion could be achieved through targeted creation of complementary habitat.



**Recreation and Land use (Volume 6.2)** that even a small proportion of people sourced locally could lead to a significant positive effect, a clear project benefit.

- 5.3.2 The construction workforce would generate indirect employment. The socio-economic assessment uses a commonly applied multiplier to indicate that an additional 777 people could be supported in employment indirectly during the construction process. Sourcing services and products from local businesses would deliver additional positive economic benefit.
- 5.3.3 The Applicant has worked with Norfolk County Council to prepare an **Outline Employment and Skills Strategy (Volume 7.8)** consistent with existing skills strategies within Norfolk and Cambridgeshire and Peterborough aimed at supporting the training and upskilling of the local workforce, initially in construction-related employment. Requiring its EPC contractor to take on local apprentices and work experience and supporting existing training programmes positive project benefits would accrue.
- 5.3.4 The Proposed Development will operate for a period of 40 years. During this period, the Applicant is committed to continue with the implementation of the **Outline Employment and Skills Strategy (Volume 7.8)** such that it proposes to employ and train its own apprentices, support skills development and provide opportunities for internships and work placement and experience. This approach is wholly consistent with that which MVV operates at its existing UK facilities. The Strategy commits the Applicant to engage at the earliest opportunity with local educational establishments, job centres and community organisations to discuss how the Applicant might support local people to apply for, and secure, positions at the Proposed Development once operational.
- 5.3.5 Commitment to education and to wider community involvement is further demonstrated in the provision of a community area within the administration building this would be a multi-use area available for training and for visiting community groups and educational visits.
- 5.3.6 Once in operation the Proposed Development will employ directly 40FTE with a further 24 indirect jobs anticipated at the local level, and 32 when expanded across the county and region. The direct jobs will range in the level of skills and experience required thereby providing different entry points into the Applicant's workforce.
- 5.3.7 The **Outline Employment and Skills Strategy (Volume 7.8)** commits the Applicant to engage at the earliest opportunity with local educational establishments, job centres and community organisations to discuss how the Applicant might support local people to apply for, and secure, positions at the Proposed Development once operational. The Applicant also commits to employing a Community Liaison Manager.
- 5.3.8 Outside of the embedded measures that form part of the Proposed Development, and which are assessed within the environmental impact assessment, the Applicant has prepared a **Community Benefits Strategy (Volume 7.14)**. This statement commits the Applicant to establish a local liaison committee with the aim of delivering a range of local community benefits.



## 5.4 Conclusion

- 5.4.1 Government policy and legislation is seeking to embed within development proposals environmental mitigation and enhancement. A sustainable approach to development is further supported by government policies to spread economic growth nationally.
- 5.4.2 The Applicant is committed to improving biodiversity as a result of the Proposed Development. It has designed a landscaping scheme which maximises habitat creation and includes a commitment to deliver net gain in biodiversity.
- 5.4.3 The Applicant and MVV has a strong track record which demonstrates its commitment to supporting local employment, training, skills and education both during construction and operation. An **Outline Employment and Skills Strategy (Volume 7.8)** has been produced for the Proposed Development which will commit the Applicant to support local suppliers, encourage and support local education and skills training and work with local suppliers to enable them to access the business opportunities that will be available.



## 6. Conclusion

- 6.1.1 National energy policy, most notably the national policy statements recognise the importance of energy to the UK and are clear that there is an urgent need for energy developments particularly those which support government legislation to reduce carbon emissions and where possible provide a regular and consistent energy supply. Recently the importance of energy security has risen up the political and policy agenda.
- 6.1.2 National policies recognise the benefits which EfW facilities can bring to the UK's energy market however policy is also clear that the primary purpose of an EfW which is to receive and process waste. To be able to rely upon the benefits of and urgent need for energy generation an EfW project therefore has to be able to demonstrate that there is a demand for EfW and that this form of treatment is consistent with the waste hierarchy.
- 6.1.3 The Applicant has demonstrated that there is a requirement for additional EfW capacity and that without it, significant amounts of waste will continue to be landfilled. There is therefore a clear project benefit relating to the movement of waste up the waste hierarchy.
- 6.1.4 The treatment of waste within an EfW facility does reduce the level of carbon emissions over a landfill alternative. This is recognised in national policy and demonstrated by the Applicant. Further saving can be made if the energy and heat generated by the process can be used within a CHP system and developers of combustion plants are encouraged (and dependent upon their size, required) to consider CHP opportunities. This consideration should begin at the point at which they look for suitable sites.
- 6.1.5 The Applicant and MVV has a strong track record in the implementation and operation of CHP and such opportunities were at the forefront when selecting the location for the Proposed Development. Subsequent information provided by government and commissioned by the Applicant confirms that Wisbech is a good CHP location. The Proposed Development therefore includes a CHP Connection in addition to a Grid Connection and it is the Applicant's firm intention to construct and operate it subject to agreeing commercial contracts with customers. This would be a clear project benefit.
- 6.1.6 Government environmental legislation once enacted will require applicants to improve the biodiversity of the sites they are developing. This requirement will extend to nationally significant infrastructure projects. The Applicant has developed a landscape design which maximises habitat creation and which would be appropriate to the local area. It also commits to a delivering a net gain in biodiversity and will seek to deliver this locally. This is a clear project benefit.
- 6.1.7 The construction and operation of the Proposed Development will require a substantial financial investment and generate a range of jobs during both the construction and operation phases. These jobs will be direct and indirect and the Applicant is commitment to maximising opportunities for the local workforce. This will be achieved through the further development and successful implementation of



an **Outline Employment and Skills Strategy** which will also prioritise education, training and skills development. The Applicant will ensure the successful implementation of this strategy via a full time Community Liaison Manager. Local employment opportunities, support and engagement with the local supply chain are clear project benefits.

