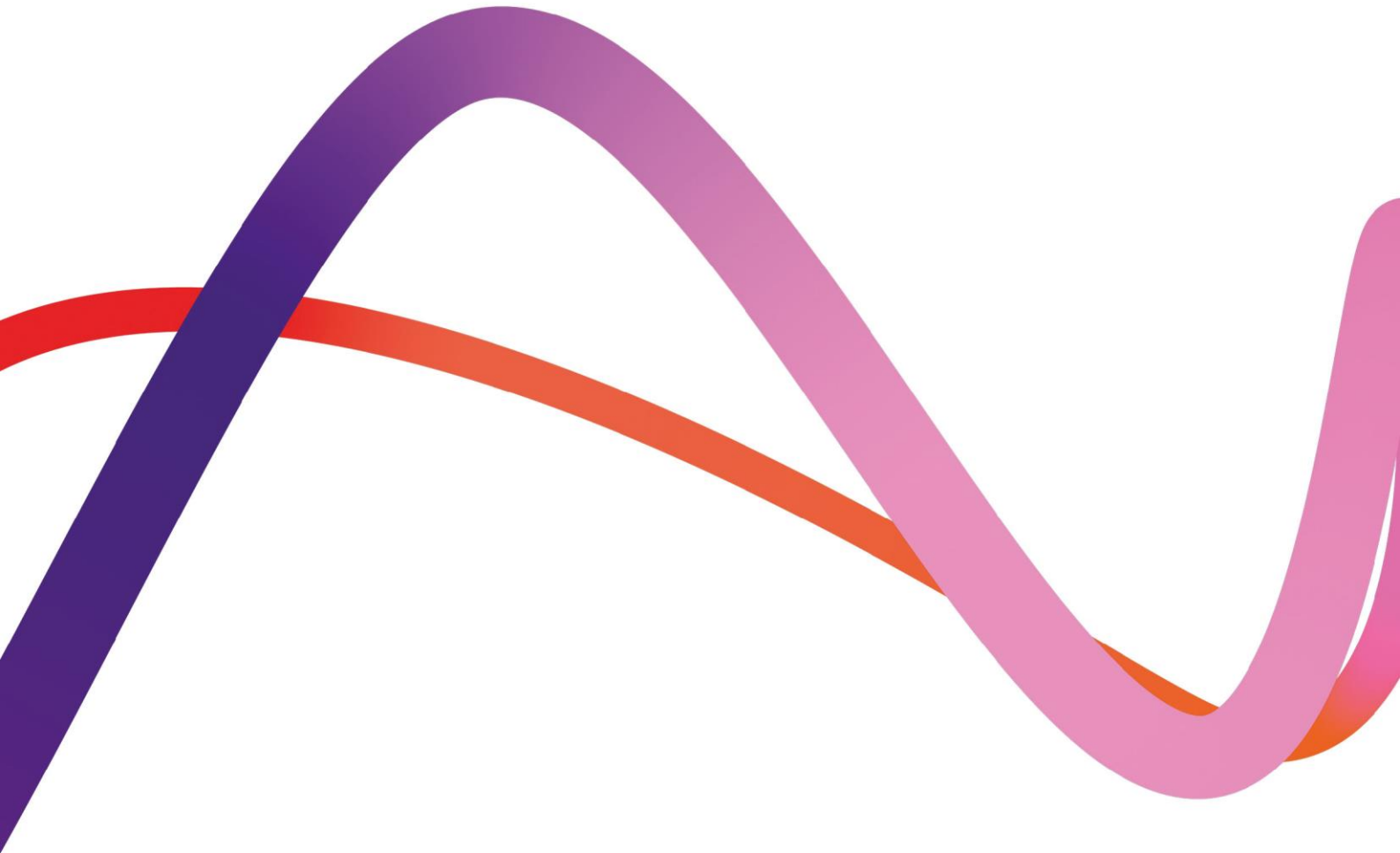


Medworth Energy from Waste Combined Heat and Power Facility



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Revision: 1
Deadline: 1
March 2023



Applicant's response to the Relevant Representations – Part 9 Appendices

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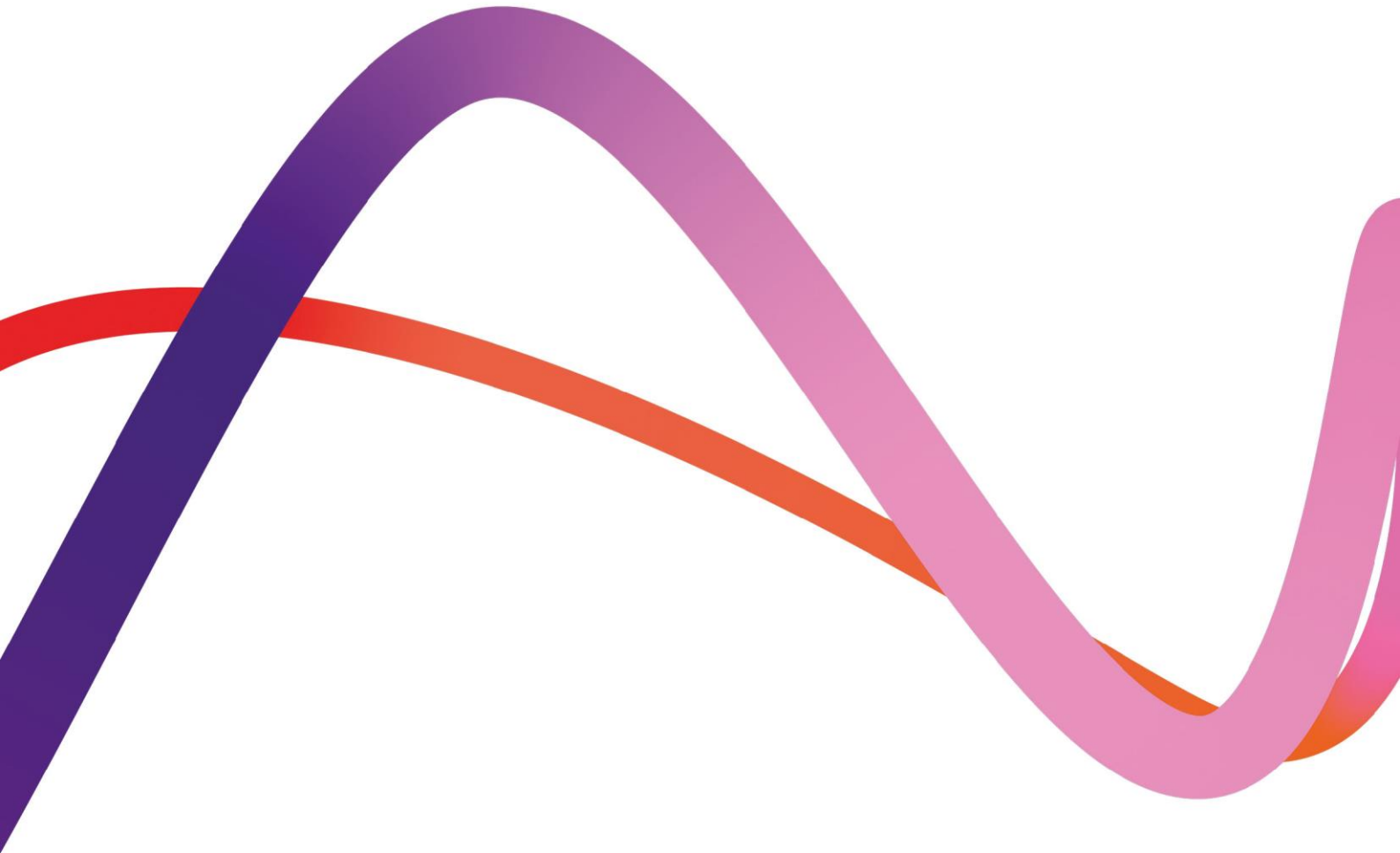
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Medworth Energy from Waste Combined Heat and Power Facility

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February 2023



Technical Meeting Note

Traffic and Transport – Algores Way

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1. Introduction

- 1.1.1 Cambridgeshire County Council (CCC), jointly with Fenland District Council, submitted relevant representation (RR-002) to the Planning Inspectorate (PINS) as part of the examination phase of the Medworth Energy from Waste (EfW) Combined Heat and Power (CHP) Facility Development Consent Order (DCO) Application. The DCO Application was submitted by Medworth CHP Ltd (the Applicant).
- 1.1.2 A meeting was held on 24 November 2022 between the Applicant and its environmental consultants (WSP) and representatives from CCC in order to discuss the comments provided and clarify questions concerning **Chapter 6: Traffic and Transport** of the Environmental Statement (ES) (**Volume 6.2**) [APP-033].
- 1.1.3 This Technical Note provides a response to CCC'S request for clarification with regard to the number of HGVs proposed to use Algores Way during the construction phase.



2. Algores Way

2.1 Existing operational use

- 2.1.1 The EfW CHP Facility Site is located to the south of Wisbech on an existing industrial estate, bounded by the disused March to Wisbech Railway to the west, New Bridge Lane to the south and Algores Way to the north-east. Currently, the majority of the proposed EfW CHP Facility Site is an operational aggregates and waste transfer station (WTS) and is accessed via an existing surfaced access from Algores Way. To reach the WTS site entrance, traffic is required to route along Algores Way from Weasenham Lane. From Weasenham Lane site traffic can access the A47 by either routing east to the A1101 Elm High Road, joining the A47 at the A1101/A47 junction, or by routing west to the B198 Cromwell Road, joining the A47 at the B198/A47 junction.
- 2.1.2 Algores Way is a single carriageway road which runs into an industrial area from Weasenham Lane. Numerous industrial properties face onto Algores Way and pedestrian footways are provided on both sides of the carriageway. Minor road junctions with Algores Way provide access to premises located in the wider industrial area beyond Algores Way.
- 2.1.3 The site is currently occupied by Mick George Ltd which operates the Wisbech WTS off Algores Way. The current permit (EPR/BB3137AY) specifies the total quantity of waste that can be accepted at the site as being 75,000 tonnes per annum (tpa).
- 2.1.4 An information request was sent to the site operator by the Applicant to understand the existing traffic generation levels at the WTS site. Information provided to WSP highlighted that the site generates traffic from two principal operations: WTS operations; and the sale of aggregates.
- 2.1.5 Site records indicate that for the calendar year of 2020 the WTS operation generated a throughput of circa 48,000tpa. Based on the assumption that vehicle movements to deliver waste to the site and to transport processed waste away from the site will use a 26-tonne walking floor heavy goods vehicle (HGV), the resultant traffic generation for the WTS operation in 2020 is circa 28 two-way HGV movements per day, (14 HGVs in and 14 HGVs out) rising to circa 44 two-way HGV movement as allowed by the current operational permit. HGV movements would likely be higher on some days and lower on other given the normal fluctuations in waste transfer traffic movements.
- 2.1.6 No records on the sales of aggregates have been provided, however the site operator has provided an assumption that 10,000tpa of aggregate is sold at the Wisbech site. Aggregate would be delivered to the site via an 8 wheeled tipper (circa 19 tonnes) and resold as small loads transported by light goods vehicles (LGV) (circa 7.5 tonnes). Based on these assumptions the sale of aggregates would generate approximately 4 two-way HGVs per day, 2 HGVs in and 2 HGVs out and 10 two-way LGVs per day, 5 LGVs in and 5 LGVs out. Vehicle movements would likely be higher on some days and lower on other given the normal fluctuations in aggregate imports and exports. Furthermore, there are no planning consent restrictions on the number of vehicles that can access the WTS via Algores Way.



- 2.1.7 A summary of traffic movements based on the maximum allowed under the permit for the existing operational use is provided in **Table 2.1**. As identified above, this is an estimated average over the year, and vehicle movements would be higher on some days and lower on others dependent on-site operations.

Table 2.1 Existing Operational Use – Daily Traffic Movements

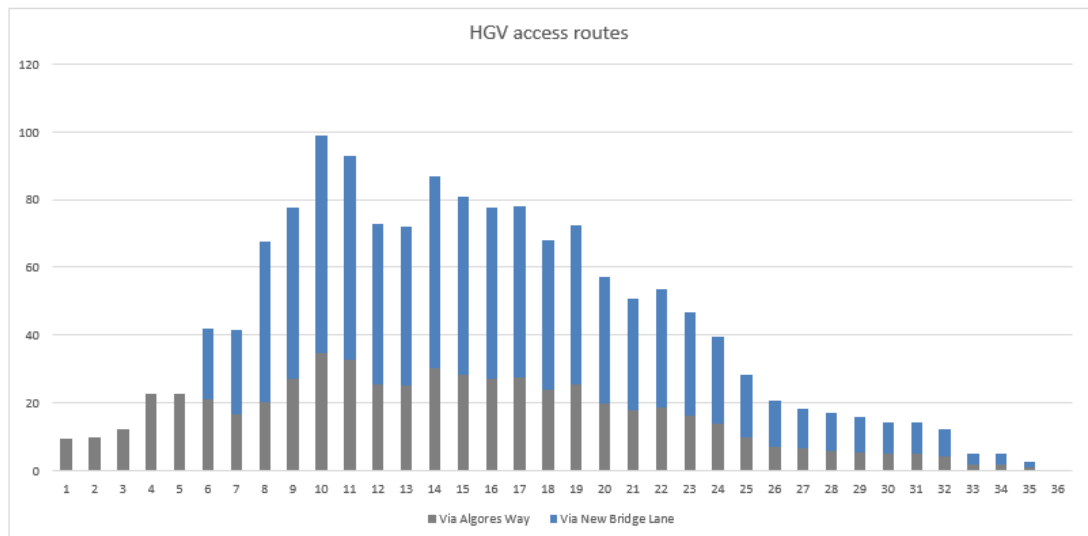
Operation	Annual Tonnes (permitted)	One-way	Two-way
Waste Transfer Station	75,000	22	44
Aggregate Sales – HGV	10,000	2	4
Aggregate Sales – LGV		5	10
Total Vehicles	-	29	58

2.2 Proposed use - Construction

- 2.2.1 The Applicant proposes to use both Algores Way and New Bridge Lane when constructing the Proposed Development. As set out in **Chapter 6: Traffic and Transport** of the ES (**Volume 6.2**) [APP-033], it is anticipated that 65% of construction HGVs would use New Bridge Lane and 35% would use the current site access off Algores Way. New Bridge Lane will be the main focus for access once works to open the highway across the disused March to Wisbech Railway have been completed and a new access constructed into the EfW CHP Facility Site. The Transport Assessment submitted with the DCO Application (**ES Chapter 6 Traffic and Transport Appendix 6B Transport Assessment Volume 6.4**) [APP-073] identifies that in month 14, which is the peak month for all construction traffic (HGV and LV), that 30 HGVs would route into Algores Way per day (60 two-way vehicle movements). During the peak hours this would equate to 5 two-way HGV movements on Algores Way during the 12-hour day for construction activity.
- 2.2.2 Month 14 represents the peak month for total construction traffic, however, the peak for Algores Way would be month 10 which would result in 35 HGVs per day, (70 two-way vehicle movements). Accounting for the removal of existing HGV traffic associated with the existing operational WTS, the net increase in HGV/LGV traffic in months 10 and 14 would therefore be 12 and 2 two-way movements respectively. With the construction site operating 12 hours weekdays this could then equate to an additional 1 two-way movement.
- 2.2.3 **Figure 2.1** provides a summary of HGV movements on Algores Way and New Bridge Lane during the construction programme.



Figure 2.1 – HGV Movements Over Construction Programme



Access route for HGV/day (EfW CHP Facility)	Month																																			
(ONE WAY) Ave HGV vehicles (day)	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36
Total HGV	10	10	12	23	23	42	41	68	78	99	93	73	72	87	81	78	78	68	73	57	51	54	47	40	28	20	18	17	16	14	14	12	5	5	3	0
Via Algores Way	10	10	12	23	23	21	17	20	27	35	33	25	25	30	28	27	27	24	25	20	18	19	16	14	10	7	6	5	5	5	4	2	2	1	0	
Via New Bridge Lane	0	0	0	0	0	21	25	47	51	64	60	47	47	56	52	50	51	44	47	37	33	35	30	26	18	13	12	11	10	9	8	3	3	2	0	

2.2.4 It should be noted that during the 36 month construction period, months 10-11 and 14 would exceed the existing WTS operational traffic assumption of 58 HGV/LGV two-way movements. In the remaining construction months, movements would be lower than the current permitted levels, resulting in a net reduction in traffic movements. However, since there are no vehicle restrictions to control the number of vehicle movements to and from the existing WTS, the actual amount could exceed the Proposed Development’s construction assumptions.

2.2.5 It should be noted that construction traffic movements associated with the Proposed Development will be managed according to the **Outline Construction Transport Management Plan (Volume 6.4) [APP-072]**. This together with the **Outline Construction Environmental Management Plan (Volume 7.12) [APP-103]** sets out the means by which the environment effects of construction traffic and wider construction activities will be managed. The Outline CTMP includes for the monitoring, review and enforcement of activities related to the arrival and departure of construction traffic and includes for briefing on the obligations of the CTMP, Delivery Management System briefing, driver inductions and compliance guidance

2.3 Proposed use – Operation

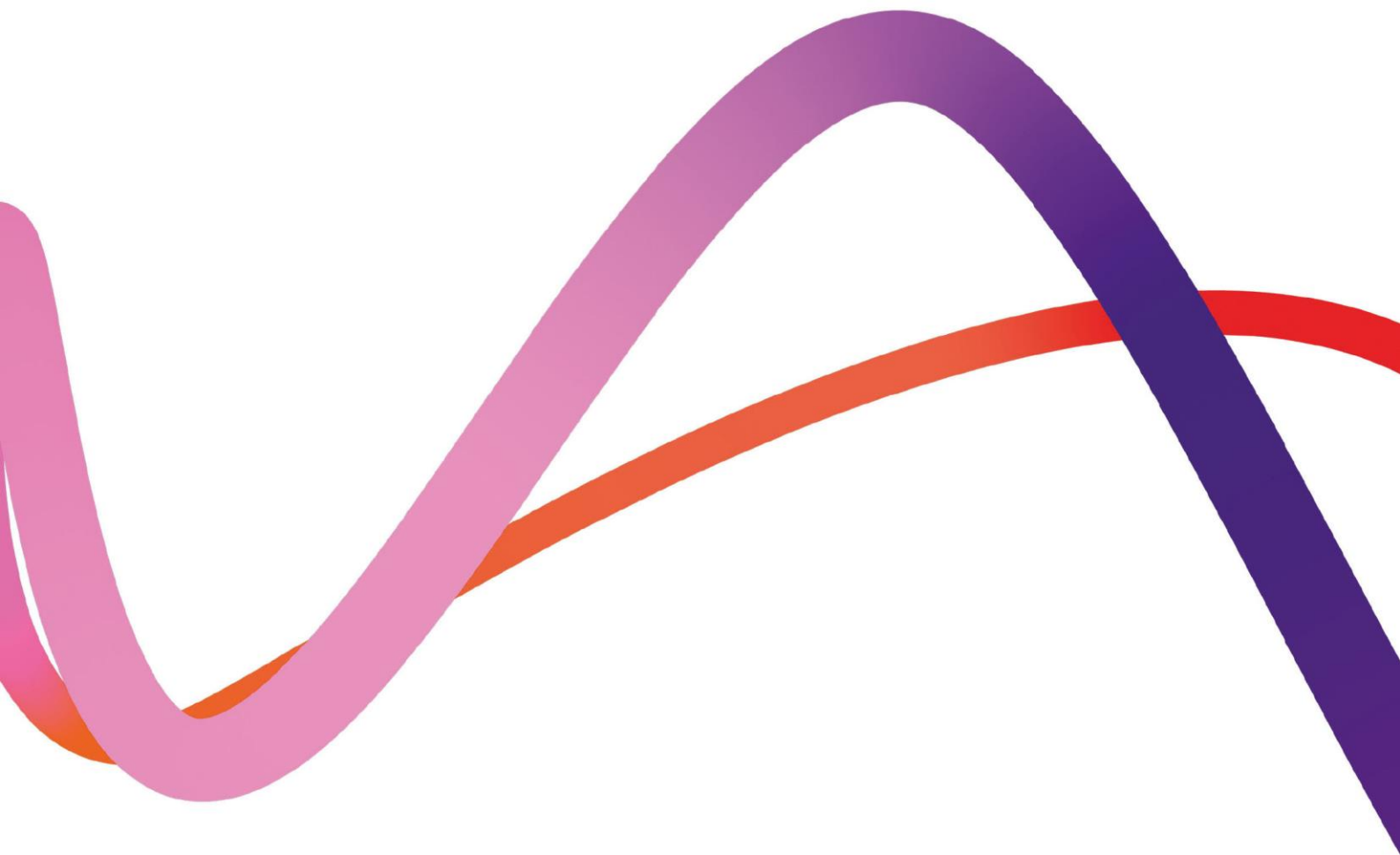
2.3.1 Once operational, HGV traffic will be expected to arrive at the Proposed Development via New Bridge Lane. This will be enforced through its inclusion in the **Outline Operational Traffic Management Plan (Volume 7.15) [APP-106]** and **Outline Operational Travel Plan (Volume 6.4) [APP-074]**.

2.3.2 HGV traffic will not use Algores Way. This will therefore see a reduction to zero in the current number of HGVs over the baseline situation which would otherwise include for the continued operation of the operational aggregates and WTS.



3. Conclusion

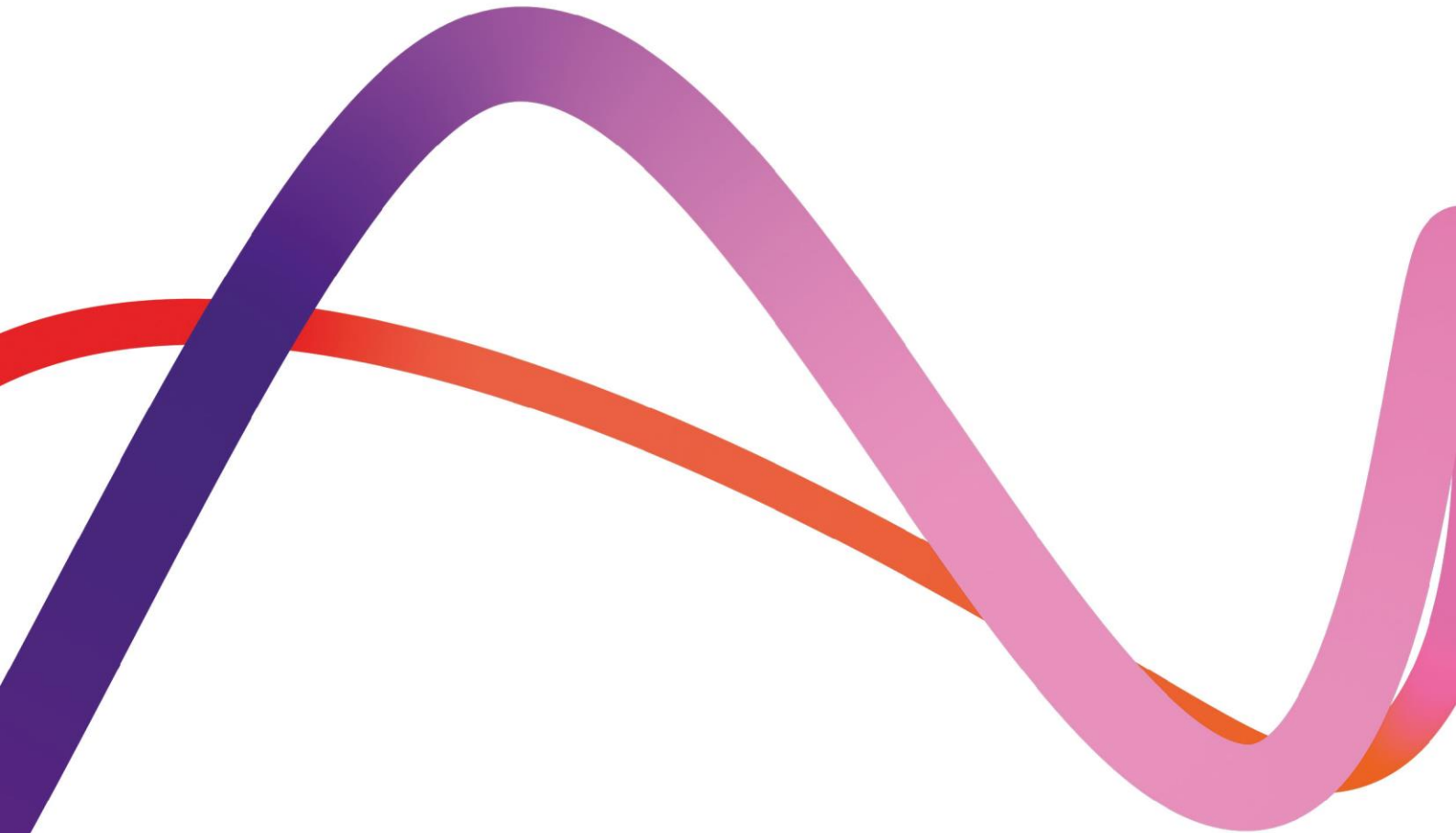
- 3.1.1 The existing WTS generates an average of 24 HGVs (44 two-way) and 5 LGVs (10 two-way) daily movements via Algores Way. Based on the traffic data provided in **ES Chapter 6 Traffic and Transport Appendix 6B Transport Assessment Volume 6.4 [APP-073]**, the net change in traffic would be greatest along Algores Way in month 10 whilst month 14 is the peak construction transport month overall. This would equate to an increase of 12 and 2 two-way HGV and LGV movements respectively. In 33 of the 36 construction months, HGV/LGV movements would be lower than the current permitted levels. However, since there are no vehicle restrictions to control the number of vehicle movements to and from the existing WTS, the actual amount could exceed the Proposed Development's construction assumptions.
- 3.1.2 Operational HGV traffic will not use Algores Way. This will therefore see a significant reduction in the current number of HGVs over the baseline situation which would otherwise include for the continued operation of the operational WTS.



Medworth Energy from Waste Combined Heat and Power Facility



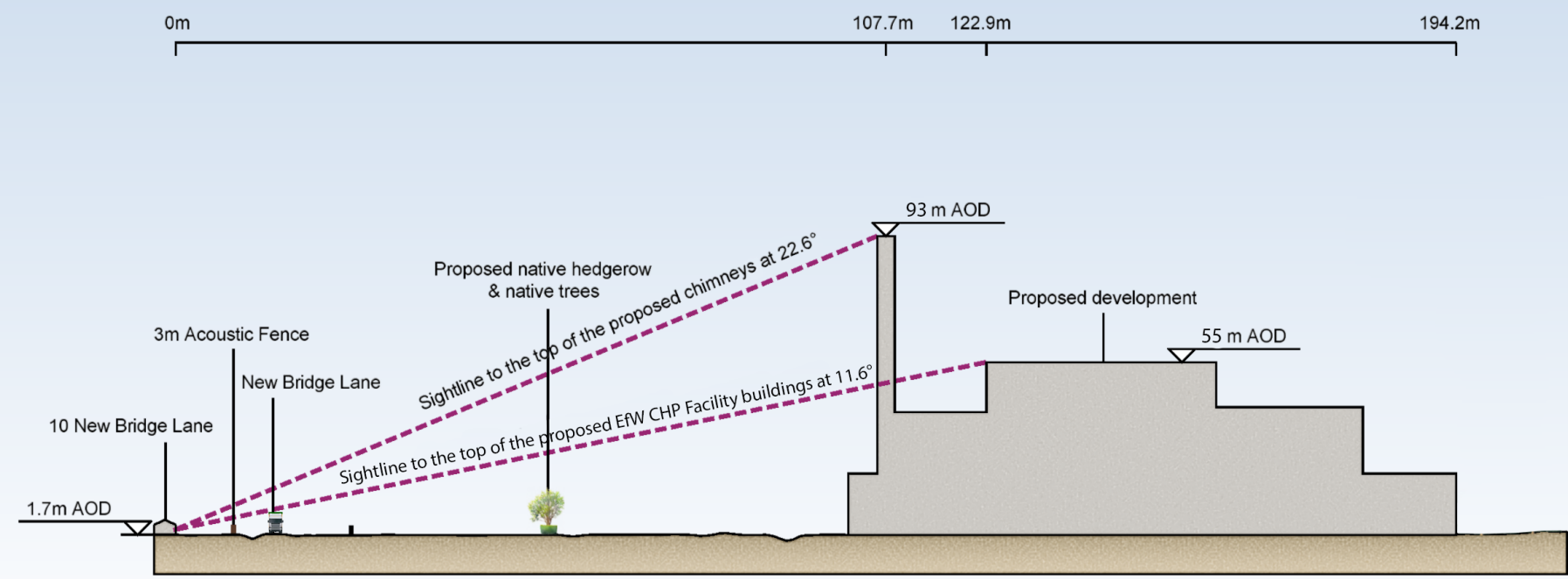
PINS ref. EN010110
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March 2023



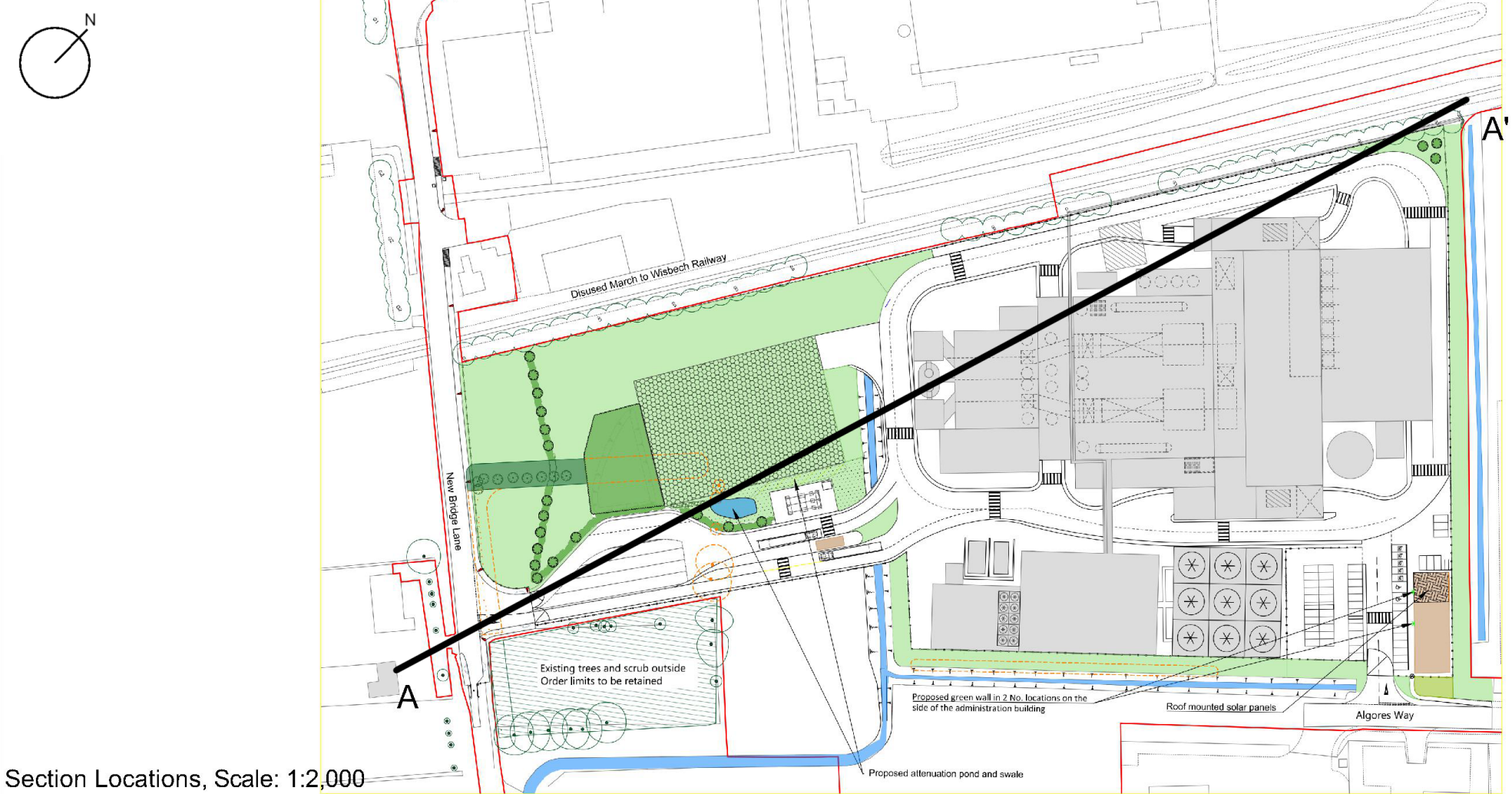
Appendix 9.2B Cross sections and ZTVs

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Key



Section A-A', Scale: 1:2,000



Section Locations, Scale: 1:2,000

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Client

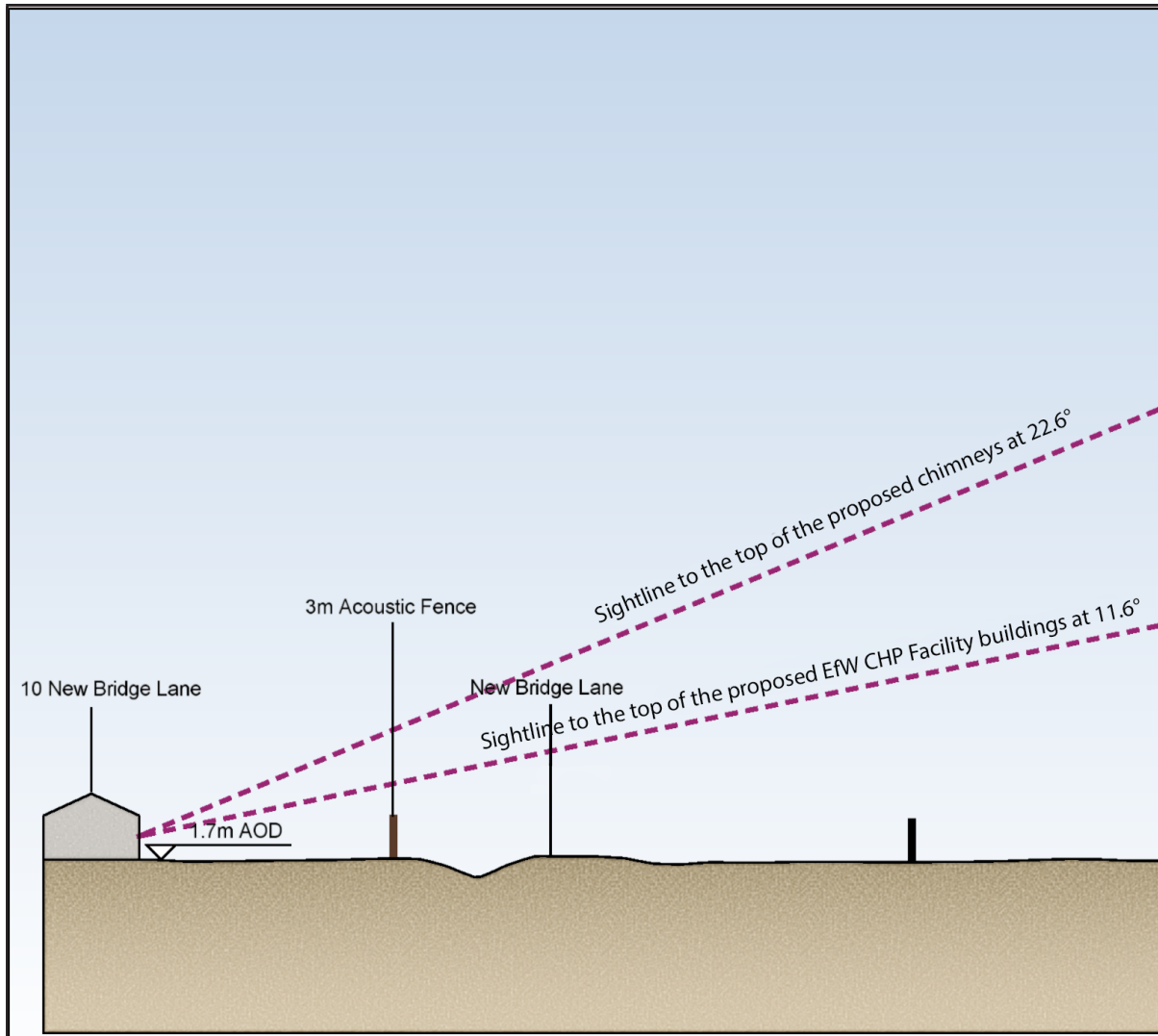


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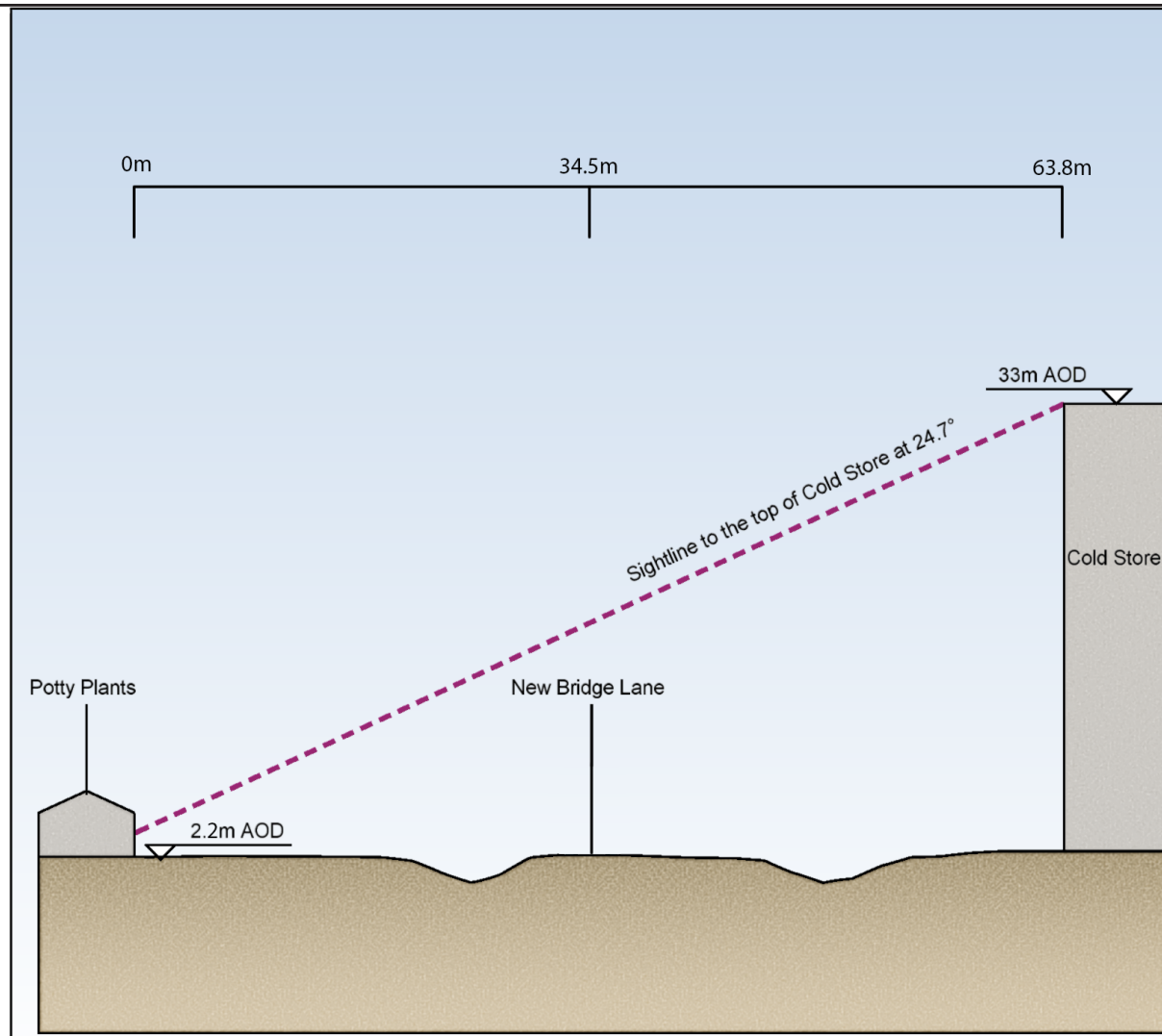
Figure CS1
Cross Section Drawing for 10 New Bridge Lane

October 2022

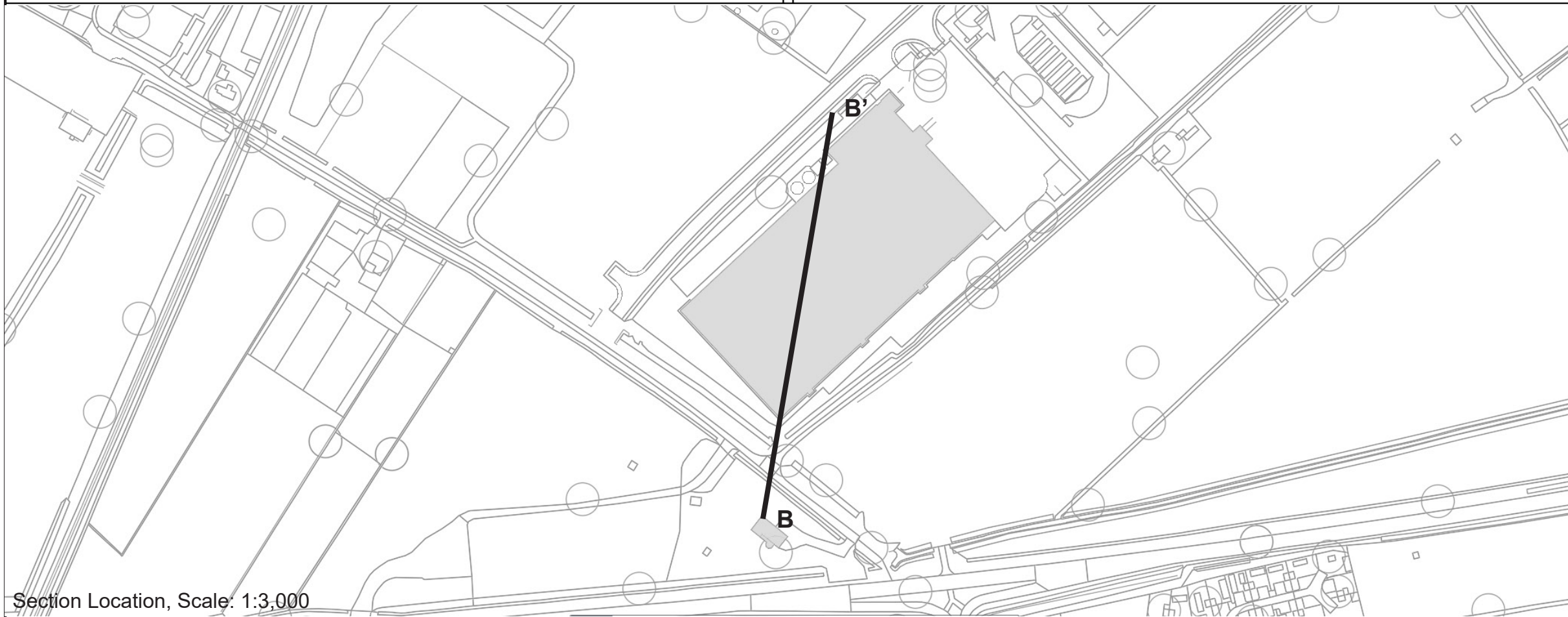




Section A-A', Scale: 1:500



Section B-B', Scale: 1:500



Section Location, Scale: 1:3,000

Key

Client



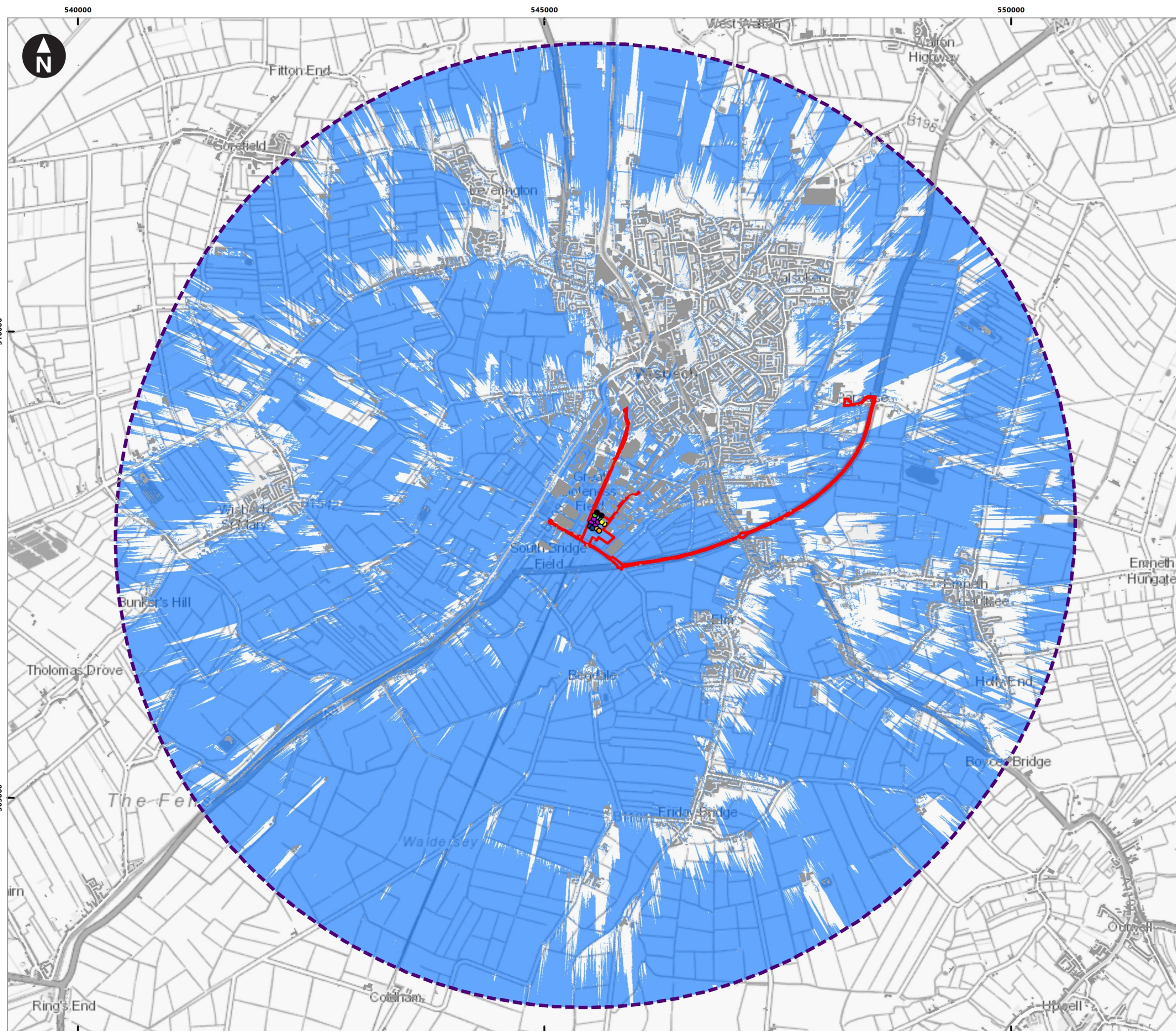
Medworth CHP Limited
Medworth Energy from Waste Combined
Heat
and Power Facility

Figure CS2
Cross Section Drawing for 10 New Bridge Lane and Potty Plants

October 2022



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Key

- Order limits
- 5km offset from centre of main building at EfW CHP Facility

ZTV node locations

- Boiler house
- Waste bunker
- Turbine hall
- Air cooled condenser
- EfW CHP Facility northern edge
- EfW CHP Facility southern edge

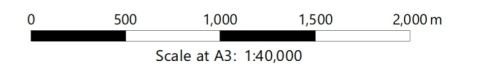
Zone of Theoretical Visibility (ZTV)

This drawing is based upon a computer generated Zone of Theoretical Visibility (ZTV) using the viewshed analysis in the ESRI ArcGIS Suite.

The ZTV is created using Environment Agency 1m LiDAR Digital Surface Model (DSM) data.

The figure has been based on the following parameters where there is an assumed base level of 3 m AOD (above ordnance datum):

- Boiler house x 4 nodes at 52m above FFL (metres above finished floor level);
- Waste bunker building x 2 nodes at 38.5m above FFL;
- Turbine hall x 2 nodes at 27m above FFL;
- Air cooled condenser x 2 nodes at 30m above FFL;
- Tipping hall building x 2 nodes at 18.5m above FFL;
- and
- Air pollution control building x 2 nodes at 37m above FFL.



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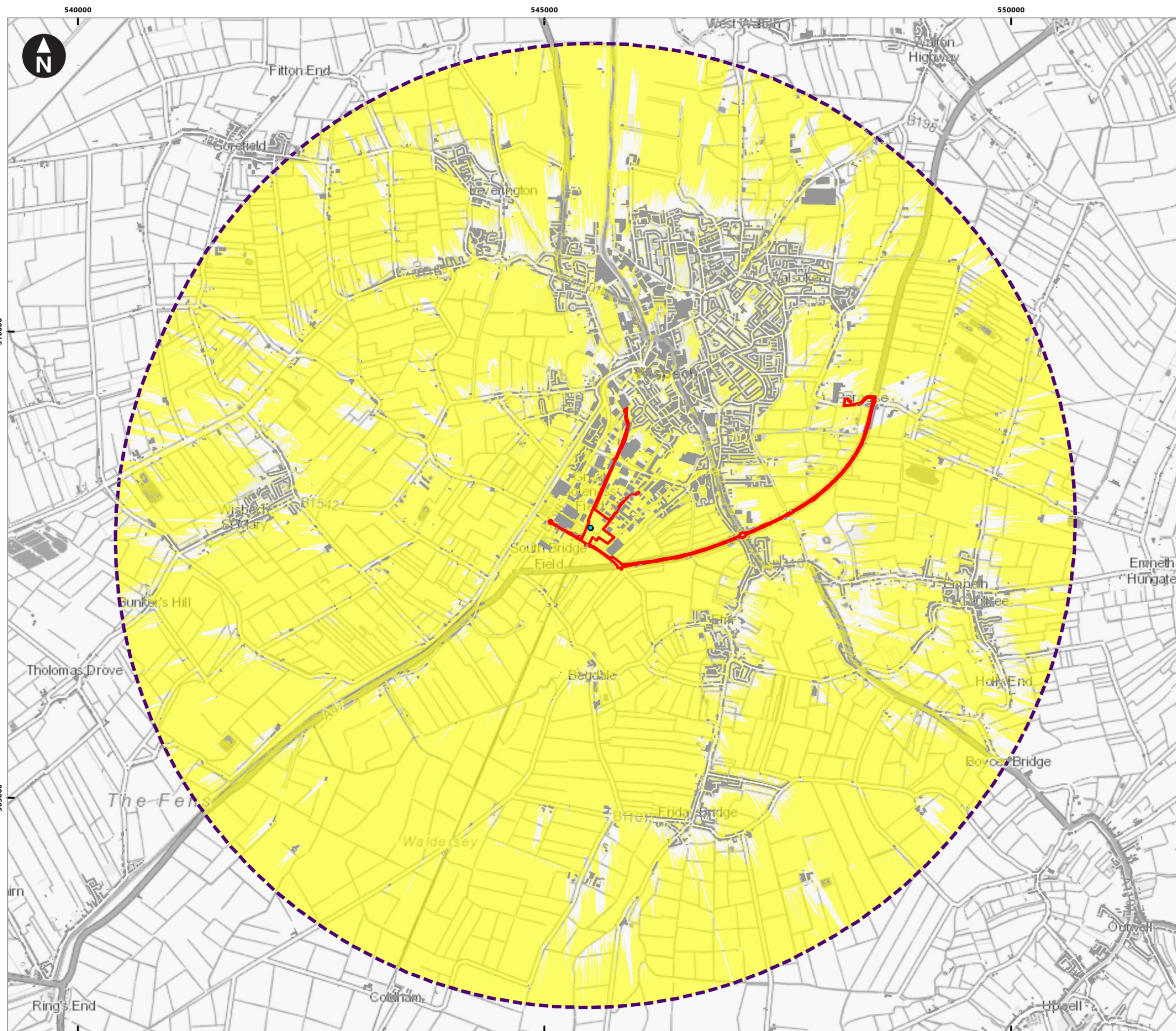
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Figure ZTV1
EfW CHP ZTV within 5km of the centre of the main building in the EfW CHP Facility

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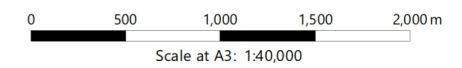
- Key
- Order limits
 - 5km offset from centre of main building at EfW CHP Facility
 - ZTV top of chimney nodes
 - Zone of Theoretical Visibility (ZTV)

This drawing is based upon a computer generated Zone of Theoretical Visibility (ZTV) using the viewshed analysis in the ESRI ArcGIS Suite.

The ZTV is created using Environment Agency 1m LIDAR Digital Surface Model (DSM) data.

The figure has been based on the following parameters where there is an assumed base level of 3 m AOD (above ordnance datum):

Top of chimney x 2 nodes at 90m



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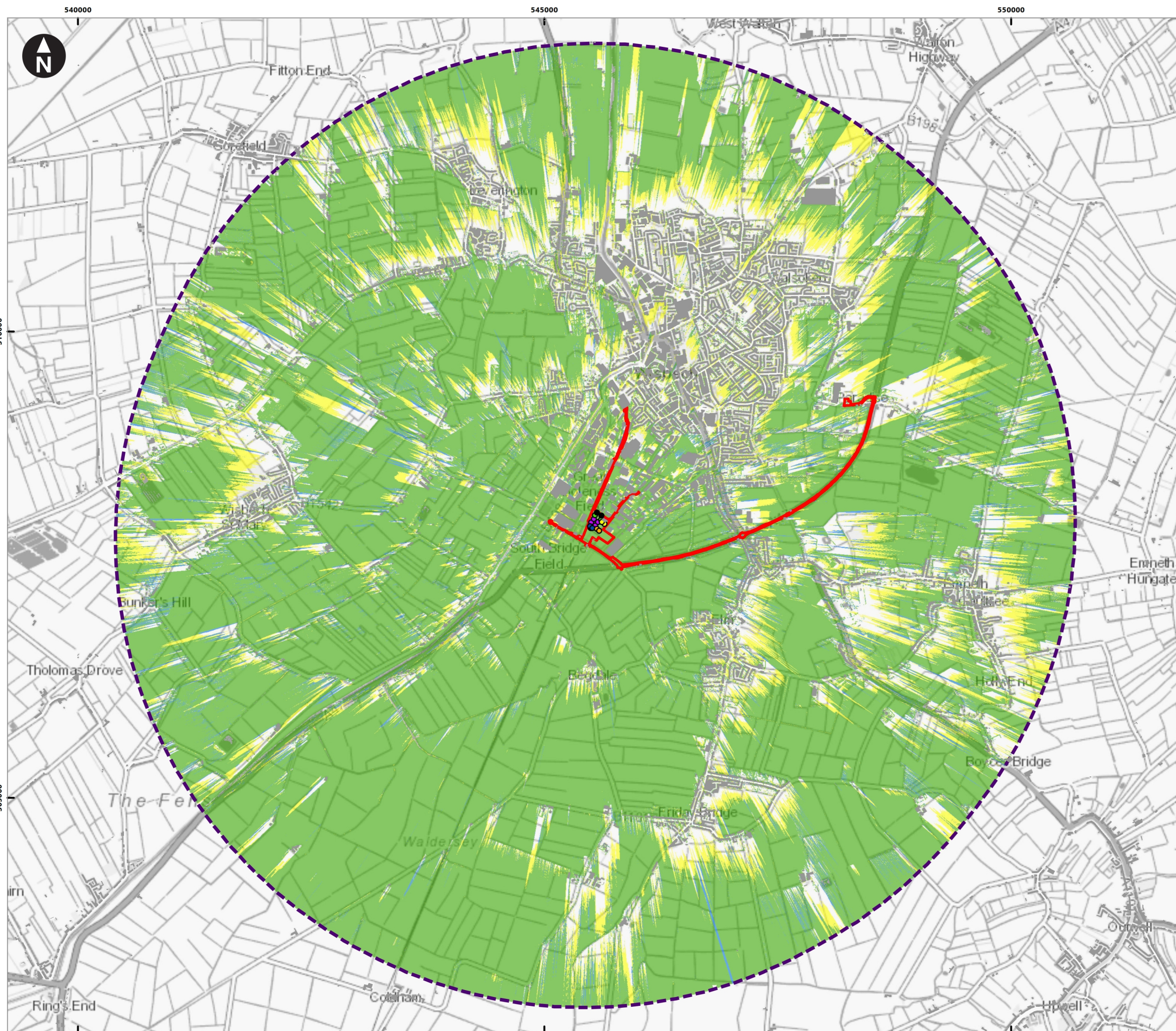
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Figure ZTV2
Chimneys ZTV within 5km of the centre of the main building in the EfW CHP Facility

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Key
 Order limits
 5km offset from centre of main building at EfW CHP Facility

ZTV node locations

- Boiler house
- Waste bunker
- Turbine hall
- Air cooled condenser
- EfW CHP Facility northern edge
- EfW CHP Facility southern edge
- Top of chimney

Zone of Theoretical Visibility (ZTV)

- Only the upper sections of the main building of the EfW CHP Facility would potentially be visible
- Only the 90m high chimney at the main building of the EfW CHP Facility would potentially be visible
- The upper sections of the main building at EfW CHP Facility and the chimney would be visible

This drawing is based upon a computer generated Zone of Theoretical Visibility (ZTV) using the viewshed analysis in the ESRI ArcGIS Suite.

The ZTV is created using Environment Agency 1m LIDAR Digital Surface Model (DSM) data.

The figure has been based on the following parameters where there is an assumed base level of 3 m AOD (above ordnance datum):

- Boiler house x 4 nodes at 52m
- Waste bunker x 2 nodes at 38.5m
- Turbine hall x 2 nodes at 27m
- Air cooled condenser x 2 nodes at 30m
- EfW CHP Facility northern edge x 2 at 18.5m
- EfW CHP Facility southern edge x 2 at 34m
- Top of chimney x 2 nodes at 90m

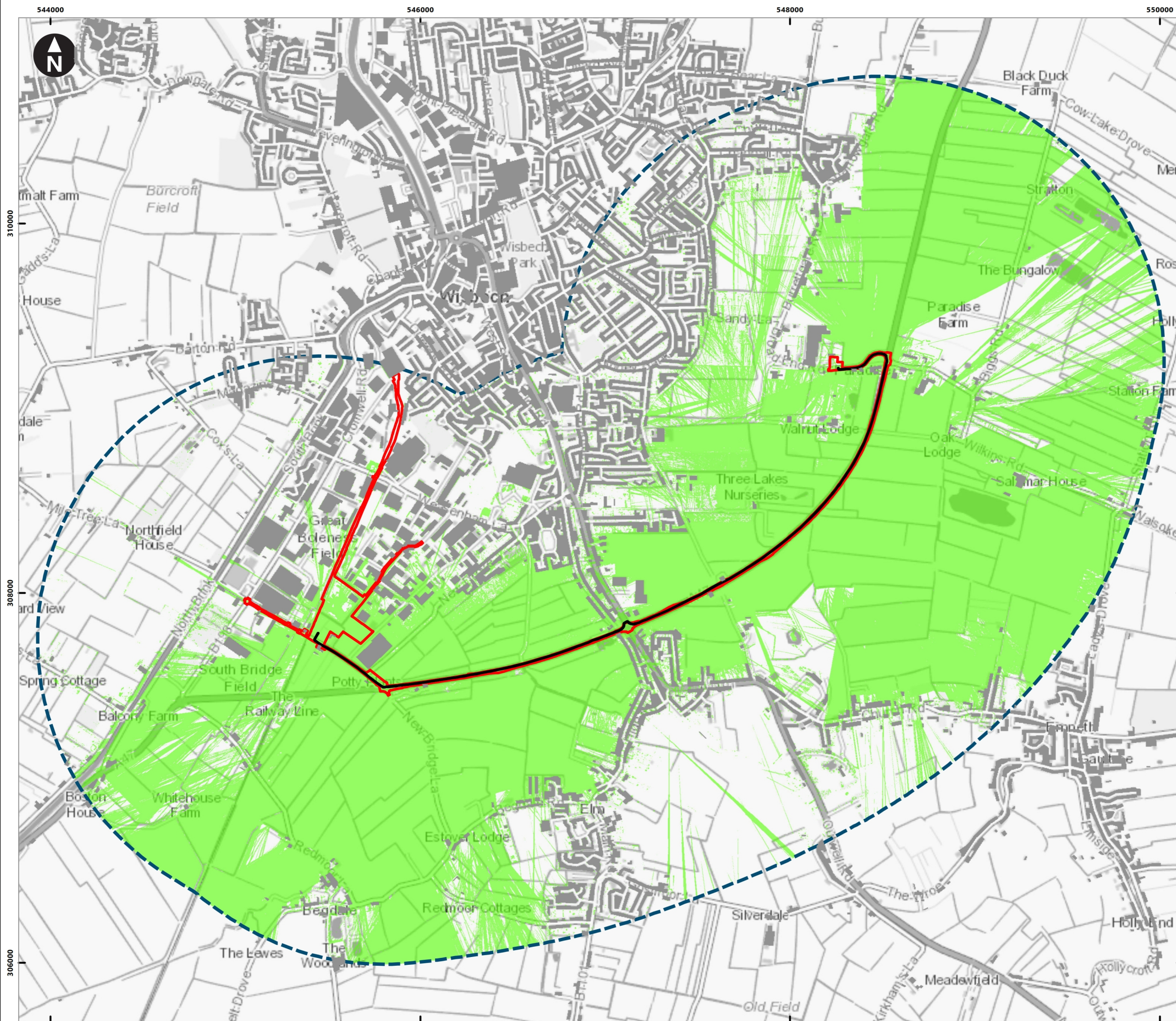
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Figure ZTV3
 Composite ZTV of the main building and chimneys within 5km of the centre of the main building at the EfW CHP Facility

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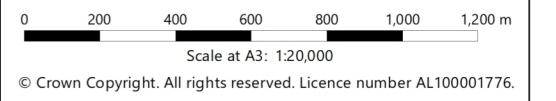
- Key
- Order limits
 - Underground cable construction route
 - Underground cable construction route 1500m buffer
 - Zone of Theoretical Visibility (ZTV)

This drawing is based upon a computer generated Zone of Theoretical Visibility (ZTV) using the viewshed analysis in the ESRI ArcGIS Suite.

The ZTV is created using Environment Agency 1m LiDAR Digital Surface Model (DSM) data.

The figure has been based on the following parameters (in metres Above Ground Level (m AGL)):

Excavator and / or dump truck assumed maximum height at 6 m

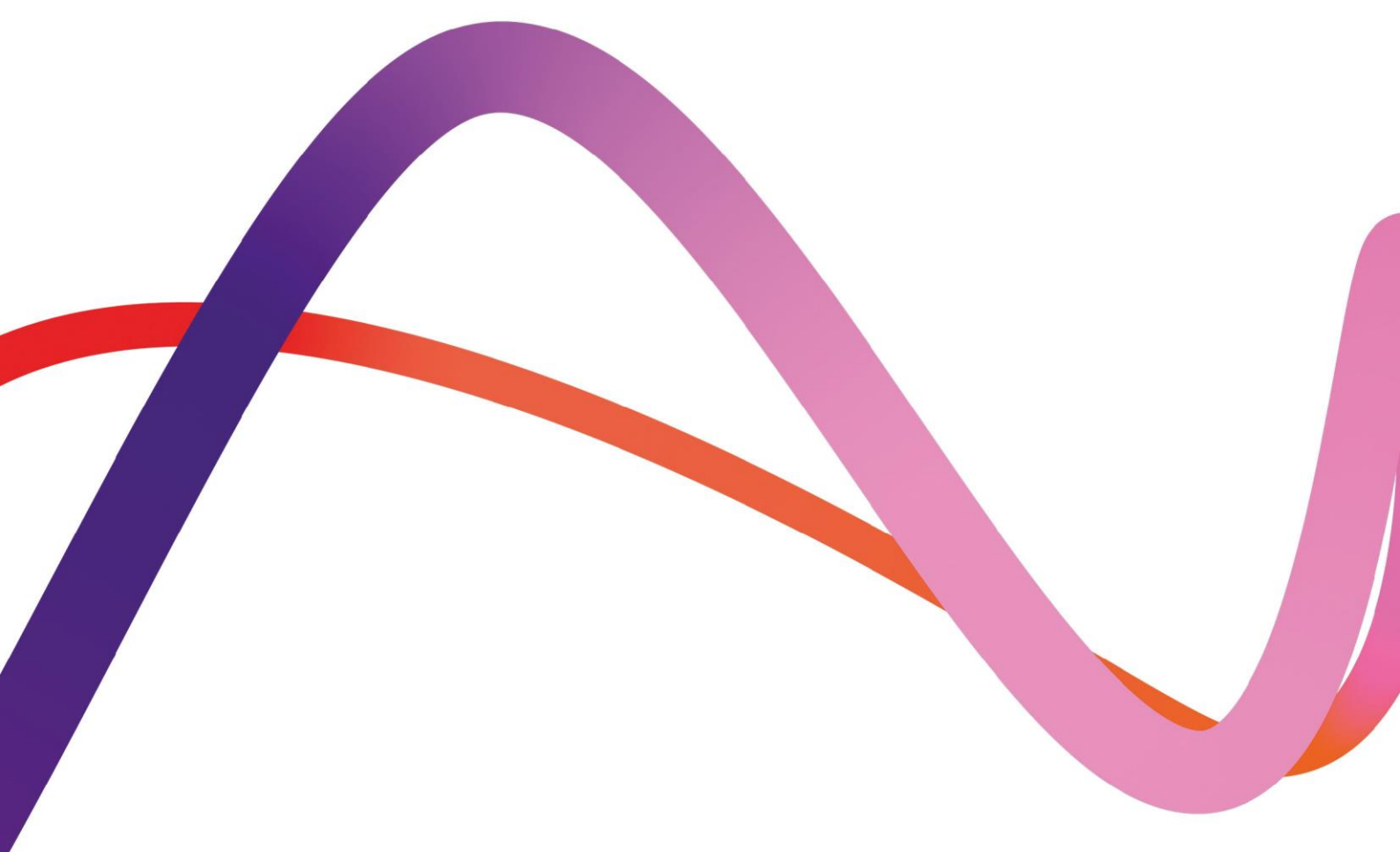


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Figure ZTV4
Grid Connection underground cable construction route ZTV

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Technical Note

Climate Change – Response to CCC Comments

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1. Introduction

1.1.1 Cambridgeshire County Council (CCC) jointly with Fenland District Council (FDC) produced a draft relevant representation (13 October 2022) that they intended to issue to the Planning Inspectorate (PINS) as part of the examination phase of the Medworth Energy from Waste (EfW) Combined Heat and Power (CHP) Facility Development Consent Order (DCO) Application. The DCO Application was submitted by Medworth CHP Ltd (the Applicant).

1.1.2 A meeting was held on 20 October 2022 between the Applicant and their environmental consultants (WSP) and representatives from CCC, and King's Lynn and West Norfolk Council (KLWN), to discuss the comments provided and clarify queries concerning Environmental Statement (**ES**) **Chapter 14: Climate Change (Volume 6.2) [APP-041]**.

1.1.3 This Technical Note provides a response to CCC'S comments in their draft relevant representation as discussed in the meeting held on 20 October 2022.

1.1.4 CCC's comments relating to climate change (page 48 to 51 of their draft relevant representation) include the following summary issues:

- Without development scenario – landfill;
- Waste composition;
- Avoided emissions – grid mix decarbonisation;
- Avoided emissions – grid mix references clarification;
- Avoided emissions – grid mix EfW/landfill gas (LFG) inclusion;
- Embedded measures – construction mitigation;
- Embedded measures – carbon capture and storage (CCS);
- Institute of Environmental Management and Assessment (IEMA) guidance – definition of beneficial significance;
- IEMA guidance – local contextualisation;
- Defra Emissions Factor Toolkit (EFT) – transport emissions; and
- Land use change scoping.

1.1.5 This Technical Note includes the following appendices:

- **Appendix A: Grid mix decarbonisation:** additional sensitivity analysis considering the gradual decarbonisation of the UK Grid and the potential impact on the assessment of avoided emissions; and
- **Appendix B: Carbon capture and storage:** the proposed DCO Requirement on CCS, demonstrating the Applicant's commitment to CCS.



2. Response to CCC comments

2.1.1 Comments provided by CCC and the Applicant’s response to these comments are included in **Table 2.1**.

Table 2.1 Table of comments and responses

Summary issue	Comment	Response
Without development scenario landfill	10.1a The baseline scenario assumes that, without the development, all of the 625,000 tonnes of waste would go to landfill every year for the 40 years of operation. However, this seems very unlikely in any scenario.	The EfW CHP Facility provides an option for the management of residual waste, remaining after the removal of recyclables, which moves the management higher up the waste hierarchy than the alternative ‘without Proposed Development’ scenario where waste is sent to landfill. The Waste Fuel Availability Assessment (Volume 7.3) [APP-094] prepared for the DCO Application identifies that landfill disposal is the reasonable alternative for the management of residual waste proposed to be used at the EfW CHP Facility. The Waste Fuel Availability Assessment (Volume 7.3) [APP-094] also identifies that some residual waste is incorporated in exports of Refuse Derived Fuel (RDF) to northern continental Europe (Netherlands and Germany) and Scandinavia (Sweden, Norway and Denmark), but highlights that RDF exports have been reducing due to recent tax changes ¹ and the increase in the price of haulage making this disposal route a less financially viable option. Additionally, UK Government policy ² is on applying the proximity principle (i.e., managing waste at a location as close as reasonably possible to where waste is generated). Therefore, ES Chapter 14: Climate Change (Volume 6.2) [APP-041] considers a ‘without Proposed Development’ case where waste is collected and transported to available landfill sites.
Waste composition	10.1b The vast majority of emissions in the ‘without development’ scenario are from methane from landfill. The calculation of these emissions is	ES Chapter 14: Climate Change (Volume 6.2) [APP-041] uses the most appropriate information currently available regarding waste composition and determination of associated emissions for landfill and the EfW CHP Facility. This is

¹ The Netherlands implemented the RDF tax which is a €32-per-tonne (£28.75) tax on the import of all foreign waste for incineration. This came into effect on 1 January 2020. Norway introduced a mandatory waste incineration tax of NOK192 (£16) per tonne of fossil-based CO₂, which has been levied on waste delivered to plants in Norway. This came into effect on 1 January 2022.

² Ministry of Housing, Communities and Local Government (2014). National Planning Policy for Waste.



5 Technical Meeting Note – Climate Change

Summary issue	Comment	Response
	<p>imprecise and actual emissions from landfill could vary enormously depending on the biogenic carbon content of the waste composition, and how the particular landfill sites are managed. This total should therefore be treated with caution and regarded as uncertain.</p> <p>10.3 Greenhouse Gas (GHG) emissions from operation of the plant are very high, at over 280,000 tonnes CO₂e per year, or over 11 million tonnes CO₂e over the 40-year lifetime. The vast majority of these emissions are from burning the fossil carbon content of the waste (such as plastics). The actual emissions could vary a lot depending on the particular composition of the waste material.</p> <p>10.6 The scale of emissions is huge, in both scenarios, with and without. the main source of emissions from either waste disposal method (landfill or incineration) are in the same ballpark of around 11 million tonnes CO₂e over 40 years. The composition of the waste is the deciding factor as to which method is lower carbon. In general, fossil carbon waste (such as plastics) generate fewer emissions (actually none) if landfilled, but high emissions if burned. Whereas biogenic carbon waste (such as paper, food and garden waste) generate fewer emissions if burned (by converting methane to CO₂) (although recycling/composting would be even better) but high emissions if landfilled. The assumptions made therefore can easily tip the balance as to which is favourable.</p>	<p>based on WRAP 2017 residual waste composition³, Defra guidance on landfill emissions modelling⁴ and the operating parameters for the EfW CHP Facility.</p> <p>However, it is acknowledged that variation in residual waste composition affects the estimation of GHG emissions associated with EfW and LFG processes, so the ES also includes a sensitivity analysis of waste composition and GHG emissions (Appendix 14C (Volume 6.4) [APP-088]), which considered relevant scenarios for increased recycling and a consequent reduction in recyclable materials entering residual waste. The analysis indicates that with increased recycling the EfW CHP Facility would provide a net saving on GHG emissions compared to landfill. The three cases considered for residual waste composition in the sensitivity analysis are:</p> <ul style="list-style-type: none">• Current residual waste (Core Case): based on WRAP 2017 residual waste composition, assuming this accounts for a recycling rate of 45%.³• Reduced Recyclables: assuming a further 20% reduction in recyclable materials (paper, card, plastics, glass, metals, food, garden, wood and textiles) in the WRAP 2017 residual waste composition (in line with UK Government policy to achieve a 65% recycling for municipal solid waste by 2035⁵).• Reduced Food and Plastics: assuming a 90% reduction in food and plastic in the WRAP 2017 residual waste composition, along with a 20% reduction in other recyclable materials (as for the Reduced Recyclables scenario). <p>There is uncertainty on how waste composition could change in the future, so the sensitivity analysis provides an indication of the broad direction and scale of the impact of emissions attributable to the EfW CHP Facility compared to landfill.</p> <p>The uncertainty regarding waste composition is also apparent in the findings of the Waste Fuel Availability Assessment (Volume 7.3) [APP-094]. The Waste Fuel Availability Assessment highlighted that Waste Collection Authorities (WCAs) within the local Study Area already engage in the separate collection of food waste and considered that whilst the provisions of the Environment Act 2021 and the</p>

³ WRAP (2020). National Municipal Waste Composition, England 2017, Table 3.

⁴ Defra (2014). Review of Landfill Methane Emissions Modelling (WR1908).

⁵ HM Government (2018). *England's National Waste Strategy. OUR WASTE, OUR RESOURCES: A STRATEGY FOR ENGLAND.*



Summary issue	Comment	Response
Avoided emissions – grid mix decarbonisation	<p>10.4 The stated avoided emissions from energy generation are incorrect, as the figures provided by the applicant use a single constant carbon intensity of UK electricity to be offset over the 40-year period. This ignores the forecast gradual decarbonisation of the UK electricity grid over time.</p> <p>10.16 With reference to Table 14.31, it is not clear whether, in the carbon calculations for the ‘without Proposed Development’ and ‘with Proposed Development’ the gradual decarbonisation of the grid been taken into consideration.</p>	<p>Government’s Net Zero Strategy, will undoubtedly have a positive effect on increasing municipal recycling rates, it was questionable that this measure would facilitate the national achievement of a further 21% points in municipal waste recycling, to achieve an overall target of 65%. Therefore, the scenarios considered in the sensitivity analysis (Appendix 14C (Volume 6.4) [APP-088]) may be optimistic in terms of increased recycling rates, particularly with respect to opportunities to decrease the proportion of food (a biogenic carbon source) in residual waste.</p> <p>The UK Grid Average emissions factor for electricity generation, from DUKES (2021)⁶, was used at ES (rather than gas-fired power stations (CCGT)) in response to CCC’s comments at PEIR stage. The approach for the ES has sought to use the most appropriate factor representative of the current UK energy mix for electricity generation. Displacement of conventional fossil fuels is considered to be the most likely scenario for the EfW CHP Facility.</p> <p>Sensitivity analysis in the ES has considered future decarbonisation of electricity generation for the UK grid, which uses BEIS forecasts⁷ for UK Grid average emissions factors to calculate GHG emissions associated with the avoided emissions (Appendix 14C (Volume 6.4) [APP-088]). Further decarbonisation of UK Grid electricity generation towards 2050 would reduce the scale of savings derived from avoided emissions for the EfW CHP Facility, although this would have a similar effect on electricity generated from LFG, so the EfW CHP Facility still delivers a net reduction in emissions.</p> <p>Appendix A includes additional sensitivity analysis considering the gradual decarbonisation of the UK Grid and the potential impact on the assessment of avoided emissions.</p>
Avoided emissions – grid mix references clarification	<p>10.20 In Appendix C Sensitivity Analysis, paragraph 1.1.4: footnote links to 65 and 56 are not correct and the source for the following is queried: CCGT 380tCO₂/GWh; UK Grid 182tCO₂/GWh;</p>	<p>The correct references are included below (any amendment has no impact on the assessment presented):</p> <ul style="list-style-type: none"> • Current CCGT = 380tCO₂/GWh – incorrect reference in ES, this should be reference 76 DUKES (2021) (Table 5.14)⁶.

⁶ BEIS (2021). Digest of UK Energy Statistics (DUKES) 2021.

⁷ BEIS (2021). Treasury Green Book – Data Tables 1-19.



Summary issue	Comment	Response
	<p>2035 UK Grid 23tCO₂/GWh; and 250 UK Grid 6tCO₂/GWh.</p>	<ul style="list-style-type: none"> • Current UK Grid Average (Core Case) = 182tCO₂/GWh – incorrect reference in ES, this should be reference 76 DUKES (2021) (Table 5.14)⁶. • 2035 UK Grid Average = 23tCO₂/GWh – correct reference 56 BEIS (2021) Treasury Green Book (Table 1)⁷. • 2050 UK Grid Average = 6tCO₂/GWh – correct reference 56 BEIS (2021) Treasury Green Book (Table 1)⁷.
<p>Avoided emissions – grid mix EfW/LFG inclusion</p>	<p>10.15 Paragraphs 14.9.37 to 39, this section compared the emissions of electricity generation between the proposed development and the UK Grid. Has MVV considered if the UK Grid itself already incorporates EfW within the grid mix – hence the comparison might not be as black and white as suggested here.</p> <p>10.19 Appendix 14B Assumptions and limitations table (page 34) “<i>offsetting of electricity generation from landfill gas and from the EfW CHP facility</i>”: the assumption made here is that electricity from LFG would displace the UK of average grid electricity. Is this the case, is there a situation where the LFG generated electricity would instead be part of the grid electricity generation mix lowering the average (182g/kwh)?</p>	<p>The current UK Grid Average factor from DUKES (2021)⁶ includes both LFG and EfW generation sources under the category of 'thermal renewable sources'. Assuming LFG and EfW contribute to thermal renewable sources, the effect on the UK Grid Average factor used in the assessment may be about 0.1%, noting that this is within the range of rounding margins for the reported emissions factor and not considered to have a material impact.</p>
<p>Embedded measures construction mitigation</p>	<p>– 10.2 Construction emissions (embodied carbon) are a significant source of emissions, estimated at over 48,000 tonnes CO₂e. Consideration should be given to minimising use of highcarbon materials such as concrete, steel etc, use of low carbon construction methods and materials, such as more use of recycled/reclaimed materials, electrical plant/tools, and locally sourced items.</p>	<p>Table 14.15, ES Chapter 14: Climate Change (Volume 6.2) [APP-041] includes: “<i>The following high-level options have been applied and developed when seeking to reduce GHG emissions on the Proposed Development:</i></p> <ol style="list-style-type: none"> 1. <i>Avoid and prevent: maximise potential for reusing or refurbishing materials, where available, to encourage circular economy processes and explore alternative lower carbon options to deliver the Proposed Development’s objectives.</i> 2. <i>Reduce: apply low carbon solutions (including technologies, materials and products) to minimise resource consumption during the construction, operation and during decommissioning; and construct efficiently: use techniques (i.e., during construction, operation and</i>



Summary issue	Comment	Response
		<p><i>decommissioning) that reduce resource consumption over the life cycle of the Proposed Development.”</i></p>
		<p>Additional detail on measures from the Applicant to reduce GHG emissions during construction include ‘Design with a Low Carbon Approach in Mind’, Designers must take a fully integrated Life Cycle Assessment (LCA) approach to all design decisions. The EfW CHP Facility is to be BREEAM accredited which weighs highly on sustainability: aim for ‘excellent’ for the administrative building and the rest of the facility will achieve a ‘good’ score (see Section 3.4.78, ES Chapter 3: Description of the Proposed Development (Volume 6.2) [APP-030]).</p>
<p>Embedded measures – CCS</p>	<p>10.5 Carbon Capture and Storage (CCS) has not been included in the proposal. CCS is probably necessary in order to reach net zero.</p> <p>10.12 With reference to Table 14.15, is there a reason why CCS is not part of the application? Is this a cost issue? I believe that the CCC suggest that CCS is necessary to be net zero.</p>	<p>As stated in Table 14.15, ES Chapter 14: Climate Change (Volume 6.2) [APP-041]: <i>“The Proposed Development will be carbon capture retrofit ready with land set aside for a CCS facility. However, the Application does not include the construction and operation of the carbon capture technology within the Proposed Development.”</i></p> <p>The Applicant are undertaking a feasibility study of CCS technology and export for the EfW CHP Facility and are in the process of agreeing a DCO Requirement to demonstrate commitments to CCS. The proposed DCO requirement is included at Appendix B.</p>
<p>IEMA guidance – definition of beneficial significance</p>	<p>10.7 The magnitude of changes in GHG emissions as a result of the Proposed Development have been assessed with reference to national policy and national emissions reductions. However, this methodology means that almost no project ever would be regarded as significant, since no site on its own would ever emit a high % of the whole UK’s GHG emissions. The Environmental Statement refers to the latest IEMA guidance, which states that: <i>“GHG emissions have a combined environmental effect that is approaching a scientifically defined environmental limit, as such any GHG emissions or reductions from a project</i></p>	<p>The assessment within ES Chapter 14: Climate Change (Volume 6.2) [APP-041] concludes that:</p> <p>Section 14.9.42 <i>“Relative to the ‘without Proposed Development’ case, the Proposed Development is estimated to result in a net decrease in GHG emissions equivalent to approximately 2,571ktCO₂e over its lifetime.”</i></p> <p>Section 14.9.49 <i>“In accordance with IEMA guidance (2022)⁸ for defining significance (see Table 14.19 Significance criteria for the GHG assessment) it is concluded that the GHG impact of the Proposed Development will have a beneficial Significant effect. The Proposed Development has net GHG emissions below zero,</i></p>

8 IEMA (2022). Environmental Impact Assessment Guide to: Assessing Greenhouse Gas Emissions and Evaluating their Significance – 2nd Edition.



Summary issue	Comment	Response
	<p><i>might be considered to be significant... The crux of significance therefore is not whether a project emits GHG emissions, nor even the magnitude of GHG emissions alone, but whether it contributes to reducing GHG emissions relative to a comparable baseline consistent with a trajectory towards net zero by 2050</i>". However, this guidance does not seem to have been followed. It is not clear how the proposed development could be consistent with a trajectory towards net zero by 2050 or a 1.5 degrees warming scenario.</p> <p>10.8 In any case, the significance of carbon emissions should not be decided by whether these are lower than an alternative landfill scenario, but by whether emissions align with a net zero trajectory. Council Officers do not agree with the conclusion that the Proposed Development will have a 'beneficial Significant effect'. The IEMA guidance states that <i>"Only projects that actively reverse (rather than only reduce) the risk of severe climate change can be judged as having a beneficial effect."</i></p> <p>10.10 In paragraph 14.6.1, MVV are saying that 'the magnitude of changes in GHG emissions' will essentially determine whether this project impact the UK's ability to meet its 2050 net zero target. IEMA states that it's not just the magnitude that matters in determining significance, it is more about the trajectory of annual emissions from the proposed development, and whether these are in line with a 1.5-degree trajectory.</p> <p>10.13 Our Environment consultants disagree with the two statements in paragraph 14.8.25. Adverse effects are not based on the Proposed Development emitting more emissions than the</p>	<p><i>causing an indirect reduction in atmospheric GHG emissions which has a positive impact on the UK Government meeting its carbon budgets/targets."</i></p> <p>The core definition within the IEMA (2022) guidance in Box 3 is: "Beneficial: the project's net GHG impacts are below zero and it causes a reduction in atmospheric GHG concentration, whether directly or indirectly, compared to the without-project baseline. A project with beneficial effects substantially exceeds net zero requirements with a positive climate impact."</p> <p>The above core definition of beneficial significance in the IEMA guidance has been applied in the assessment for ES Chapter 14: Climate Change (Volume 6.2) [APP-041]. IEMA does make further references to beneficial significance:</p> <ul style="list-style-type: none">• Page 25 – <i>"Only projects that actively reverse (rather than only reduce) the risk of severe climate change can be judged as having a beneficial effect."</i> IEMA do not provide a definition of <i>"actively reverse (rather than only reduce)"</i>.• Page 26 – <i>"significant beneficial – this category is reserved for projects with effects that directly or indirectly remove or avoid GHG emissions in the without-project baseline."</i> <p>Based on IEMA's core definition of beneficial significance and the assessment outcomes in ES Chapter 14: Climate Change (Volume 6.2) [APP-041], it is considered that compared to the without-project baseline, the EFW CHP Facility would have a beneficial significant effect.</p>



Summary issue	Comment	Response
	<p>'without Proposed Development' scenario, it is to do with whether these emissions over the lifetime of the project reduce and align with the net zero trajectory. A beneficial effect is defined by IEMA as a project that sequesters emissions from the atmosphere i.e. CCS. This is not the case right now, unless there is a commitment from the developer to install CCS.</p>	
IEMA guidance – local contextualisation	<p>10.9 With reference to paragraph 14.5.1, the change in GHG emissions between the proposed EfW CHP facility and the 'alternative baseline' of landfill should be contextualised against the UK carbon budgets, but that should not be it. No project on its own is large enough to appear 'significant' when compared to UK carbon budgets. This project should also be contextualised against local / regional carbon budgets, as well as the CCCs waste carbon trajectory which are more pertinent comparisons.</p> <p>10.11 Paragraph 14.6.1 mentions the Waste Planning Authorities (WPA). Do the regional WPAs have GHG aspirations/targets/goals that are net zero aligned? If not, aligning to these WPAs is not good enough as they lock in more GHG than is compatible with a net zero trajectory and Policies and Strategies can simply lag behind.</p> <p>10.17 Paragraphs 14.9.49 & 14.12.2 conclude that the Proposed Development will have a 'beneficial Significant effect'. However, the 2022 IEMA guidance that is quoted clearly explains that the only projects that can be viewed as 'beneficial' are projects result in avoided or removed GHG emissions (see page 25 in the guidance). This project does not substantially exceed net zero requirements and avoided emissions and</p>	<p>ES Chapter 14: Climate Change (Volume 6.2) [APP-041] states:</p> <p>Section 14.6.1 <i>"The magnitude of changes in GHG emissions as a result of the Proposed Development are therefore assessed with reference to national policy and national emissions reductions. This assessment is complemented by a qualitative assessment of the change in emissions in the context of regional/local emissions and regional/local policies where applicable."</i></p> <p>Section 14.9.50 <i>"With respect to GHG emissions at a local level, the Proposed Development will receive residual waste from local authorities and businesses in the region that would otherwise be deposited in landfill. Given the net benefits of GHG emissions of the EfW CHP Facility over the alternative landfill disposal, it is considered that the Proposed Development will have a positive contribution in supporting carbon reduction targets and ambitions for carbon neutrality and net zero in areas where landfill would otherwise be used for residual waste. This does not account for the additional benefit that would be achieved through the CHP connection to local businesses. This is considered in the sensitivity testing in Appendix 14C – Sensitivity Analysis (Volume 6.4) but has not been accounted for in the main GHG assessment."</i></p> <p>Section 14.9.51 <i>"At a local level, CCC has a vision to deliver net zero emissions for Cambridgeshire by 2050 while Norfolk County Council are aiming to work towards carbon neutrality by 2030 in the wider area. The assessment above demonstrates that over these timescales the Proposed Development can have a beneficial local effect in terms of achieving these carbon reduction targets, but this will depend on whether landfill would otherwise be used for residual waste management in these regions. The GHG emissions for the 'without Proposed Development' case have been calculated assuming waste is collected and transported to available landfill sites."</i> CCC are currently landfilling their residual</p>



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Summary issue	Comment	Response
	<p>removed/ sequestered emissions should not be confused. MVA did contextualise the Proposed Scheme's carbon emissions with the CCC national budgets, but IEMA suggests further comparisons as very few projects are ever going to anything but a small fraction on national carbon budgets. For example, the Tyndall Centre for Climate Change Research (2022) presented carbon budgets at a local authority level https://carbonbudget.manchester.ac.uk.</p>	<p>waste, and this waste could be redirected to the Medworth EfW CHP Facility (see Table 4.3, Waste Fuel Availability Assessment (Volume 7.3) [APP-094]).</p> <p>The IEMA (2022) guidance⁸ page 27 acknowledges that:</p> <p><i>“It is down to the practitioner’s professional judgement on how best to contextualise a project’s GHG impact.” “The UK has a defined national carbon budget and budgets set by devolved administrations which have been determined as being compatible with net zero and international climate commitments. The starting point for context is therefore the percentage contribution to the national or devolved administration carbon budget as advised by the CCC [Climate Change Committee]. However, the contribution of most individual projects to national-level budgets will be small and so this context will have limited value.”</i> Page 28 – <i>“Where quantified carbon budgets or a net zero trajectory is lacking, a more qualitative or policy-based approach to contextualising emissions to evaluate significance may be necessary. In these instances, uncertainty and the likelihood of effect should be discussed.”</i></p> <p>Table 1 of the IEMA guidance notes limitations associated with local or regional carbon budgets developed by local authorities and researchers (e.g., the Tyndall Centre at the University of Manchester):</p> <ul style="list-style-type: none">• <i>“Effects of GHG emissions are not geographically circumscribed, so a geographic budget (below a national budget defined based on negotiated NDCs to commitments to a global budget agreed through the UNFCCC) is not very meaningful</i>• <i>Displacing GHG emissions from one local authority or region to another within the UK has no benefit</i>• <i>It’s unclear whether emerging local authority or regional budgets will add up coherently to the UK budget”.</i>



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Summary issue	Comment	Response																												
Defra EFT transport emissions	10.14 In Table 14.23, construction transport emissions are reported in ktCO ₂ e (carbon dioxide equivalents) however it is understood that the Defra Emissions Factors Toolkit used to estimate transport emissions only reports in carbon dioxide (CO ₂).	<p>This is correct that the Defra EFT reports as CO₂ – however, the BEIS conversion factors (2022) show that CO₂ is >99% of CO₂e for both cars and LGVs and 98.5% for HGVs (see below table). This is not anticipated to be a material change in emissions which would affect the overall conclusions.</p> <table border="1"> <thead> <tr> <th></th> <th>BEIS 2022 conversion factors</th> <th>Total kg CO₂e per km</th> <th>kg CO₂e of CO₂ per km</th> <th>kg CO₂e of CH₄ per km</th> <th>kg CO₂e of N₂O per km</th> <th>CO₂ as a % of CO₂e</th> </tr> </thead> <tbody> <tr> <td>Car</td> <td>Average car - unknown fuel</td> <td>0.17067</td> <td>0.1694</td> <td>0.00017</td> <td>0.0011</td> <td>99.26%</td> </tr> <tr> <td>HGV</td> <td>All HGVs (all diesel) - average laden</td> <td>0.89061</td> <td>0.87703</td> <td>0.00014</td> <td>0.01344</td> <td>98.48%</td> </tr> <tr> <td>LGV</td> <td>Average van (up to 3.5 tonnes) - unknown fuel</td> <td>0.23099</td> <td>0.22916</td> <td>0.00001</td> <td>0.00182</td> <td>99.21%</td> </tr> </tbody> </table>		BEIS 2022 conversion factors	Total kg CO ₂ e per km	kg CO ₂ e of CO ₂ per km	kg CO ₂ e of CH ₄ per km	kg CO ₂ e of N ₂ O per km	CO ₂ as a % of CO ₂ e	Car	Average car - unknown fuel	0.17067	0.1694	0.00017	0.0011	99.26%	HGV	All HGVs (all diesel) - average laden	0.89061	0.87703	0.00014	0.01344	98.48%	LGV	Average van (up to 3.5 tonnes) - unknown fuel	0.23099	0.22916	0.00001	0.00182	99.21%
	BEIS 2022 conversion factors	Total kg CO ₂ e per km	kg CO ₂ e of CO ₂ per km	kg CO ₂ e of CH ₄ per km	kg CO ₂ e of N ₂ O per km	CO ₂ as a % of CO ₂ e																								
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Land use change scoping	10.18 With reference to the EIA scoping, Table 14.A.1, land use change should be scoped out as its unlikely that carbon emissions associated with excavation works and sequestration are likely to be very small / immaterial. However, the point made that land use change is usually calculated on a national level needs explanation.	Land use change has been scoped out on the basis of no likely significant effects. The current site land use is brownfield. Given the scale and nature (i.e., proportionately low sequestered GHG emissions in comparison to woodland areas or peat bogs) the effect of GHG emissions on the global climate, arising from land use change, will be minimal.																												



Appendix A

Grid mix decarbonisation

Background

In response to **ES Chapter 14: Climate Change (Volume 6.2) [APP-041]** CCC commented that the stated avoided emissions from energy generation are incorrect, as the figures provided use a single constant carbon intensity of UK electricity to be offset over the 40-year period, which it was considered ignores the forecast gradual decarbonisation of the UK electricity grid over time.

For the purposes of the assessment in the ES, to provide a conservative estimate of avoided emissions it was assumed that rather than displacing electricity generated by fossil fuels, the electricity generated by the EfW CHP Facility (Proposed Development case) and LFG (without Proposed Development case) would displace UK Grid Average electricity generation. The ES provided sensitivity analysis for this 'Core Case' approach (**Appendix 14C (Volume 6.4) [APP-088]**) by considering scenarios for future decarbonisation of electricity generation for the UK grid towards 2050, as well as a scenario that considered the existing generation of electricity from fossil fuels (in line with guidance from Defra that electricity generation from CCGT is a reasonable substitute for energy generated by EfW plants⁹).

Based on BEIS forecasts⁷ for UK Grid Average emissions factors, the analysis identified that further decarbonisation of UK Grid electricity generation would reduce the scale of annual savings derived from avoided emissions for the EfW CHP Facility although this would have a similar effect on electricity generated from LFG, so the EfW CHP Facility still delivers a net reduction in emissions. For the CCGT scenario, representative of the current Defra guidance, the sensitivity analysis indicated that annual savings for avoided emissions for the EfW CHP Facility would be higher (>80%) than that presented in the Core Case used for the ES.

It is acknowledged that with respect to the future decarbonisation scenarios the sensitivity analysis was focussed on a comparison of annual avoided emissions for two representative years: 2035 and 2050, and in response to CCC's comments it would be beneficial to include sensitivity analysis that considers forecasts for UK electricity grid mix decarbonisation over a 40-year timeframe for the lifetime of the EfW CHP Facility. This appendix provides a comparison of the lifecycle GHG emission estimates presented in the ES (**Table 14.31, ES Chapter 14: Climate Change (Volume 6.2) [APP-041]**), with GHG emissions estimates that consider the potential for gradual decarbonisation of the UK electricity grid mix.

Avoided emissions

Environmental Statement

The ES used energy statistics produced by BEIS and published in DUKES 2021⁶ to determine avoided emissions associated with the displacement of UK Grid Average

⁹ Defra (2014). Energy from waste. A guide to the debate.



electricity generation for electricity generated by the EfW CHP Facility and LFG. Based on data for 2020-21, the estimated CO₂ emission per unit of electricity generated for all fuel types in the UK grid electricity used in the ES Core Case was 182 tCO₂/GWh on average. This Grid Average emissions factor was then applied to the net energy outputs estimated for both the EfW CHP Facility and LFG to determine the related avoided emissions (**Section 14.9, ES Chapter 14: Climate Change (Volume 6.2) [APP-041]**). The avoided emissions used in the ES Core Case for electricity generated by the EfW CHP Facility and LFG over 40 years are summarised in **Table A.1**.

Table A.1 Environmental Statement – avoided emissions

	EfW CHP Facility	LFG
Annual electricity generated (MWh)	440,000	110,085
UK grid CO ₂ electricity generation emissions factor (tCO ₂ /GWh)	182	
Equivalent CO ₂ offset for electricity generation (ktCO ₂ e/yr)	80.08	20.04
Total avoided emissions over 40 years (ktCO₂e)	<u>3,203.20</u>	<u>801.42</u>

Forecast grid mix decarbonisation

To take account of the future decarbonisation of UK grid electricity generation, the additional sensitivity analysis in this appendix uses the BEIS forecasts⁷ for UK Grid Average emissions to cover the 40-year timeframe for the EfW CHP Facility. Assuming the EfW CHP Facility would be operational from 2026, the 40-year timeframe considered for the analysis and associated UK grid electricity generation emissions factors is 2026 to 2065 inclusive.

As for the ES, the BEIS forecast emissions factors for UK grid electricity generation for the period 2026 to 2065 have been applied to the net energy outputs estimated for the EfW CHP Facility and LFG. The related emissions factors and estimated 40-year avoided emissions for the EfW CHP Facility and LFG are summarised in **Table A.2**. This indicates that for both the EfW CHP Facility and LFG, over 40 years the scale of avoided emissions based on forecast emissions factors would be 10% of those calculated for the ES Core Case, although as identified in the original sensitivity analysis, total avoided emissions are still greater for the EfW CHP Facility than for LFG.

Table A.2 Grid mix decarbonisation – avoided emissions

	EfW CHP Facility	LFG
Annual electricity generated (MWh)	440,000	110,085



Year	Forecast UK grid CO ₂ electricity generation emissions factor (tCO ₂ /GWh)	EfW CHP Facility		LFG
		Equivalent CO ₂ offset for electricity generation (ktCO ₂ e)		
2026	84.33	37.10		9.28
2027	69.79	30.71		7.68
2028	64.53	28.39		7.10
2029	60.42	26.59		6.65
2030	47.96	21.10		5.28
2031	37.98	16.71		4.18
2032	32.82	14.44		3.61
2033	28.51	12.54		3.14
2034	25.88	11.39		2.85
2035	23.09	10.16		2.54
2036	19.10	8.40		2.10
2037	16.99	7.47		1.87
2038	16.59	7.30		1.83
2039	15.71	6.91		1.73
2040	14.24	6.26		1.57
2041	11.82	5.20		1.30
2042	11.22	4.93		1.23
2043	10.99	4.83		1.21



		EfW CHP Facility	LFG
2044	10.33	4.54	1.14
2045	8.77	3.86	0.97
2046	7.96	3.50	0.88
2047	7.34	3.23	0.81
2048	6.97	3.07	0.77
2049	6.48	2.85	0.71
2050	6.37	2.80	0.70
2051	6.37	2.80	0.70
2052	6.37	2.80	0.70
2053	6.37	2.80	0.70
2054	6.37	2.80	0.70
2055	6.37	2.80	0.70
2056	6.37	2.80	0.70
2057	6.37	2.80	0.70
2058	6.37	2.80	0.70
2059	6.37	2.80	0.70
2060	6.37	2.80	0.70
2061	6.37	2.80	0.70
2062	6.37	2.80	0.70
2063	6.37	2.80	0.70



		EfW CHP Facility	LFG
2064	6.37	2.80	0.70
2065	6.37	2.80	0.70
Total avoided emissions over 40 years (ktCO₂e)		<u>326.37</u>	<u>81.65</u>

Lifecycle emissions

The ES provided a comparison of estimated lifecycle GHG emissions for the LFG ('without Proposed Development') and EfW CHP Facility ('with Proposed Development') cases (**Table 14.31, ES Chapter 14: Climate Change (Volume 6.2) [APP-041]**). The lifecycle GHG emissions summary table has been replicated in this appendix to provide a comparison with the 40-year avoided emissions estimated for forecast UK grid electricity generation in this sensitivity analysis (see **Table A.3** below – note: there are no changes to the estimated GHG emissions for the construction, operation of decommissioning stages resulting from this sensitivity analysis).

Summary

Compared to the results presented in the ES, considering current forecasts for decarbonisation of UK grid electricity generation, the net savings in GHG emissions compared to LFG would be reduced from 2,571 ktCO₂e to 414 ktCO₂e over its lifetime. However, as identified in the ES Core Case and the previous sensitivity analysis, this additional sensitivity analysis for lifetime grid mix decarbonisation shows that GHG emissions will still be lower in the 'with Proposed Development' case compared to the 'without Proposed Development' case, albeit at a reduced scale.

As stated previously, the assumption that electricity generated by the EfW CHP Facility would displace UK grid average electricity generation is considered to be a conservative approach. If the sensitivity analysis takes account of lifetime avoided emissions for replacing electricity generated by CCGT (as per current Defra guidance and assuming an emissions factor for electricity generation from natural gas of 380 tCO₂/GWh⁶), then the net savings in GHG emissions compared to LFG are estimated to be approximately twice that indicated in the ES Core Case, at 5,167 ktCO₂e over the lifetime of the EfW CHP Facility.



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Table A.3 GHG emission estimates during the lifecycle of the Proposed Development case and without Proposed Development case, and comparison against the sensitivity analysis for forecast grid mix decarbonisation

Stage of Proposed Development	Main stage of Proposed Development life cycle	Environmental Statement: estimated emissions		Grid Mix Decarbonisation: estimated emissions	
		'Without Proposed Development' case	'With Proposed Development' case	'Without Proposed Development' case	'With Proposed Development' case
		(ktCO ₂ e)	(ktCO ₂ e)	(ktCO ₂ e)	(ktCO ₂ e)
Construction	A1 – A5 Construction	-	48.38	-	48.38
Operation	B2 – B5 Maintenance, repair, replacement and refurbishment*	-	4.91	-	4.91
	B6 Operational energy	25.04	10,933.05	25.04	10,933.05
	B7 Operational water	-	0.24	-	0.24
	B8 Other operational processes: Landfill	11,489.35	-	11,489.35	-
	B8 Other operational processes: Operational transport	103.85	271.68	103.85	271.68
	B8 Other operational processes: IBA and APCr	-	142.60	-	142.60
Decommissioning	C1 – C4 End of life	-	48.38	-	48.38
General	D Avoided emissions	-801.42	-3,203.20	-81.65	-326.37
TOTAL		10,816.83	8,246.03	11,536.59	11,122.88
Net change in GHG emissions resulting from the Proposed Development (ktCO₂e)		-	-2,570.80	-	-413.71

* Assumed to be equivalent to construction



Appendix B

Carbon capture and storage

The proposed DCO Requirements on CCS are proposed to state:

Carbon capture readiness reserve space

[22]. Following commencement of the authorised development and until such time as the authorised development is decommissioned, the undertaker must not, without the consent of the Secretary of State—

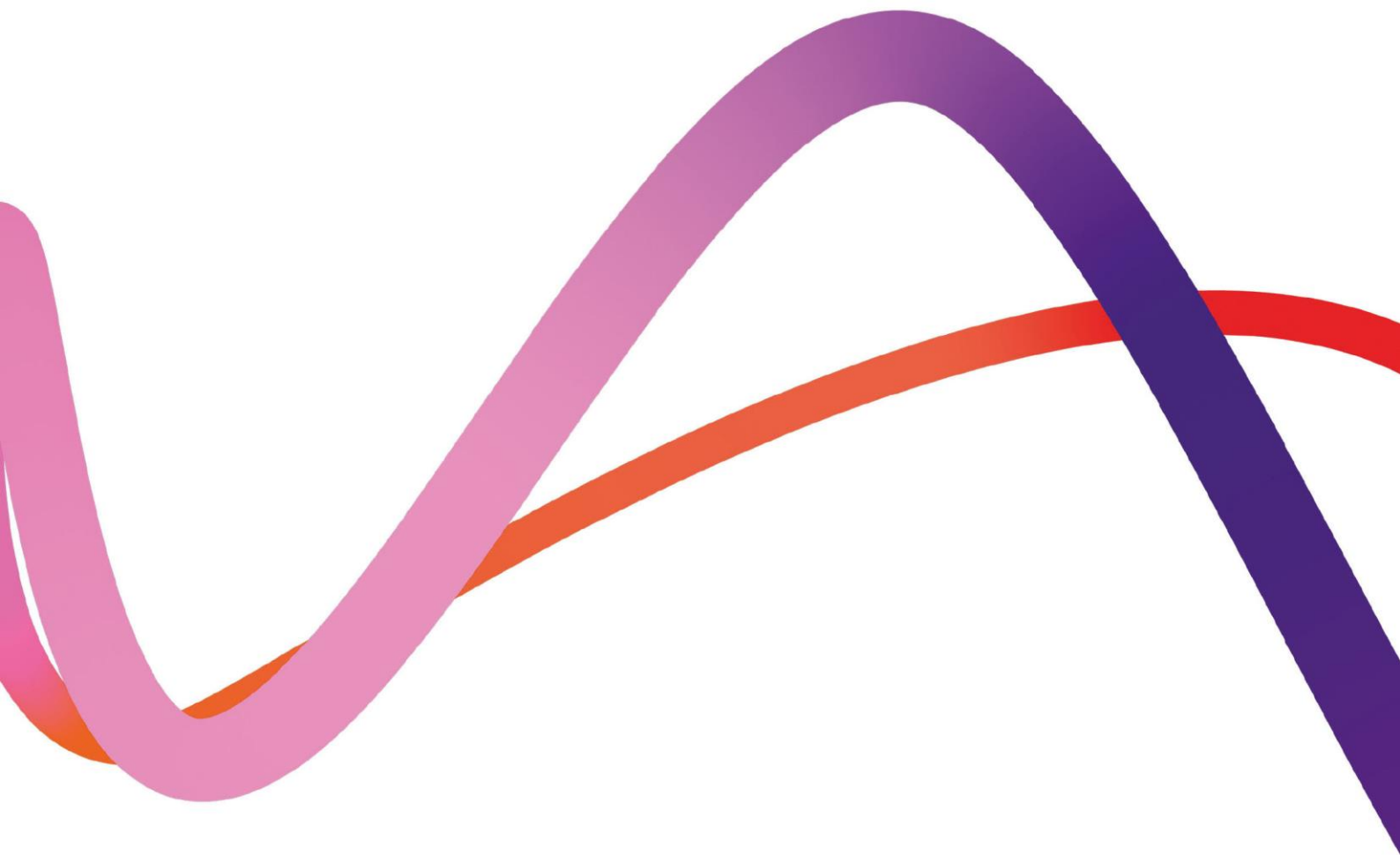
- (a) dispose of any interest in the carbon capture and export readiness reserve space; or
- (b) do anything, or allow anything to be done or to occur which may reasonably be expected to diminish the undertaker’s ability to prepare the carbon capture readiness reserve space for the installation and operation of carbon capture and export equipment within two years of such action or occurrence, should it be deemed feasible to do so.

Carbon capture readiness monitoring report

[23].—(1) The undertaker must make a report (“carbon capture and export readiness monitoring report”) to the Secretary of State—

- (a) on or before the date which is three months after the date of Work No. 1A full commissioning; and
 - (b) within one month of the second anniversary, and each subsequent even-numbered anniversary, of that date.
- (2) Each carbon capture and export readiness monitoring report must provide evidence that the undertaker has complied with Requirement [22]—
- (a) in the case of the first carbon capture and export readiness monitoring report, since commencement of the authorised development; and
 - (b) in the case of any subsequent report, since the making of the previous carbon capture and export readiness monitoring report,
- and explain how the undertaker expects to continue to comply with Requirement [22] over the next two years.
- (3) Each carbon capture and export readiness monitoring report must state whether the undertaker considers the retrofit of carbon capture and export technology is feasible explaining the reasons for any such conclusion and whether any impediments could be overcome.
- (4) Each carbon capture and export readiness monitoring report must state, with reasons, whether the undertaker has decided to seek any additional regulatory clearances, or to modify any existing regulatory clearances, in respect of any carbon capture and export readiness proposals.

[Where “export” means removing the carbon from the Site and transporting it to a place of usage or sequestration to avoid its release to the atmosphere].



Medworth Energy from Waste Combined Heat and Power Facility

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Deadline: 1
March 2023



Appendix 9.2D Technical Note Responses to the Waste Fuel Availability Assessment Representations

**We inspire
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1. Introduction

- 1.1.1 Relevant representations have been submitted to the Planning Inspectorate (PINS) as part of the examination phase of the Medworth Energy from Waste (EfW) Combined Heat and Power (CHP) Facility Development Consent Order (DCO) Application (hereinafter referred to as the Proposed Development). The DCO Application was submitted by Medworth CHP Ltd (the Applicant).
- 1.1.2 This Technical Note provides a response to the various relevant representations received in respect of issues concerning the availability of fuel for the Proposed Development.



2. Summary of Representations

2.1 Overview of representations received

2.1.1 The following statutory parties have raised issues relating to the availability of fuel to the Proposed Development:

- Cambridgeshire County Council (CCC) [RR-002] (joint representation with FDC).
- Fenland District Council (FDC) [RR-003].
- Borough Council of Kings Lynn and West Norfolk (BKLWN) [RR-001].
- Wisbech Town Council - consultee reference [RR-010].

2.1.2 Relevant representations have also been received from a further 61 Interested Parties which include points relating to the waste fuel availability assessment as follows:

- Non-statutory organisations:
 - ▶ Council for the Protection of Rural England (CPRE) [RR-032];
 - ▶ Kings Lynn Without Incineration Network (KLWIN) [RR-044];
 - ▶ Peterborough, Fenlands and King's Lynn Community Branch (LE/00021) of Unite the Union [RR-053];
 - ▶ UK Without Incineration Network (UKWIN) [RR-055];
- Parish/ Town Councils:
 - ▶ Snettisham Parish Council [RR-006];
 - ▶ South Wootton Parish Council [RR-007];
- Local businesses:
 - ▶ Taylor's Reclaims Ltd [RR-051];
 - ▶ Hutchinson's [RR-359]; and
- 55 other Interested Parties (including Councillors).

2.1.3 The remainder of this Technical Note seeks to respond to the key themes raised by the representations received in respect of the issues covered by the **Waste Fuel Availability Assessment (WFAA) (Volume 7.3) [APP-094]**.



3. Statutory Parties

3.1 Introduction

3.1.1 Taking each of the statutory parties in turn, this section of the Technical Note seeks to summarise the key themes raised by representations of the statutory parties and to provide the Applicant's response to the points made.

3.2 Cambridgeshire County Council (CCC) and Fenland District Council (FDC)

Overview of representation

3.2.1 Submitted as a joint representation [RR-002 and RR-003], there are 2 areas of concern identified by CCC and FDC in respect of fuel availability / waste need issues. These are:

- **Topic 1:** Query relating to the ability of the Proposed Development to receive R1 status.
- **Topic 2:** Compliance with Policies 3 and 4 of the MWLP.

Topic 1: R1 status

CCC and FDC representation

3.2.2 The representation states:

*“Paragraph 2.2.5 of the **Waste Fuel Availability Assessment (Volume 7.3) [APP-094]** states that for energy generation to be considered as waste treatment (rather than disposal) it must achieve a minimum level of energy recovery efficiency, as specified in the revised Waste Framework Directive (rWFD). There is a footnote to this paragraph stating that the Proposed Development will be designed to meet the relevant energy recovery co-efficient (i.e., R1 of 0.65). However, the Council has been unable to identify the documentation detailing how this will be achieved and if it requires both heat and power recovery to be operating to achieve the required energy recovery co-efficient. If the Proposed Development cannot achieve the required level of energy recovery efficiency it will be regarded as a waste disposal operation under the rWFD, and not a recovery operation. The Council requests the applicant provide further detail so that there is clarity on this issue, and it may inform the Council's Local Impact Report.”*

Applicant response

3.2.3 The EfW CHP Facility has a design R1 value of 0.81 (0.90 with application of climate change correction factor based on regional heating degree day analysis) at design load conditions (DLC) without the export of heat, ensuring that the installation can



be classed as an energy recovery operation irrespective of the level of heat export. A CHP-R assessment and details of the R1 calculation have been submitted as part of a permit application and is attached at **Annex A** of this Technical Note. Operational data will be collected during commissioning and each subsequent year, with a re-assessment of the R1 calculation made to ensure the EfW CHP Facility does/can continue to achieve R1 status.

Topic 2: Compliance with the Minerals and Waste Local Plan

CCC and FDC representation

3.2.4 In respect of compliance with the extant Minerals and Waste Local Plan (the Cambridgeshire and Peterborough Minerals and Waste Local Plan 2036 – adopted July 2021), CCC and FDC’s key points are as follows:

- **Alternative recovery capacity:** The **WFAA (Volume 7.3) [APP-094]** considers “existing capacity of energy recovery facilities within the study area and within England. It does not appear to consider other forms of recovery capacity.”
- **Net-self-sufficiency:** CCC and FDC consider that the Proposed Development does not comply with policy 3 of the extant Minerals and Waste Local Plan, which sets out that Cambridgeshire County Council and Peterborough City Council seek to achieve net self-sufficiency in respect of waste management provision. CCC and FDC’s position is that even if the Peterborough Green Energy Project (PGEL) at Storey’s Bar Road, Fengate, Peterborough (595ktpa) facility is not built, the Proposed Development would still result in an over-provision of capacity of between 350,000 – 390,000 tonnes per annum.

Allied to this, it is highlighted that Cambridgeshire are signatories to a Memorandum of Understanding between the Waste Planning Authorities of the East of England (March 2019), which sets out that the signatories seek to provide for net self-sufficiency in waste management capacity. This means that the signatories can plan in confidence that they only are required to meet the need of their area, unless it has been explicitly raised by another authority; and that by planning to provide for the needs of only that area, there is an appropriate distribution of waste management facilities in locations proximate to the waste arisings.

Related to this issue of net self-sufficiency, CCC believes it would assist the Examination, if the applicant were to produce:

- ▶ A map or series of maps showing the location of waste currently being disposed of to landfill, the key road linkages, and the location of existing and permitted EfWs and their capacities (if the existing and permitted were distinguished on the map this would also be helpful).
- ▶ A statement explaining how the proximity principle will operate in practice, e.g., what is there to prevent the operator accepting a contract to manage waste from locations outside the study area such as London?



- **The waste hierarchy:** CCC and FDC consider that the Proposed Development does not comply with the provisions of the first element of Policy 4 (Providing for Waste Management) of the extant MWLP, which requires the movement of waste up as far up the waste hierarchy of possible. Specifically, CCC state that it should be demonstrated that waste which *could* be treated further up the waste management hierarchy would not be recovered at the Proposed Development. Related to this, CCC and FDC's position is that incinerators can be wasteful and detract from recycling.

Applicant response

Consideration of alternative recovery capacity

3.2.5 Defra's Guidance on applying the waste hierarchy (*Guidance on Applying the Waste Hierarchy*, June 2011) notes in section 1 (page 3) that 'other recovery' comprises: anaerobic digestion, incineration with energy recovery, gasification and pyrolysis which produce energy (fuels, heat and power) and materials from waste; some backfilling. However, the document also goes on to outline in section 2.2 that for residual 'black bag' (the waste stream which is the focus of the **WFAA (Volume 7.3) [APP-094]**), 'recovery' waste management options comprise:

- Solid recovered fuel derived from mechanical heat treatment (MHT) or mechanical biological treatment (MBT), where it replaces coal;
- Energy Recovery, all technologies (Heat Only);
- Energy Recovery, all technologies (CHP);
- Energy Recovery, all technologies (Electricity Only); or
- MBT or MHT outputs used as fuel (but do not replace coal).

3.2.6 For both the local and national analysis, the **WFAA (Volume 7.3) [APP-094]** has sought to consider the extent to which there is a need for additional residual waste management capacity by reviewing operational capacity; capacity under construction; consented capacity (but not built); and capacity in the planning system. The purpose of this review was to validate the findings of two key studies that the **WFAA (Volume 7.3) [APP-094]** relies on. These are:

- Landfill and Residual Treatment Capacity in the Wider South-East of England, Report for the East of England Waste Technical Advisory Body; the Southeast Waste Planning Advisory Group; and the London Waste Planning Forum, Sacks Consulting (May 2021).
- The UK Energy from Waste Statistics - 2020, Tolvik Consulting Ltd (May 2021).

3.2.7 A review of EfW capacity is set out in Appendix C to the **WFAA (Volume 7.3) [APP-094]**.



3.2.8 The Waste Local Plan capacity gap assessments that the **WFAA (Volume 7.3) [APP-094]** relies upon include all forms of final disposal – including MBT and AD.

3.2.9 In terms of MBT, Waterbeach is the only operational facility in the Study Area and its full capacity has been included in the **WFAA (Volume 7.3) [APP-094]**. However, it must be noted that the capacity assessment in the extant Cambridgeshire Waste Local Plan relies on all 200,000 tonnes per annum capacity of this facility as final disposal capacity. This is simply not the case. A significant proportion of the 200,000 tonnes throughput emerges from the plant as refuse derived fuel. This must then either be sent for recovery or disposed of in landfill. The Applicant has therefore assumed in the **WFAA (Volume 7.3) [APP-094]** that a conservative assumption of 50% of MBT input emerges from the plant as refuse derived fuel.

3.2.10 Whilst the Applicant has therefore had regard to the existing Waterbeach MBT facility in the **WFAA (Volume 7.3) [APP-094]**, the contribution this capacity (and the capacity of other MBTs) make to the final disposal of waste is likely to be over-stated in the need assessment contained in the Cambridgeshire and Peterborough Waste Local Plan.

3.2.11 The Applicant has also considered whether any new MBT will come forward during the operational life of the Proposed Development and considers this unlikely because:

- The MBT process is not considered cost effective when measured against recovery of residual waste via EfW.
- Recent failures of MBT facilities servicing long term local authority contracts have occurred in Essex and Derby, with the Essex facility contract terminated and the plant due to be demolished.
- There is no evidence to suggest that the existing MBT facilities delivering long term local authority contracts in the UK will be renewed on contract expiry.

3.2.12 In terms of capacity offered by AD plants an updated position has not been considered in the **WFAA (Volume 7.3) [APP-094]**. This is because such capacity does not represent a direct replacement for the Proposed Development. Waste treated by AD plants is collected separately and comprises a category of waste that the Proposed Development would not seek to take. Furthermore, the **WFAA (Volume 7.3) [APP-094]** has only considered the availability of residual waste – this is the portion of the waste stream that is left over after all recycling has taken place. As waste for AD plants is collected separately e.g., food waste, the fuel availability assessment assumes that material which would be treated at an AD facility would not be available to the Proposed Development.

Net self-sufficiency

3.2.13 Policy 3 of the adopted Cambridgeshire and Peterborough Minerals and Waste Local Plan (July 2021) states that the Waste Planning Authorities will seek to



achieve 'net self-sufficiency' in relation to the management of waste arising from the plan area. However, this policy does not preclude the importation of waste from other Local Authorities or, importantly, place a ceiling on capacity to be provided - rather, it simply states that the plan will make positive provision for the equivalent of Cambridgeshire and Peterborough's own waste arisings – which it does.

- 3.2.14 However, this positive provision assumes that the PGEL project will be delivered, which is looking increasingly unlikely given that the site has been undeveloped for over 13 years (the site was granted planning consent in 2009) and is currently on the market. Furthermore, the Applicant considers it unlikely that the PGEL facility will be developed because the facility would use Advanced Combustion Technology and the UK funding market is now reluctant to fund this type of technology.
- 3.2.15 Assuming that Peterborough is not developed, Policy 3 of the MWLP indicates that there would be a local shortfall of ~80,000tpa by 2036 - this shortfall has been calculated using 575,000tpa as the capacity for PGEL. However, the consented capacity of the Peterborough facility was originally 650,000 tonnes per annum, which was then revised down to 595,000tpa as part of a subsequent amendment (reference: 18/01259/DISCHG) in July 2018. As such, not building this facility would in fact result in a loss of a further ~20,000 tonnes per annum of capacity -increasing the shortfall to 100,000tpa – a gap that the Proposed Development would close.
- 3.2.16 The Applicant recognises that the Proposed Development would deliver more than the identified Cambridgeshire and Peterborough ~100,000tpa capacity gap. However, Policy 3 also recognises that the capacity figures presented in Policy 3 **“are not ceilings for recycling, treatment or recovery of waste. As such, proposals will, in principle (and provided they are in accordance with Policy 4: Providing for Waste Management), be supported if any of the following scenarios apply: (a) it would assist in closing a gap identified in the table, provided such a gap has not already been demonstrably closed; or (b) it would assist in closing a new gap identified in the future, with such identification to be set out in the annual monitoring of the Plan; or (c) it moves waste capacity already identified in the above table up the waste hierarchy.[emphasis added]”**
- 3.2.17 Given that the Proposed Development would result in the recovery of heat and power from up to 625,000 tonnes per annum of residual waste that would otherwise be sent to landfill, it is considered that the provisions of Policy 3 are fully met.

The waste hierarchy

- 3.2.18 The Applicant fully supports the reduction of waste, re use of waste and recycling of waste and it must be stressed that the facility will not prevent recycling.
- 3.2.19 It is considered that the Proposed Development will fully deliver implementation of the waste hierarchy – a cornerstone of England's waste management policy and legislative framework - and divert waste from continued management at the



bottom of the waste hierarchy (i.e., landfill) up to having value (in the form of electricity recovered from it).

- 3.2.20 The Proposed Development is designed to accept residual waste, from codes 19 and 20. These are wastes that remain after source separation of recyclables or processing to recover any such viable recyclable material. At the Applicant's other EfW facilities the use of waste codes 19 and 20 prevents the delivery of source segregated or pre-sorted recyclates. The target feedstock is residual waste that is currently being landfilled. As such the facility will move the waste up the waste hierarchy from disposal to recovery.
- 3.2.21 Additionally, (and importantly), the **WFAA (Volume 7.3) [APP-094]** also considers the need for the Proposed Development in the context of how much residual waste will require management *in the future*. In other words, the achievement of national targets for the recycling and reuse of waste have already been taken into account when considering how much residual waste is likely to require management in the future.
- 3.2.22 Furthermore, even if it was considered that there were elements of the existing residual waste stream that *could* be recycled or re-used, without full analysis of that waste which is currently sent to landfill, it is not known what fractions/ % of the residual waste stream *could* potentially be moved further up the hierarchy. The **WFAA (Volume 7.3) [APP-094]** has taken a reasonable approach to assessing potential fuel levels by reviewing quantities of residual waste that are currently sent to landfill and drawing conclusions around the availability of that material to be diverted to the Proposed Development and result in that material being lifted up the waste management hierarchy.

3.3 Borough Council of Kings Lynn and West Norfolk (BKLWN)

Overview of representation

- 3.3.1 In respect of the waste need issue, the concern identified by BKLWN relates to whether there is sufficient waste to supply the Proposed Development with the fuel it will require.
- 3.3.2 Specifically, the response **[RR-001]** states:
- “If I was considering an Energy from waste site, I would consider firstly is their [sic] sufficient waste to feed the plant, located close to the proposed site. Secondly is their [sic] sufficient demand to use the Energy being generated. On the second point is their [sic] enough demand locally for the energy generated either steam or power. This area has a limited demand for the steam to be used in local factories and the power generated will be fed into the National Grid and be used anywhere the need arises. Therefore, there is no real reason why the plant needs to be built here, build it where the demand for steam is high. Finally, I think we should be looking at methods that encourage solutions that reduce the production of waste and*



encourage the use of renewables and therefore reduce the need for such a plant to be built.”

Applicant response

- 3.3.3 The **WFAA (Volume 7.3) [APP-094]** has assessed both the local requirement for the EfW CHP Facility as well as the national need. This has concluded that there is insufficient residual waste management capacity available to ensure that the UK’s non-recyclable waste can be managed as far up the waste hierarchy as possible (i.e., diverted from landfill) and in a manner which complies with the proximity principle (i.e., treating waste as close as possible to its point of arising). This latter point is especially relevant for the significant quantities of residual waste that are still exported from England for management via EfW in mainland Europe.

3.4 Wisbech Town Council

Overview of representation

- 3.4.1 There are several areas of concern identified by Wisbech Town Council **[RR-010]** in respect of fuel availability / waste need issues. Due to the number of concerns, these have been presented in Table 3.1 below, along with a response to each point raised.



Table 3.1 Summary of representations from Wisbech Town Council and the Applicant's response

Summary of representation	Applicant response
<p>There is no demonstrable need for the Proposed Development in the study area.</p>	<p>The need for the Proposed Development, and how it meets the requirements of NPS EN-3, is set out in the Planning Statement (Volume 7.1) [APP-091]. The WFAA (Volume 7.3) [APP-094] has assessed both the local requirement for the Proposed Development as well as the national need. This has concluded that there is insufficient residual waste management capacity available to ensure that non-recyclable waste can be managed as far up the waste hierarchy as possible (i.e., diverted from landfill) and in a manner which complies with the proximity principle (i.e., treating waste as close as possible to its point of arising). Whilst this latter point is especially relevant for the significant quantities of residual waste that are presently exported from England for management via EfW in mainland Europe, it is also relevant in terms of the waste that is presently exported from the East of England region for final disposal at other locations in the UK.</p>
<p>The over-provision of recovery capacity will detract from recycling.</p>	<p>In terms of the potential for the proposals to prejudice or detract from future recycling efforts, the focus of the WFAA (Volume 7.3) [APP-094] is on the availability of residual waste i.e., that part of the waste stream that is left over after reuse, recycling and other forms of recovery have taken place. It is therefore implicit in the WFAA (Volume 7.3) [APP-094] that the fraction of the household and commercial waste stream that is 'residual' is not able to be managed in any other way apart from incineration (with or without energy recovery) or landfill. Additionally, (and importantly), the WFAA (Volume 7.3) [APP-094] only considers the need for the Proposed Development in the context of how much residual waste will require management in the future. In other words, the achievement of national targets for the recycling</p>



Summary of representation

Applicant wishes to retain flexibility to accept waste from anywhere and do not wish the Proposed Development to be tied to a specific catchment area.

Applicant response

and reuse of waste have already been taken into account when considering how much residual waste is likely to require management in the future.

Noted and agreed. Waste markets in the UK are directly influenced by a range of factors including waste type, availability of management capacity and government fiscal, waste management and planning policies. Whilst waste should be managed as close as possible to its point of origin, the complex range of influencing factors inevitably means there is a flow of material across the country (and beyond). In this context, it is important to recognise that the Proposed Development is likely to draw in waste from a wider area, than say, simply Cambridgeshire, and that over the life of the Proposed Development, the area from which it will receive waste material is likely to change.

The local analysis of need has been based on the area that the Proposed Development is most likely to draw waste in from. This has been defined as an area approximately a 2-hour drive time from the Proposed Development. It is generally commercially viable to transport non-hazardous household, industrial and commercial waste from up to around 2 hours away, over 2 hours the haulage cost becomes increasingly expensive. However, due to the fluid nature of the UK waste market, there may also be instances where managing waste from further afield represents the best available solution.

The application of the 2-hour drive time in the WFAA (**Volume 7.3) [APP-094]** is a tool that has been used to indicate broadly where the Proposed Development is likely to draw waste in from and was never intended to act as a 'hard and fast' catchment area.



Summary of representation

Criticism that the methodology underpinning the catchment area has been manipulated to such an extent that the outputs are seriously distorted and cannot be relied upon. Most notably:

- Criticism that where the 2-hour drive time includes only a small part of a Waste Planning Authority (WPA), that the entire WPA has been included. Reference is made to the fact that waste data is published at a DC/BC level (LACW) and that this more granular analysis should be used.
- Why applying the former EE planning region, especially as some WPA's fall outside the 2-hour study area?

If its professional judgement that its not commercially viable to transport waste more than 2 hours, why do we have a national assessment?

Applicant response

The **WFAA (Volume 7.3) [APP-094]** is based on publicly available waste data from a range of sources including DEFRA, the Environment Agency, evidence bases from relevant Waste Local Plans and published research papers. The vast majority of these data are published at a Waste Planning Authority (WPA) level (with only Local authority Collected Waste being published at a more granular, District/ Borough Council level). This has significantly influenced the way in which data has been presented in the **WFAA (Volume 7.3) [APP-094]** i.e. if the 2 hour drive time tool used to define the Study Area draws in part of a WPA, then the whole WPA has been considered. However, it is not considered that this distorts the assessment. As noted above, the application of the 2-hour drive time is a tool has been used to **indicate broadly** where the Proposed Development is likely to draw waste in from and was never intended to act as a 'hard and fast' catchment area. As part of the Examination process, the **WFAA (Volume 7.3) [APP-094]** will be updated to reflect the latest data.

As noted above, the application of the 2-hour drive time in the **WFAA (Volume 7.3) [APP-094]** is a tool that has been used to indicate broadly where the Proposed Development is likely to draw waste in from and was never intended to act as a 'hard and fast' catchment area.

Professional judgement is that it *is generally commercially viable* to transport non-hazardous household, industrial and commercial waste from up to approximately 2 hours away from the Proposed Development. Distances over 2 hours travel time from the Proposed Development become increasingly expensive for those seeking to dispose of waste.



Summary of representation

Applicant response

The WFAA (**Volume 7.3**) [APP-094] is based on publicly available waste data from a range of sources including DEFRA, the Environment Agency, evidence bases from relevant Waste Local Plans and published research papers. The vast majority of these data are published at a Waste Planning Authority (WPA) level (with only Local authority Collected Waste being published at a more granular, District/ Borough Council level). This has significantly influenced the way in which data has been presented in the WFAA i.e. if the 2 hour drive time tool used to define the Study Area draws in part of a WPA, then the whole WPA has been considered. As part of the Examination process, the **WFAA (Volume 7.3) [APP-094]** will be updated to reflect the latest data.

In terms of why a national assessment has been completed, this is to ensure compliance with paragraph 2.5.7 of the National Policy Statement for Renewable Energy Infrastructure (EN-3), which states:

'The [Secretary of State] should be satisfied, with reference to the relevant waste strategies and plans, that the proposed waste combustion generating station 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.'

Applicant is clearly relying on waste outside the 2-hour travel time.

Waste markets in the UK are directly influenced by a range of factors including waste type, availability of management capacity and government fiscal, waste management and planning policies. Whilst waste should be managed as close as possible to its point of origin, the complex range of influencing factors



Summary of representation

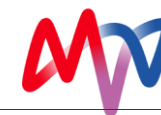
Applicant response

inevitably means there is a flow of material across the country (and beyond). In this context, it is important to recognise that the Proposed Development is likely to draw in waste from a wider area, than say, simply Cambridgeshire, and that over the life of the Proposed Development, the area from which it will receive waste material is likely to change.

The local analysis of need has been based on the area that the Proposed Development is most likely to draw waste in from. This has been defined as an area approximately a 2-hour drive time from the Proposed Development. It is generally commercially viable to transport non-hazardous household, industrial and commercial waste from up to around 2 hours away, over 2 hours the haulage cost becomes increasingly expensive. However, due to the fluid nature of the UK waste market, there may also be instances where managing waste from further afield represents the best available solution.

As noted above, the application of the 2-hour drive time used in the **WFAA (Volume 7.3) [APP-094]** is a tool has been used to indicate broadly where the Proposed Development is likely to draw waste in from and was never intended to act as a 'hard and fast' catchment area.

Furthermore, the data cited by the Town Council in its Relevant Representation relates to all Local Authority Collected Waste and is therefore over stated. The WFAA only considers the part of the household, industrial and commercial waste stream that would be available to the Proposed Development i.e. the residual portion - that is left over after recycling has taken place.



Summary of representation

Applicant response

Applicant is relying on data from 2019. Opening of Rookery South near Bedford in 2022 (545ktpa) not taken account of. This will affect the amount of residual waste available to Medworth.

No information included on the recycling rates in the WPA's with the study area.

Also, improvements in levels of recycling to meet the 65% target will reduce the amount of residual waste available.

As part of the Examination process, the **WFAA (Volume 7.3) [APP-094]** will be updated to reflect the latest data.

As part of the Examination process, the **WFAA (Volume 7.3) [APP-094]** will be updated to reflect the latest data. However, Rookery South has already been included as consented and operational capacity in the **WFAA (Volume 7.3) [APP-094]** - see Appendix C of the **WFAA (Volume 7.3) [APP-094]**.

The **WFAA (Volume 7.3) [APP-094]** is a robust analysis of future residual waste management needs at both a localised and national level. The assessment includes consideration of future needs taking into account existing WPA recycling levels and the achievement of a range of recycling targets. Specifically, Tables 5.3 and 5.4 in the **WFAA (Volume 7.3) [APP-094]** considers future recycling rates and Appendix D examines the collection arrangements of those authorities in the Study Area to determine the extent to which future recycling aspirations could be achieved.

In this regard, the **WFAA (Volume 7.3) [APP-094]** concludes that by 2030, it is predicted that even if the Government's ambitious combined recycling target of 65% for municipal and 'municipal like' commercial and industrial waste is realised, there would remain a minimum shortfall of ~2.8 million tonnes of residual HIC capacity in the UK (rising to over 6 million tonnes if the Government's recycling target is undershot by 5%). There is, however, significant doubt on the achievability of this recycling target. In 2021, municipal waste recycling stood at 43.8% - a level which falls well below the achievement of the 2020 target of 50%. To achieve the Government's new, more stringent target



Summary of representation

Applicant response

No account taken of the current contractual arrangements around existing residual waste that could be diverted to the Proposed Development.

of 65% by 2035, there needs to be an increase of over 21% in recycling in England over the next 14 years.

As noted previously, waste markets in the UK are directly influenced by a range of factors including waste type, availability of management capacity and government fiscal, waste management and planning policies. Whilst waste should be managed as close as possible to its point of origin, the complex range of influencing factors inevitably means there is a flow of material across the country (and beyond). Waste contracts are often short term and the subject of regular change. In this regard, over the life of the Proposed Development, the area from which it will receive waste material is likely to change.

The Applicant has sought to forecast future residual waste requirements through an assessment of the Waste Local Plan evidence base. It is noted that the Applicants state that they have paid particular attention to any anticipated shortfalls in future requirements but have excluded any over provision when calculating the total requirement.

Noted. From the assessment of Waste Local Plan evidence bases the following two WPA's identify no shortfall:

- Milton Keynes – 193,000 tonnes per annum surplus
- Suffolk – no surplus identified, simply that there is no shortfall.

As part of the Examination process, the **WFAA (Volume 7.3) [APP-094]** will be updated to reflect the latest publicly available data and an adjustment will be made for the very small identified surplus noted above.

There is no reason to think that the PGEL facility will not come on stream.

The PGEL development has been included in the WFAA at a capacity of 650ktpa – see Appendix C of the WFAA (**Volume 7.3) [APP-094]**. Any facility which has planning and could take the residual waste which the facility needs have been included in the study, none have been discounted as capacity. The Applicant



Summary of representation

Applicant response

Consented capacity at Rivenhall (Essex) of 595ktpa should be taken into consideration.

considers it unlikely that the PGEL facility will be developed because:

- It was approved in 2009 and has not been built yet.
- The facility uses Advanced Combustion Technology, the UK funding market is reluctant to fund this type of technology.

For both the local and national analysis, the **WFAA (Volume 7.3) [APP-094]** has sought to consider the extent to which there is a need for additional residual waste management capacity by reviewing operational capacity; capacity under construction; consented capacity (but not built); and capacity in the planning system. The purpose of this review was to validate the findings of two key studies that the WFAA relies on.

Appendix C sets out all the additional EfW capacity considered in the **WFAA (Volume 7.3) [APP-094]** and is considered a robust analysis of all existing and emerging EfW capacity in England.

As part of the Examination process, the **WFAA (Volume 7.3) [APP-094]** will be updated to reflect the latest publicly available data. However, Rivenhall (Essex) has already been included as consented and operational capacity in the **WFAA (Volume 7.3) [APP-094]** - see Appendix C of the **WFAA (Volume 7.3) [APP-094]**.

In Hertfordshire, all of the LACW is managed out of county under contracts which run until 2039. The Draft Waste Local Plan Review (January 2021) referred to in the WFAA was withdrawn in December 2021. The Hertfordshire Minerals and Waste Local Plan 2040 Draft Plan (July 2022) includes a surplus of 0.001Mt

Noted. As part of the Examination process, the **WFAA (Volume 7.3) [APP-094]** will be updated to reflect the latest publicly available data.



Summary of representation

Applicant response

(1,000 tpa) of treatment and energy recovery by 2035 and a shortfall of capacity of only 0.021Mt (21,000 tpa) by 2040.

Norfolk MWLP – The Norfolk Minerals and Waste Local Plan Publication document (May 2022) confirms that sufficient capacity already exists to accommodate the forecast growth in waste arisings over the Plan period to 2038. Therefore, it is not considered necessary to allocate any specific sites for waste management facilities in the NM&WLP. Publication Draft 2022 – update document to reflect this position.

Noted. As part of the Examination process, the **WFAA (Volume 7.3) [APP-094]** will be updated to reflect the latest publicly available data.

The WFAA relies on waste forecast data from the Thurrock Waste Arising and Capacity Studies (2009 and 2010) and is therefore out of date and should not be relied upon. The WFAA does however acknowledge the consent for the Tilbury Green Power plant which was recently varied by the Secretary of State (August 2022) to increase the electrical export capacity of the development from 80MW to 88 MW. This includes an increase in the electrical capacity of the energy from waste (EfW) facility (Phase 2) to 45MW. Although Phase 2 (350,000 tpa of EfW capacity) has yet to be built, there is no reason to assume it will not be implemented given the very recent variation to the consent.

Noted. As part of the Examination process, the **WFAA (Volume 7.3) [APP-094]** will be updated to reflect the latest publicly available data.

The Tilbury Green Power facility has already been included as consented and operational capacity in the **WFAA (Volume 7.3) [APP-094]** – see Appendix C of the WFAA.

No up-to-date analysis of the emerging Leicester Local Plan.

The Leicestershire Minerals and Waste Local Plan up to 2031 was adopted in 2019 and is not an emerging plan as stated in the WFAA. It confirms at paragraph 4.11 that sufficient capacity has already been permitted to handle the waste requiring management. This includes the 350,000tpa Newhurst Energy

As part of the Examination process, the **WFAA (Volume 7.3) [APP-094]** will be updated to reflect the latest publicly available data.

Table 4.6 (page 48) of the **WFAA (Volume 7.3) [APP-094]** notes that *“In the emerging City of Leicester Local Plan 2020-2036 (Page 196), it is noted that there is no up to date analysis of future*



Summary of representation	Applicant response
<p>Recovery Facility near Shepshed being developed by Biffa, Covanta and EQT, which is currently in its construction phase and due for completion in 2023. The shortfall identified in the WFAA would therefore not exist.</p>	<p><i>waste management requirements set out in this Plan. Instead, the Plan notes that the City Council will continue to meet the existing requirements as defined by the adopted Waste Development Framework (WDF) until a replacement Waste Plan can be adopted.</i>” In short, there is no detailed analysis of the emerging Leicester Local Plan as there is no relevant waste need analysis within it.</p> <p>Reference to the Leicestershire Minerals and Waste Local Plan up to 2031 being an Emerging Plan is an erroneous heading reference in the WFAA (Volume 7.3) [APP-094]. However, in the same part of the document (Table 4.6, page 48) it is acknowledged that the plan was adopted in 2019. In terms of the Newhurst ERF, the capacity that this facility offers is recognised and included in Appendix C of the WFAA (Volume 7.3) [APP-094].</p>
<p>The Northamptonshire Minerals and Waste Monitoring Report 2019 (March 2021) is not referred to in the WFAA, rather it relies on data from 2012. Table 4 of the aforementioned report confirms that there was a surplus in capacity of 0.043Mt of treatment and other forms of recovery.</p>	<p>Noted. As part of the Examination process, the WFAA (Volume 7.3) [APP-094] will be updated to reflect the latest publicly available data.</p>
<p>The WFAA relies on data from the emerging Rutland Local Plan 2018-2036 which was withdrawn in September 2021. The Local Needs Assessment (September 2018) confirms that the existing contract for municipal waste treatment reduces the future advanced treatment requirements by 8,500tpa, leaving around 20,000tpa.</p>	<p>Noted. As part of the Examination process, the WFAA (Volume 7.3) [APP-094] will be updated to reflect the latest publicly available data.</p>
<p>Paragraph 2.577 of the NPS for Renewable Energy Infrastructure (EN-3) and 2.18.7 of the emerging draft NPS)</p>	<p>The EfW CHP Facility treatment process creates two principal types of waste; Incinerator Bottom Ash (IBA) and Air Pollution</p>



Summary of representation

makes it clear that the assessment should include the production and disposal of residues as part of the ES. Any proposals for recovery of ash and mitigation measures should be described. Paragraph 2.5.78 and 2.18.8 of the emerging draft states that applicants should set out the consideration that they have given to the existence of accessible capacity in waste management sites for dealing with residues for the planned life of the power station. Fundamentally the assumption that the current proportion of residual waste that is currently landfilled will continue to be so until 2066 is not credible. This would be contrary to policy trends (which purportedly have been taken into account) requiring waste to be managed in accordance with the waste hierarchy and only landfilled when all other options have been ruled out. If the Applicant is assuming a declining proportion of waste is landfilled to 2066, these assumptions need to be clearly set out and justified.

Further justification is required for the landfill baseline. There are other baseline scenarios that could be considered such as alternative thermal treatment technologies.

Applicant response

Control residues (APCr). **ES Chapter 3 Description of the Proposed Development (Vol 6.2) [APP-030]** describes the production and management of the IBA and APCr at the EfW CHP Facility. The IBA and APCr will be exported off site to suitable licenced facilities for either further recycling, in respect of IBA, and landfill in respect of APCr (although the Applicant continues to review the market to investigate commercial opportunities to recycle or recover this waste).

The Applicant will provide further information on the capacity of IBA and APCr waste management facilities at Deadline 2.

Defra's Guidance on applying the waste hierarchy (Guidance on Applying the Waste Hierarchy, June 2011) notes in section 1 (page 3) that 'other recovery' comprises: anaerobic digestion, incineration with energy recovery, gasification and pyrolysis which produce energy (fuels, heat and power) and materials from waste; some backfilling. However, the document also goes on to outline in section 2.2 that for residual 'black bag' (the waste stream which is the focus of the **WFAA (Volume 7.3) [APP-094]**), 'recovery' waste management options comprise:

- Solid recovered fuel derived from mechanical heat treatment (MHT) or mechanical biological treatment (MBT), where it replaces coal;
- Energy Recovery, all technologies (Heat Only);



Summary of representation

Applicant response

- Energy Recovery, all technologies (CHP);
- Energy Recovery, all technologies (Electricity Only); or
- MBT or MHT outputs used as fuel (but do not replace coal).

When considering existing recovery capacity within the study area and within England, it can be confirmed that the **WFAA (Volume 7.3) [APP-094]** has included at all appropriate forms of recovery capacity. Appendix C of the **WFAA (Volume 7.3) [APP-094]** considers all alternative EfW technologies (i.e., gasification; mass burn incineration; fluidized bed etc).

However, with respect to MBT and MHT, these 'recovery technologies have been excluded from the **WFAA (Volume 7.3) [APP-094]** because such capacity would not represent a direct replacement for the Proposed Development. This is because the 'fuel' generated by such facilities still requires final 'treatment' at a facility such as that proposed at Medworth.



4. Other relevant representations

4.1 Non-statutory organisations

Council for the Protection of Rural England (CPRE)

Overview of representation

- 4.1.1 The key area of concern identified by CPRE **[RR-032]** in respect of fuel availability / waste need issues relates to the fact that the adopted Cambridgeshire and Peterborough Minerals and Waste Local Plan makes no reference to the need for a major waste incineration facility in the county and that the application for the Proposed Development must be considered in this context – in other words, the proposals must comply with the provisions of the adopted Minerals and Waste Local Plan. Reference is made to the provisions of Policy 3 of this plan (*Waste Management Needs*) and concern that the Study Area identified in the **WFAA (Volume 7.3) [APP-094]** confirms that the proposals are “*totally dependent upon the import of waste for incineration from many other local authorities external to Cambridgeshire and Peterborough in order to make its project financially viable.....This will clearly put the achievement of Policy 3 at risk and it is not consistent with government guidance which is intended to reduce waste movements and not encourage waste swapping over long distances*”.
- 4.1.2 The CPRE representation also states that there is no clear evidence that any of the authorities in the study area have committed to using the Proposed Development if it were permitted.

Applicant response

- 4.1.3 In terms of compliance with Policy 3 of the adopted Minerals and Waste Local Plan – see section 3.2 of this Technical Note, which addresses a similar point raised by CCC and FDC.
- 4.1.4 In respect of CPRE’s concerns about the adopted study area for the WFAA, in line with the existing National Policy Statement for Renewable Energy Infrastructure (EN-3) and the emerging updated version of this, the **WFAA (Volume 7.3) [APP-094]** considers the availability of waste in the context of local and national need.
- 4.1.5 The WFAA’s local analysis of need has been based on the area that the Proposed Development is most likely to draw waste in from. This has been defined as an area approximately a 2-hour drive time from the Proposed Development. It is generally commercially viable to transport non-hazardous household, industrial and commercial waste from up to around 2 hours away, over 2 hours the haulage cost becomes increasingly expensive. However, the application of the 2-hour drive time in the **WFAA (Volume 7.3) [APP-094]** is a tool has been used to indicate broadly



where the Proposed Development is likely to draw waste in from and was never intended to act as a 'hard and fast' catchment area.

4.1.6 Thus, the Study Area for the local analysis captures the Waste Planning Authorities that sit within the East of England area plus Lincolnshire, Leicestershire, Northamptonshire and Rutland.

4.1.7 The **WFAA (Volume 7.3) [APP-094]** excludes Coventry, NE Lincolnshire, N Lincolnshire, Nottingham City, Nottinghamshire, and Warwickshire – authorities that were included in the draft PEIR stage **WFAA (Volume 7.3) [APP-094]** - and authorities that are referenced in the CPRE's representations as being included.

4.1.8 Regarding the apparent lack of commitment by authorities within the study area to use the Proposed Development. Waste management contracts are commercially sensitive and the subject of ongoing change. As such, until such time as there is some certainty around the Proposed Development, it is unlikely that there would be any commercial commitments expressed to use the Proposed Development. Notwithstanding this, the **WFAA (Volume 7.3) [APP-094]** has concluded that there is sufficient residual waste generated both locally and nationally and insufficient, corresponding waste management capacity to manage this waste i.e., there is a clear need for the Proposed Development.

Kings Lynn Without Incineration Network (KLWIN)

Overview of representation

4.1.9 The concerns of the **KLWIN [RR-044]** in respect of fuel availability / waste need issues are centred around the potential for the Proposed Development to contribute to excessive combustion capacity in the UK. The specific points that are raised are:

- The Proposed Development would result in the burning of materials that would otherwise be recycled.
- HMG has published data relating to the ease / difficulty of recycling specific waste fractions.
- The Proposed Development would move the UK further away from achieving the principles of a circular economy.

Applicant response

4.1.10 As already highlighted in this Technical Note, the **WFAA (Volume 7.3) [APP-094]** which supports the need for the Proposed Development is focussed entirely on the availability of residual waste, which is presently either sent to landfill or exported from the UK for final disposal i.e., that part of the waste stream that is left over after reuse, recycling and other forms of recovery have taken place.

4.1.11 It is therefore implicit in the **WFAA (Volume 7.3) [APP-094]** that the fraction of the household and commercial waste stream that is 'residual' is not able to be managed



in any other way apart from incineration (with or without energy recovery) or landfill. Additionally, (and importantly), the **WFAA (Volume 7.3) [APP-094]** only considers the need for the Proposed Development in the context of how much residual waste will require management in the future. In other words, the achievement of national targets for the recycling and reuse of waste have already been taken into account when considering how much residual waste is likely to require management in the future.

4.1.12 With this in mind, it is considered that the Proposed Development would not result in the burning of materials that would otherwise be recycled and therefore, it would not contribute to moving the UK away from achieving the principles of a circular economy. Indeed, by facilitating the ability of the UK to manage its residual waste domestically (rather than exportation to mainland Europe and beyond), the Proposed Development would result in the achievement of a more sustainable approach to managing the UK's residual waste.

Peterborough, Fenlands and King's Lynn Community Branch (LE/00021) of Unite the Union

Overview of representation

4.1.13 In summary, this Interested Party **[RR-053]** objects to a significant proportion of the country's waste being processed on their doorstep.

Applicant response

4.1.14 From a fuel availability assessment perspective, the **WFAA (Volume 7.3) [APP-094]** has assessed both a local requirement for the EfW CHP Facility as well as the national need. This has concluded that there is insufficient residual waste management capacity available to ensure that non-recyclable waste can be managed as far up the waste hierarchy as possible (i.e., diverted from landfill) and in a manner which complies with the proximity principle (i.e., treating waste as close as possible to its point of arising). This latter point is especially relevant for the significant quantities of residual waste that are exported from England for management via EfW in mainland Europe.

UK Without Incineration Network (UKWIN)

Overview of representation

4.1.15 There are 2 areas of concern identified by UKWIN **[RR-055]** in respect of fuel availability / waste need issues. These are:

- **No need for the development:** *“A need for the proposed capacity has not been demonstrated through the Waste Fuel Availability Assessment. While UKWIN is pleased to see the Applicant acknowledging the relevance of draft NPS EN-3*



paras 2.10.4 and 2.10.5, our position is that the proposal goes against these emerging policies. The proposed capacity is not in line with Defra's policy position on the role of energy from waste (EfW) in treating municipal waste and would result in overcapacity of EfW waste treatment."

- **Proposals would prejudice future recycling:** *"The proposal also goes against other relevant policies, statements, goals and targets that promote the top tiers of the waste hierarchy over EfW incineration and that seek to avoid incineration overcapacity. UKWIN intends to cite concerns about how incineration competes with recycling, including Defra research and comments from the Climate Change Committee."*

Applicant response

- 4.1.16 In respect of the need issue, the **WFAA (Volume 7.3) [APP-094]** has assessed both the local requirement for the EfW CHP Facility as well as the national need. This has concluded that there is insufficient residual waste management capacity available to ensure that our non-recyclable waste can be managed as far up the waste hierarchy as possible (i.e., diverted from landfill) and in a manner which complies with the proximity principle (i.e., treating waste as close as possible to its point of arising). This latter point is especially relevant for the significant quantities of residual waste that are still exported from England for management via EfW in mainland Europe.
- 4.1.17 In terms of the potential for the proposals to prejudice or detract from future recycling efforts, the focus of the **WFAA (Volume 7.3) [APP-094]** is on the availability of residual waste i.e., that part of the waste stream that is left over after reuse, recycling and other forms of recovery have taken place. It is therefore implicit in the WFAA that the fraction of the household and commercial waste stream that is 'residual' is not able to be managed in any other way apart from incineration (with or without energy recovery) or landfill. Additionally, (and importantly), the **WFAA (Volume 7.3) [APP-094]** only considers the need for the Proposed Development in the context of how much residual waste will require management *in the future*. In other words, the achievement of national targets for the recycling and reuse of waste have already been taken into account when considering how much residual waste is likely to require management in the future.

4.2 Parish/ Town Councils

Snettisham Parish Council

Overview of representation

- 4.2.1 This Interested Party **[RR-006]** states that *"the need for the facility is not established as this area deals with its waste effectively, importing waste from other areas is unacceptable."*



Applicant response

4.2.2 However, as noted previously, the **WFAA (Volume 7.3) [APP-094]** has assessed both the local requirement for the EfW CHP Facility as well as the national need. This has concluded that there is insufficient residual waste management capacity available to ensure that our non-recyclable waste can be managed as far up the waste hierarchy as possible (i.e., diverted from landfill) and in a manner which complies with the proximity principle (i.e., treating waste as close as possible to its point of arising). This latter point is especially relevant for the significant quantities of residual waste that are exported from England for management via EfW in mainland Europe.

South Wootton Parish Council

Overview of representation

4.2.3 This Interested Party **[RR-007]** states that *“There is a general agreement that the amount of waste going to landfill needs to be reduced but less costly, non-hazardous alternatives should be considered such as Mechanical Biological Treatment and Anaerobic Digestion Plants. These can be built at a fraction of the cost of an Incinerator Plant, especially in the case of the Wisbech Plant which would be twice the size of the rejected Kings Lynn Plant. We believe that the best practice for waste disposal is via a combination of methods, i.e., by reducing waste in the first instance, reusing and recycling where possible and composting appropriate material using non-hazardous systems as mentioned above. There is no place for incineration.”*

Applicant response

4.2.4 In response to this representation, there are 2 key points to note:

- Not all recovery treatments represent a final form of disposal. MBT produces a solid recovered fuel (SRF), which must then go on to final management at an energy recovery facility such as the Proposed Development. Furthermore, as outlined in paragraph 3.2.5 of this note, according to extant Defra guidance on applying the waste hierarchy (*Guidance on Applying the Waste Hierarchy*, June 2011) anaerobic digestion does not represent a recovery waste management option for residual ‘black bag’ - the waste stream that is the focus of the **WFAA (Volume 7.3) [APP-094]**.
- As noted earlier in this note, the focus of the **WFAA (Volume 7.3) [APP-094]** is solely on the availability of residual waste i.e., that part of the waste stream that is left over after reuse, recycling and other forms of recovery have taken place. It is therefore implicit in the **WFAA (Volume 7.3) [APP-094]** that the fraction of the household and commercial waste stream that is 'residual' is not able to be managed in any other way apart from incineration (with or without energy recovery) or landfill. Additionally, (and importantly), the **WFAA (Volume 7.3) [APP-094]** only considers the need for the Proposed Development in the context of how much residual waste will require management in the future. In other



words, the achievement of national targets for the recycling and reuse of waste have already been taken into account when considering how much residual waste is likely to require management in the future.

4.3 Local businesses

Taylor's Reclaims Ltd (Taylors Reclaims Ltd)

Overview of representation

- 4.3.1 This Interested Party [RR-051] states: *“Understand the household waste could be brought in from as far as 2 hours away which is ridiculous to suggest when we are 25 miles away from the nearest major road or city.”*

Applicant response

- 4.3.2 In line with the existing National Policy Statement for Renewable Energy Infrastructure (EN-3) and the emerging updated version of this, the **WFAA (Volume 7.3) [APP-094]** considers the availability of waste in the context of local and national need.
- 4.3.3 The **WFAA (Volume 7.3) [APP-094]** local analysis of need has been based on the area that the Proposed Development is most likely to draw waste in from. This has been defined as an area approximately a 2-hour drive time from the Proposed Development. It is generally commercially viable to transport non-hazardous household, industrial and commercial waste from up to around 2 hours away, over 2 hours the haulage cost becomes increasingly expensive.
- 4.3.4 Thus, the Study Area for the local analysis captures the Waste Planning Authorities that sit within the East of England area plus Lincolnshire, Leicestershire, Northamptonshire and Rutland.
- 4.3.5 The **WFAA (Volume 7.3) [APP-094]** excludes Coventry, NE Lincolnshire, N Lincolnshire, Nottingham City, Nottinghamshire, and Warwickshire – authorities that were included in the draft PEIR stage **WFAA (Volume 7.3) [APP-094]** - and authorities that are referenced in the CPRE’s representations as being included.

Hutchinson’s

Overview of representation

- 4.3.6 This Interested Party [RR-359] states that current UK government policy is to encourage recycling and re-use of materials over and above incineration and landfill.

Applicant response



4.3.7 This statement is wholly agreed with. However, the focus of the **WFAA (Volume 7.3) [APP-094]** is on the availability of residual waste i.e., that part of the waste stream that is left over **after** reuse, recycling and other forms of recovery have taken place. It is therefore implicit in the **WFAA (Volume 7.3) [APP-094]** that the fraction of the household and commercial waste stream that is 'residual' is not able to be managed in any other way apart from incineration (with or without energy recovery) or landfill. To this end, the **WFAA (Volume 7.3) [APP-094]** has not only demonstrated that there is sufficient fuel for the Proposed Development but also that this is material that would not be diverted from being managed further up the hierarchy (either by recycling or reuse).

4.4 Other Interested Parties

4.4.1 Table 4.1 below summarises the responses received from members of the public (including Councillors) and provides the Applicant's response.



Table 4.1 Summary of representation from other Interested Parties and the Applicant's response

Reference	Consultee	Summary of representation	Applicant response
RR-271	Chris Garner	We are as a nation reducing, reusing, and recycling more and more. Incinerating is right at the bottom of the waste hierarchy along with dumping to landfills.	The WFAA (Volume 7.3) [APP-094] considers the availability of only those waste streams that would be suitable for treatment at the Proposed Development, and which is currently disposed of by landfill or export. This comprises household, industrial and commercial (HIC) waste predominantly from the European Waste Classification (EWC) chapter 19 (that is waste from waste management facilities) and chapter 20 (that is household waste and similar commercial, industrial and institutional wastes).
RR-63	Alan Wheeldon	MVV have overestimated how much waste would be available to burn in the coming years as the new Environment act (Nov 2021) has been created to boost recycling to at least 65% and to reduce landfill burnable waste to only 10% of what it is now. UKWin has estimated that by 2030 there will be a deficit of 9 million tonnes due to overcapacity of incinerators. In addition, just 28 miles away in Boston, plans have been submitted to build a 1 million tonne capacity incinerator which will take much of the waste that MVV is relying on to fulfil its own requirements. Being under capacity means that this incinerator will not be able to fulfil its pledge to generate 50Mw of electricity which takes it below the amount required for it to be a Nationally Significant Infrastructure Project.	WFAA (Volume 7.3) [APP-094] includes considerations around the availability of fuel should higher (65%) recycling targets be achieved. In this regard, the WFAA (Volume 7.3) [APP-094] concludes that by 2030, it is predicted that even if the Government's ambitious combined recycling target of 65% for municipal and 'municipal like' commercial and industrial waste is realised, there would remain a minimum shortfall of 2.8 million tonnes of residual HIC capacity in the UK (rising to over 6 million tonnes if the Government's recycling target is undershot by 5%).



Reference	Consultee	Summary of representation	Applicant response
RR-121	David Peter Bragg	Increase in recycling could reduce amount of incoming material which could then increase material from further afield to keep incinerator working.	WFAA (Volume 7.3) [APP-094] includes considerations around the availability of fuel should higher (65%) recycling targets be achieved. In this regard, the WFAA (Volume 7.3) [APP-094] concludes that by 2030, it is predicted that even if the Government's ambitious combined recycling target of 65% for municipal and 'municipal like' commercial and industrial waste is realised, there would remain a minimum shortfall of 2.8 million tonnes of residual HIC capacity in the UK (rising to over 6 million tonnes if the Government's recycling target is undershot by 5%).
RR-381	Alastair Kent	It will inhibit recycling by diverting materials that could otherwise be re-used.	The WFAA (Volume 7.3) [APP-094] considers the availability of only those waste streams that would be suitable for treatment at the Proposed Development, and which is currently disposed of by landfill or export. This comprises household, industrial and commercial (HIC) waste predominantly from the European Waste Classification (EWC) chapter 19 (that is waste from waste management facilities) and chapter 20 (that is household waste and similar commercial, industrial and institutional wastes).
RR-294	Charlotte Graham-Cameron	Nationally the UK already has an overcapacity to burn waste meaning yet more recyclable materials would be used as fuel. We should be recycling more and not polluting the air.	The WFAA (Volume 7.3) [APP-094] has assessed the local requirement for the Proposed Development as well as the national need. This has concluded that there is insufficient residual waste management capacity available to ensure that non-recyclable waste can be managed as far up the waste hierarchy as possible (i.e., diverted from landfill) and in a manner which complies with the proximity principle (i.e.,



Reference	Consultee	Summary of representation	Applicant response
			treating waste as close as possible to its point of arising). Whilst this latter point is especially relevant for the significant quantities of residual waste that are presently exported from England for management via EfW in mainland Europe, it is also relevant in terms of the waste that is presently exported from the East of England region for final disposal at other locations in the UK.
22-260	David Forster	This is a totally inappropriate facility for this area. Bringing refuse from the Midlands to be burnt in the middle of a town does not make sense.	The local analysis of need has been based on the area that the Proposed Development is most likely to draw waste in from. This has been defined as an area approximately a 2-hour drive time from the Proposed Development. It is generally commercially viable to transport non-hazardous household, industrial and commercial waste from up to around 2 hours away, over 2 hours the haulage cost becomes increasingly expensive. However, the application of the 2-hour drive time in the WFAA (Volume 7.3) [APP-094] is a tool has been used to indicate broadly where the Proposed Development is likely to draw waste in from and was never intended to act as a 'hard and fast' catchment area.
RR-245	Pamela Fenton	Better ways must be found to reduce waste for the future.	The WFAA (Volume 7.3) [APP-094] considers the availability of only those waste streams that would be suitable for treatment at the proposed Project, and which is currently disposed of by landfill or export. This comprises household, industrial and commercial (HIC) waste predominantly from the European Waste Classification (EWC) chapter 19 (that is waste from



Reference	Consultee	Summary of representation	Applicant response
			waste management facilities) and chapter 20 (that is household waste and similar commercial, industrial and institutional wastes).
RR-088	Michael Stephen Barratt	It is also not required.	The WFAA (Volume 7.3) [APP-094] has assessed the local requirement for the Proposed Development as well as the national need. This has concluded that there is insufficient residual waste management capacity available to ensure that non-recyclable waste can be managed as far up the waste hierarchy as possible (i.e., diverted from landfill) and in a manner which complies with the proximity principle (i.e., treating waste as close as possible to its point of arising). Whilst this latter point is especially relevant for the significant quantities of residual waste that are presently exported from England for management via EfW in mainland Europe, it is also relevant in terms of the waste that is presently exported from the East of England region for final disposal at other locations in the UK.
RR-172	Linda Clarke	Unnecessary	The WFAA (Volume 7.3) [APP-094] has assessed the local requirement for the Proposed Development as well as the national need. This has concluded that there is insufficient residual waste management capacity available to ensure that non-recyclable waste can be managed as far up the waste hierarchy as possible (i.e., diverted from landfill) and in a manner which complies with the proximity principle (i.e., treating waste as close as possible to its point of arising). Whilst this latter point is especially relevant for



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			the significant quantities of residual waste that are presently exported from England for management via EfW in mainland Europe, it is also relevant in terms of the waste that is presently exported from the East of England region for final disposal at other locations in the UK.
RR-241	Rosemary Elliott	Incineration is not an acceptable alternative to landfill. The effort should be put into putting pressure on companies to reduce non-recyclable products and packaging	Energy recovery sits above landfill in the Government's established waste management hierarchy. Furthermore, the WFAA (Volume 7.3) [APP-094] has only considered the availability of only those waste streams that would be suitable for treatment at the proposed Project, and which is currently disposed of by landfill or export. This comprises household, industrial and commercial (HIC) waste predominantly from the European Waste Classification (EWC) chapter 19 (that is waste from waste management facilities) and chapter 20 (that is household waste and similar commercial, industrial and institutional wastes).
RR-218	Owen Dobson	Why should Wisbech site an incinerator to burn waste from elsewhere?	The WFAA (Volume 7.3) [APP-094] has concluded that the Proposed Development could offer up to 625,600 tonnes per annum of much needed capacity that would contribute significantly to a local and national moving waste up the waste hierarchy and away from a reliance on disposal to landfill.
RR-649	Michelle Mary Elaine Wilson	At times when we are encouraged to minimise waste, this facility seeks to provide an outlet, via incineration, that negates the need for such environmental benefit.	The WFAA (Volume 7.3) [APP-094] considers the availability of only those waste streams that would be suitable for treatment at the proposed Project, and



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			which is currently disposed of by landfill or export. This comprises household, industrial and commercial (HIC) waste predominantly from the European Waste Classification (EWC) chapter 19 (that is waste from waste management facilities) and chapter 20 (that is household waste and similar commercial, industrial and institutional wastes).
RR-142	PJ Bryant	I object to the proposal on the following grounds It's siting within the UK is entirely inappropriate.	The WFAA (Volume 7.3) [APP-094] has assessed the local requirement for the Proposed Development as well as the national need. This has concluded that there is insufficient residual waste management capacity available to ensure that non-recyclable waste can be managed as far up the waste hierarchy as possible (i.e., diverted from landfill) and in a manner which complies with the proximity principle (i.e., treating waste as close as possible to its point of arising). Whilst this latter point is especially relevant for the significant quantities of residual waste that are presently exported from England for management via EfW in mainland Europe, it is also relevant in terms of the waste that is presently exported from the East of England region for final disposal at other locations in the UK.
RR-110	Councillor Chris Boden	I am the Leader of Fenland District Council. I object to the proposal on a number of grounds, principal among which are the following: 4. There is no local need for this proposed facility. If there is a wider need for it, it should be situated closer to its sources of input, thus minimising LGV total vehicle miles.	The WFAA (Volume 7.3) [APP-094] has assessed the local requirement for the Proposed Development as well as the national need. This has concluded that there is insufficient residual waste management capacity available to ensure that non-recyclable waste can be managed as far up the waste hierarchy as



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			possible (i.e., diverted from landfill) and in a manner which complies with the proximity principle (i.e., treating waste as close as possible to its point of arising). Whilst this latter point is especially relevant for the significant quantities of residual waste that are presently exported from England for management via EfW in mainland Europe, it is also relevant in terms of the waste that is presently exported from the East of England region for final disposal at other locations in the UK.
RR-477	Darrin Parish	We should not be burning waste we should be promoting recycling and encouraging manufacturers to use products which can be recycled.	The WFAA (Volume 7.3) [APP-094] considers the availability of only those waste streams that would be suitable for treatment at the proposed Project, and which is currently disposed of by landfill or export. This comprises household, industrial and commercial (HIC) waste predominantly from the European Waste Classification (EWC) chapter 19 (that is waste from waste management facilities) and chapter 20 (that is household waste and similar commercial, industrial and institutional wastes).
RR-085	Barbara Barker	Objections to Wisbech incinerator - 2) Thousands of tonnes of non-recyclable municipal and commercial and industrial waste will be brought to Wisbech each year.	The local analysis of need has been based on the area that the Proposed Development is most likely to draw waste in from. This has been defined as an area approximately a 2-hour drive time from the Proposed Development. It is generally commercially viable to transport non-hazardous household, industrial and commercial waste from up to around 2 hours away, over 2 hours the haulage cost becomes increasingly expensive. However, the application of the 2-hour



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			drive time in the WFAA (Volume 7.3) [APP-094] is a tool has been used to indicate broadly where the Proposed Development is likely to draw waste in from and was never intended to act as a 'hard and fast' catchment area.
RR-314	Eleanor Harris	I notice this proposal hasn't been suggested in the lovely Cotswolds, or Beautiful Sussex. Instead, it has been proposed to be built in a low wage community. No doubt the proposers aren't local to this area.	ES Chapter 2 Alternatives (Volume 6.2) [APP-029] sets out the site selection process and the reasons why the EfW CHP Facility Site is considered suitable.
47125	David Sharpe	I notice this proposal hasn't been suggested in the lovely Cotswolds, or Beautiful Sussex. Instead, it has been proposed to be built in a low wage community. No doubt the proposers aren't local to this area.	ES Chapter 2 Alternatives (Volume 6.2) [APP-029] sets out the site selection process and the reasons why the EfW CHP Facility Site is considered suitable.
RR-342	Andrew Houghton	My concerns for the proposed incinerator include: 3) Purpose - the focus should be on reducing waste - not looking at how to dispose of it.	The WFAA (Volume 7.3) [APP-094] considers the availability of only those waste streams that would be suitable for treatment at the proposed Project, and which is currently disposed of by landfill or export. This comprises household, industrial and commercial (HIC) waste predominantly from the European Waste Classification (EWC) chapter 19 (that is waste from waste management facilities) and chapter 20 (that is household waste and similar commercial, industrial and institutional wastes).
RR-220	Margaret Diane Donaldson	Why would there be the need for this incinerator as there are so many across the country and the	The WFAA (Volume 7.3) [APP-094] has assessed the local requirement for the Proposed Development as well as the national need. This has concluded that



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		government policy is for better recycling and less packaging.	there is insufficient residual waste management capacity available to ensure that non-recyclable waste can be managed as far up the waste hierarchy as possible (i.e., diverted from landfill) and in a manner which complies with the proximity principle (i.e., treating waste as close as possible to its point of arising). Whilst this latter point is especially relevant for the significant quantities of residual waste that are presently exported from England for management via EfW in mainland Europe, it is also relevant in terms of the waste that is presently exported from the East of England region for final disposal at other locations in the UK.
RR-493	Christopher John Pirie	This is a backward thinking way to deal with waste and environmental processing of waste.	The WFAA (Volume 7.3) [APP-094] has demonstrated that the Proposed Development would contribute to the diversion of significant quantities of residual waste that is currently sent to landfill. The treatment of this waste would be pushed up the waste management hierarchy in value both heat and power would be recovered directly from it.
RR-176	Wayne Clarke Cowling	What area will the waste be transported from for disposal at this plant?	Waste markets in the UK are directly influenced by a range of factors including waste type, availability of management capacity and government fiscal, waste management and planning policies. Whilst waste should be managed as close as possible to its point of origin, the complex range of influencing factors inevitably means there is a flow of material across the country (and beyond). In this context, it is important to recognise that the Proposed Development is likely to



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RR-630	Stephen Charles Wenn	Food and wood waste can and should be composted to replace peat usage.	<p>draw in waste from a wider area, than say, simply Cambridgeshire, and that over the life of the Proposed Development, the area from which it will receive waste material is likely to change.</p> <p>The local analysis of need has been based on the area that the Proposed Development is most likely to draw waste in from. This has been defined as an area approximately a 2-hour drive time from the Proposed Development. It is generally commercially viable to transport non-hazardous household, industrial and commercial waste from up to around 2 hours away, over 2 hours the haulage cost becomes increasingly expensive. However, the application of the 2-hour drive time in the WFAA (Volume 7.3) [APP-094] is a tool has been used to indicate broadly where the Proposed Development is likely to draw waste in from and was never intended to act as a 'hard and fast' catchment area.</p> <p>The WFAA (Volume 7.3) [APP-094] considers the availability of only those waste streams that would be suitable for treatment at the proposed Project, and which is currently disposed of by landfill or export. This comprises household, industrial and commercial (HIC) waste predominantly from the European Waste Classification (EWC) chapter 19 (that is waste from waste management facilities) and chapter 20 (that is household waste and similar commercial, industrial and institutional wastes).</p>



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		4 Recycling would be disincentivised due to councils being locked into contracts to provide sufficient waste	The WFAA (Volume 7.3) [APP-094] considers the availability of only those waste streams that would be suitable for treatment at the proposed Project, and which is currently disposed of by landfill or export. This comprises household, industrial and commercial (HIC) waste predominantly from the European Waste Classification (EWC) chapter 19 (that is waste from waste management facilities) and chapter 20 (that is household waste and similar commercial, industrial and institutional wastes).
RR-415	B Males	We do not need a MEGA incinerator we should be looking to recycle not encourage waste incineration.	The WFAA (Volume 7.3) [APP-094] considers the availability of only those waste streams that would be suitable for treatment at the proposed Project, and which is currently disposed of by landfill or export. This comprises household, industrial and commercial (HIC) waste predominantly from the European Waste Classification (EWC) chapter 19 (that is waste from waste management facilities) and chapter 20 (that is household waste and similar commercial, industrial and institutional wastes).
RR-363	Paula Ireland	The EU are cutting funding to energy from waste incinerators and want them closed, as the UK is no longer in the EU, they are free to apply to build, is this a reason MVV have chosen to build in the UK with waste to be eventually imported and Wisbech conveniently positioned?	The Proposed Development would not import waste from the EU for treatment. Currently, the UK exports processed waste to the EU and this facility would allow the UK to be more self-sufficient in terms of disposal capacity.



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RR-457	Richard Morrish	I oppose this incinerator and I oppose incineration as an environmentally acceptable and sustainable way to process waste. If this facility was built it would set back moving to the appropriate long-term solutions for waste management - which are: removing materials that are difficult to recycle from the waste stream (eg many types of plastic should be banned from packaging); composting putrescibles; separating and extracting recyclable materials from the waste stream and supporting recycling industries; Reduce, Reuse, Recycle! These processes have been shown to produce more jobs and greater economic benefit.	Noted. The WFAA (Volume 7.3) [APP-094] considers the availability of only those waste streams that would be suitable for treatment at the proposed Project, and which is currently disposed of by landfill or export. This comprises household, industrial and commercial (HIC) waste predominantly from the European Waste Classification (EWC) chapter 19 (that is waste from waste management facilities) and chapter 20 (that is household waste and similar commercial, industrial and institutional wastes).
RR-647	Christian Mark Wilson	Not environmentally friendly	The Non-Technical Summary [APP-027] of the Environmental Statement submitted with the DCO application provides a summary of the environmental impacts of the Proposed Development. The WFAA (Volume 7.3) [APP-094] has demonstrated that the Proposed Development would contribute to the diversion of significant quantities of residual waste that is currently sent to landfill. The treatment of this waste would be pushed up the waste management hierarchy in value both heat and power would be recovered directly from it.
RR-104	Helana Francise Betts	My main concerns are: 9. We are supposed to be moving toward renewables and away from fossil fuels, creating less waste, and reducing pollution. Our solution? Build a bloody great rubbish burning factory.	The Applicant refers to the Project Benefits Report [APP-095] and the assessment in ES Chapter 14: Climate Change (Volume 6.2) [APP-041] which set out the Applicant's position on this point.



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		Well done UK - I can see we are taking climate change seriously.	
RR-141	A J Bryant	I object to the proposal on the following grounds: Its siting within the UK is entirely inappropriate	ES Chapter 2 Alternatives (Volume 6.2) [APP-029] sets out the site selection process and the reasons why the EfW CHP Facility Site is considered suitable.
RR-369	Anthony Percy Johnson	I feel there are better ways of dealing with waste far more user friendly than this monstrosity...	The WFAA (Volume 7.3) [APP-094] has demonstrated that the Proposed Development would contribute to the diversion of significant quantities of residual waste that is currently sent to landfill. The treatment of this waste would be pushed up the waste management hierarchy in value both heat and power would be recovered directly from it.
RR-484	Brian Pawley	There is an oversupply of incinerators in the East of England. So this incinerator is NOT needed.	The WFAA (Volume 7.3) [APP-094] has assessed the local requirement for the Proposed Development as well as the national need. This has concluded that there is insufficient residual waste management capacity available to ensure that non-recyclable waste can be managed as far up the waste hierarchy as possible (i.e., diverted from landfill) and in a manner which complies with the proximity principle (i.e., treating waste as close as possible to its point of arising). Whilst this latter point is especially relevant for the significant quantities of residual waste that are presently exported from England for management via EfW in mainland Europe, it is also relevant in terms of the waste that is presently exported from the East of England region for final disposal at other locations in the UK.



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RR-120	The Brady family	The project will have a negative impact on recycling	The WFAA (Volume 7.3) [APP-094] considers the availability of only those waste streams that would be suitable for treatment at the proposed Project, and which is currently disposed of by landfill or export. This comprises household, industrial and commercial (HIC) waste predominantly from the European Waste Classification (EWC) chapter 19 (that is waste from waste management facilities) and chapter 20 (that is household waste and similar commercial, industrial and institutional wastes).
		Discourage sorting and reuse of waste materials into new products 'cradle to cradle' rather than this project 'cradle to grave' Money better used on other projects, solar, wind etc	The WFAA (Volume 7.3) [APP-094] considers the availability of only those waste streams that would be suitable for treatment at the proposed Project, and which is currently disposed of by landfill or export. This comprises household, industrial and commercial (HIC) waste predominantly from the European Waste Classification (EWC) chapter 19 (that is waste from waste management facilities) and chapter 20 (that is household waste and similar commercial, industrial and institutional wastes).
RR-287	Cliff Goodman	4) High proportion of waste will not be suitable for incineration and the general idea of burning waste will negate incentives for waste reduction	The WFAA (Volume 7.3) [APP-094] considers the availability of only those waste streams that would be suitable for treatment at the proposed Project, and which is currently disposed of by landfill or export. This comprises household, industrial and commercial (HIC) waste predominantly from the European Waste Classification (EWC) chapter 19 (that is waste from waste management facilities) and chapter 20 (that is



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			household waste and similar commercial, industrial and institutional wastes).
RR-442	Rose Merrilees	Incineration is outdated and flies in the face of the UK's ambition to become carbon neutral by 2050. It should be the last resort for waste which can be recycled or reused and in fact has the effect of reducing recycling.	The WFAA (Volume 7.3) [APP-094] considers the availability of only those waste streams that would be suitable for treatment at the proposed Project, and which is currently disposed of by landfill or export. This comprises household, industrial and commercial (HIC) waste predominantly from the European Waste Classification (EWC) chapter 19 (that is waste from waste management facilities) and chapter 20 (that is household waste and similar commercial, industrial and institutional wastes).
RR-486	Thomas Pearson	Waste should be recycled, not burnt. This does not discourage unnecessary wastage.	The WFAA (Volume 7.3) [APP-094] considers the availability of only those waste streams that would be suitable for treatment at the proposed Project, and which is currently disposed of by landfill or export. This comprises household, industrial and commercial (HIC) waste predominantly from the European Waste Classification (EWC) chapter 19 (that is waste from waste management facilities) and chapter 20 (that is household waste and similar commercial, industrial and institutional wastes).
RR-321	Henry Michael Head	and I am at a loss to know why this application has reached this stage when there is an oversupply of incinerators in the East of England.	The WFAA (Volume 7.3) [APP-094] has assessed the local requirement for the Proposed Development as well as the national need. This has concluded that there is insufficient residual waste management capacity available to ensure that non-recyclable waste can be managed as far up the waste hierarchy as



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			possible (i.e., diverted from landfill) and in a manner which complies with the proximity principle (i.e., treating waste as close as possible to its point of arising). Whilst this latter point is especially relevant for the significant quantities of residual waste that are presently exported from England for management via EfW in mainland Europe, it is also relevant in terms of the waste that is presently exported from the East of England region for final disposal at other locations in the UK.
RR-113	Peter Boulton	We're meant to be working towards Net Zero and a greener planet, not pumping tons of pollutants into the atmosphere. Push for more recycling.	The WFAA (Volume 7.3) [APP-094] considers the availability of only those waste streams that would be suitable for treatment at the proposed Project, and which is currently disposed of by landfill or export. This comprises household, industrial and commercial (HIC) waste predominantly from the European Waste Classification (EWC) chapter 19 (that is waste from waste management facilities) and chapter 20 (that is household waste and similar commercial, industrial and institutional wastes).
RR-204	Christopher Dallison	But, in these days of better waste separation/recycling/reuse are more incinerators really required?	The WFAA (Volume 7.3) [APP-094] considers the availability of only those waste streams that would be suitable for treatment at the proposed Project, and which is currently disposed of by landfill or export. This comprises household, industrial and commercial (HIC) waste predominantly from the European Waste Classification (EWC) chapter 19 (that is waste from waste management facilities) and chapter 20 (that is



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			household waste and similar commercial, industrial and institutional wastes).
RR-590	Andrew Taylor	The Wisbech incinerator will add to an existing over supply of incinerators in the East of England and is more than twice as large as a previously proposed incinerator, which was rejected.	The WFAA (Volume 7.3) [APP-094] has assessed the local requirement for the Proposed Development as well as the national need. This has concluded that there is insufficient residual waste management capacity available to ensure that non-recyclable waste can be managed as far up the waste hierarchy as possible (i.e., diverted from landfill) and in a manner which complies with the proximity principle (i.e., treating waste as close as possible to its point of arising). Whilst this latter point is especially relevant for the significant quantities of residual waste that are presently exported from England for management via EfW in mainland Europe, it is also relevant in terms of the waste that is presently exported from the East of England region for final disposal at other locations in the UK.
		More waste should be reused and recycled, thereby not adding to the Net Zero problem - incinerators are, of course, against net Zero and will make meeting the carbon reduction targets more difficult.	The WFAA (Volume 7.3) [APP-094] considers the availability of only those waste streams that would be suitable for treatment at the proposed Project, and which is currently disposed of by landfill or export. This comprises household, industrial and commercial (HIC) waste predominantly from the European Waste Classification (EWC) chapter 19 (that is waste from waste management facilities) and chapter 20 (that is household waste and similar commercial, industrial and institutional wastes).



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RR-232	Albert Edward Eaglen	Waste can, and should be , reused or prevented..	The WFAA (Volume 7.3) [APP-094] considers the availability of only those waste streams that would be suitable for treatment at the proposed Project, and which is currently disposed of by landfill or export. This comprises household, industrial and commercial (HIC) waste predominantly from the European Waste Classification (EWC) chapter 19 (that is waste from waste management facilities) and chapter 20 (that is household waste and similar commercial, industrial and institutional wastes).
RR-118	Mark Timothy Bradberry	There are now much more environmentally friendly ways of re-cycling waste	The WFAA (Volume 7.3) [APP-094] considers the availability of only those waste streams that would be suitable for treatment at the proposed Project, and which is currently disposed of by landfill or export. This comprises household, industrial and commercial (HIC) waste predominantly from the European Waste Classification (EWC) chapter 19 (that is waste from waste management facilities) and chapter 20 (that is household waste and similar commercial, industrial and institutional wastes).
RR-619	Kevin Waddington	Waste can and should be recycle;	The WFAA (Volume 7.3) [APP-094] considers the availability of only those waste streams that would be suitable for treatment at the proposed Project, and which is currently disposed of by landfill or export. This comprises household, industrial and commercial (HIC) waste predominantly from the European Waste Classification (EWC) chapter 19 (that is waste from waste management facilities) and chapter 20 (that is



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RR-440	Nicholas Anthony Meekins	This plant represents a massive over provision of waste requirements in the area. It could lead to councils missing recycling targets if they have to send recyclable waste to meet contracted tonnages. The proposals state that waste would only come from within a 2 hour HGV journey, the figures for the sources of waste appear to contradict this statement.	<p>household waste and similar commercial, industrial and institutional wastes).</p> <p>The WFAA (Volume 7.3) [APP-094] has assessed the local requirement for the Proposed Development as well as the national need. This has concluded that there is insufficient residual waste management capacity available to ensure that non-recyclable waste can be managed as far up the waste hierarchy as possible (i.e., diverted from landfill) and in a manner which complies with the proximity principle (i.e., treating waste as close as possible to its point of arising). Whilst this latter point is especially relevant for the significant quantities of residual waste that are presently exported from England for management via EfW in mainland Europe, it is also relevant in terms of the waste that is presently exported from the East of England region for final disposal at other locations in the UK.</p> <p>The WFAA (Volume 7.3) [APP-094] considers the availability of only those waste streams that would be suitable for treatment at the proposed Project, and which is currently disposed of by landfill or export. This comprises household, industrial and commercial (HIC) waste predominantly from the European Waste Classification (EWC) chapter 19 (that is waste from waste management facilities) and chapter 20 (that is household waste and similar commercial, industrial and institutional wastes).</p>



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RR-433	Debra Eve McGowan	<p>I believe that all waste should be reused. Glass should be used in place of plastic, and the old way of putting a deposit charge for a return of a drink bottle reintroduced. Metals, wood and paper, as well as food are all recyclable. The government should ban all unrecyclable Materials were ever possible and reinstalled paper bag instead a plastic. If we reduce our dependency on plastic we would not have half as much rubbish to burn.</p> <p>I cannot believe any incinerator which would be built would not become a dumping ground for all areas including London.</p>	<p>The WFAA (Volume 7.3) [APP-094] considers the availability of only those waste streams that would be suitable for treatment at the proposed Project, and which is currently disposed of by landfill or export. This comprises household, industrial and commercial (HIC) waste predominantly from the European Waste Classification (EWC) chapter 19 (that is waste from waste management facilities) and chapter 20 (that is household waste and similar commercial, industrial and institutional wastes).</p> <p>The WFAA (Volume 7.3) [APP-094] has assessed the local requirement for the Proposed Development as well as the national need. This has concluded that there is insufficient residual waste management capacity available to ensure that non-recyclable waste can be managed as far up the waste hierarchy as possible (i.e., diverted from landfill) and in a manner which complies with the proximity principle (i.e., treating waste as close as possible to its point of arising). Whilst this latter point is especially relevant for the significant quantities of residual waste that are presently exported from England for management via EfW in mainland Europe, it is also relevant in terms of the waste that is presently exported from the East of England region for final disposal at other locations in the UK.</p>
RR-255	The Fuller Family	To be commercially run, waste materials would need to be brought in from well outside the local area, which is inefficient and polluting in itself.	Waste markets in the UK are directly influenced by a range of factors including waste type, availability of management capacity and government fiscal, waste



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		<p>The burning of waste discourages better recycling practices</p>	<p>management and planning policies. Whilst waste should be managed as close as possible to its point of origin, the complex range of influencing factors inevitably means there is a flow of material across the country (and beyond). In this context, it is important to recognise that the Proposed Development is likely to draw in waste from a wider area, than say, simply Cambridgeshire, and that over the life of the Proposed Development, the area from which it will receive waste material is likely to change.</p> <p>The local analysis of need has been based on the area that the Proposed Development is most likely to draw waste in from. This has been defined as an area approximately a 2-hour drive time from the Proposed Development. It is generally commercially viable to transport non-hazardous household, industrial and commercial waste from up to around 2 hours away, over 2 hours the haulage cost becomes increasingly expensive. However, the application of the 2-hour drive time in the WFAA (Volume 7.3) [APP-094] is a tool has been used to indicate broadly where the Proposed Development is likely to draw waste in from and was never intended to act as a ‘hard and fast’ catchment area.</p> <p>The WFAA (Volume 7.3) [APP-094] considers the availability of only those waste streams that would be suitable for treatment at the proposed Project, and which is currently disposed of by landfill or export. This comprises household, industrial and commercial (HIC)</p>



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RR-424	Barbara Marshall	Emphasis needs to be placed on recycling, and developing technologies for reuse of more materials, not incineration.	waste predominantly from the European Waste Classification (EWC) chapter 19 (that is waste from waste management facilities) and chapter 20 (that is household waste and similar commercial, industrial and institutional wastes).
RR-424	Barbara Marshall	Emphasis needs to be placed on recycling, and developing technologies for reuse of more materials, not incineration.	The WFAA (Volume 7.3) [APP-094] considers the availability of only those waste streams that would be suitable for treatment at the proposed Project, and which is currently disposed of by landfill or export. This comprises household, industrial and commercial (HIC) waste predominantly from the European Waste Classification (EWC) chapter 19 (that is waste from waste management facilities) and chapter 20 (that is household waste and similar commercial, industrial and institutional wastes).
RR-338	Ruth Fenella Hopgood	Clarity is required as to whether it is actually feasible to provide sufficient suitable, non-recyclable material from the surrounding area to actually run an incinerator at the quoted level of input, as detailed in Stephen Barclay's submission. If not, this would be deemed a non-DCO development and would have to go through the 'normal' planning process with far more input from local, regional and statutory consultees.	The WFAA (Volume 7.3) [APP-094] has assessed the local requirement for the Proposed Development as well as the national need. This has concluded that there is insufficient residual waste management capacity available to ensure that non-recyclable waste can be managed as far up the waste hierarchy as possible (i.e., diverted from landfill) and in a manner which complies with the proximity principle (i.e., treating waste as close as possible to its point of arising). Whilst this latter point is especially relevant for the significant quantities of residual waste that are presently exported from England for management via EfW in mainland Europe, it is also relevant in terms of the waste that is presently exported from the East of



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			England region for final disposal at other locations in the UK.
		It was also noted that the waste types quoted as being available included significant quantities of currently readily recycled or reusable materials. This is ridiculous when Reduce, Reuse and Recycle is accepted as a far preferable process, with residual waste treated using lower carbon options. In addition, the presence of incinerators has been shown to notably reduce recycling rates in those areas tied into incineration contracts	The WFAA (Volume 7.3) [APP-094] considers the availability of only those waste streams that would be suitable for treatment at the proposed Project, and which is currently disposed of by landfill or export. This comprises household, industrial and commercial (HIC) waste predominantly from the European Waste Classification (EWC) chapter 19 (that is waste from waste management facilities) and chapter 20 (that is household waste and similar commercial, industrial and institutional wastes).
RR-436	Sheila McGrath Clark	This is an area of low population with low waste, so it means we have to bear the brunt of waste from high population areas being brought into this area by petrol heavy vehicles, the waste would have to travel long distances. THIS DOES NOT MAKE SENSE.	ES Chapter 2 Alternatives (Volume 6.2) [APP-029] sets out the site selection process and the reasons why the EfW CHP Facility Site is considered suitable.
		Incinerators should be built near to high populated areas so nothing has to travel too far BUT MOST IMPORTANTLY Incineration is outdated, and will increase carbon dioxide, health issues, environmental issues and it is ante Net Zero. RECYCLING or PREVENTION should be the priority.	The WFAA (Volume 7.3) [APP-094] considers the availability of only those waste streams that would be suitable for treatment at the proposed Project, and which is currently disposed of by landfill or export. This comprises household, industrial and commercial (HIC) waste predominantly from the European Waste Classification (EWC) chapter 19 (that is waste from waste management facilities) and chapter 20 (that is household waste and similar commercial, industrial and institutional wastes).



Reference	Consultee	Summary of representation	Applicant response
RR-211	Colin Davies	The scale is far in excess of local requirements and the small amount of energy generated does not justify the massive impact on the environment.	The WFAA (Volume 7.3) [APP-094] has assessed the local requirement for the Proposed Development as well as the national need. This has concluded that there is insufficient residual waste management capacity available to ensure that non-recyclable waste can be managed as far up the waste hierarchy as possible (i.e., diverted from landfill) and in a manner which complies with the proximity principle (i.e., treating waste as close as possible to its point of arising). Whilst this latter point is especially relevant for the significant quantities of residual waste that are presently exported from England for management via EfW in mainland Europe, it is also relevant in terms of the waste that is presently exported from the East of England region for final disposal at other locations in the UK.
		This facility could reduce recycling rates as it will need more fuel than that provided by non-recyclable material.	The WFAA (Volume 7.3) [APP-094] considers the availability of only those waste streams that would be suitable for treatment at the proposed Project, and which is currently disposed of by landfill or export. This comprises household, industrial and commercial (HIC) waste predominantly from the European Waste Classification (EWC) chapter 19 (that is waste from waste management facilities) and chapter 20 (that is household waste and similar commercial, industrial and institutional wastes).
RR-418	Patricia Eveline Lecompte	It is not the right project for Wisbech: 5) Burning waste and plastics is not a solution for any reduction in	The WFAA (Volume 7.3) [APP-094] considers the availability of only those waste streams that would be suitable for treatment at the proposed Project, and



Reference	Consultee	Summary of representation	Applicant response
	usage Manning	pollution: the policy should be to eliminate a or reduce and recycle.	which is currently disposed of by landfill or export. This comprises household, industrial and commercial (HIC) waste predominantly from the European Waste Classification (EWC) chapter 19 (that is waste from waste management facilities) and chapter 20 (that is household waste and similar commercial, industrial and institutional wastes).
RR-340	Angie Horton	also the amount of waste needed to generate something this size would be ridiculous and mean waste being carried here from hundreds of miles radius to try to keep it goingwhat has happened to RECYCLING!!!! Surely a more worthwhile cause !! After all isn't it that we have been working towards for many many years now and about cutting down our carbon footprint?	The WFAA (Volume 7.3) [APP-094] considers the availability of only those waste streams that would be suitable for treatment at the proposed Project, and which is currently disposed of by landfill or export. This comprises household, industrial and commercial (HIC) waste predominantly from the European Waste Classification (EWC) chapter 19 (that is waste from waste management facilities) and chapter 20 (that is household waste and similar commercial, industrial and institutional wastes).
RR-434	Amanda McGrath	All local councils have voted against it, there are enough incinerators in the area already and we should be recycling and not incinerating.	The WFAA (Volume 7.3) [APP-094] has assessed the local requirement for the Proposed Development as well as the national need. This has concluded that there is insufficient residual waste management capacity available to ensure that non-recyclable waste can be managed as far up the waste hierarchy as possible (i.e., diverted from landfill) and in a manner which complies with the proximity principle (i.e., treating waste as close as possible to its point of arising). Whilst this latter point is especially relevant for the significant quantities of residual waste that are presently exported from England for management via



Reference	Consultee	Summary of representation	Applicant response
RR-280	Will Gilbert	The need for such a construction is questionable. Why is such a vast incinerator needed?	<p>EfW in mainland Europe, it is also relevant in terms of the waste that is presently exported from the East of England region for final disposal at other locations in the UK.</p> <p>Additionally, The WFAA (Volume 7.3) [APP-094] considers the availability of only those waste streams that would be suitable for treatment at the proposed Project, and which is currently disposed of by landfill or export. This comprises household, industrial and commercial (HIC) waste predominantly from the European Waste Classification (EWC) chapter 19 (that is waste from waste management facilities) and chapter 20 (that is household waste and similar commercial, industrial and institutional wastes).</p> <p>The WFAA (Volume 7.3) [APP-094] has assessed the local requirement for the Proposed Development as well as the national need. This has concluded that there is insufficient residual waste management capacity available to ensure that non-recyclable waste can be managed as far up the waste hierarchy as possible (i.e., diverted from landfill) and in a manner which complies with the proximity principle (i.e., treating waste as close as possible to its point of arising). Whilst this latter point is especially relevant for the significant quantities of residual waste that are presently exported from England for management via EfW in mainland Europe, it is also relevant in terms of the waste that is presently exported from the East of</p>



Reference	Consultee	Summary of representation	Applicant response
RR-380	Councillor Alexandra Kemp (Borough of King's Lynn and West Norfolk)	As the County Councillor for Clenchwarton and King's Lynn South, I object to the facility as -: 1. The incinerator is not needed as there is an oversupply of incinerators in the East of England.	England region for final disposal at other locations in the UK.
		As the County Councillor for Clenchwarton and King's Lynn South, I object to the facility as -: 2. Glass, wood, paper, metals food and food containers can all be recycled. As new technologies come forward to replace or reuse plastics, the whole concept of incineration has become obsolete. The future for plastic is prevention or reuse.	The WFAA (Volume 7.3) [APP-094] has assessed the local requirement for the Proposed Development as well as the national need. This has concluded that there is insufficient residual waste management capacity available to ensure that non-recyclable waste can be managed as far up the waste hierarchy as possible (i.e., diverted from landfill) and in a manner which complies with the proximity principle (i.e., treating waste as close as possible to its point of arising). Whilst this latter point is especially relevant for the significant quantities of residual waste that are presently exported from England for management via EfW in mainland Europe, it is also relevant in terms of the waste that is presently exported from the East of England region for final disposal at other locations in the UK.
			The WFAA (Volume 7.3) [APP-094] considers the availability of only those waste streams that would be suitable for treatment at the proposed Project, and which is currently disposed of by landfill or export. This comprises household, industrial and commercial (HIC) waste predominantly from the European Waste Classification (EWC) chapter 19 (that is waste from waste management facilities) and chapter 20 (that is household waste and similar commercial, industrial and institutional wastes).



Reference	Consultee	Summary of representation	Applicant response
		<p>As the County Councillor for Clenchwarton and King's Lynn South, I object to the facility as -: AGAINST THE CIRCULAR ECONOMY 3. Building new incinerators would deter recycling. Incineration is against the circular economy.</p>	<p>The WFAA (Volume 7.3) [APP-094] considers the availability of only those waste streams that would be suitable for treatment at the proposed Project, and which is currently disposed of by landfill or export. This comprises household, industrial and commercial (HIC) waste predominantly from the European Waste Classification (EWC) chapter 19 (that is waste from waste management facilities) and chapter 20 (that is household waste and similar commercial, industrial and institutional wastes).</p>
		<p>As the County Councillor for Clenchwarton and King's Lynn South, I object to the facility as -: BREACH OF PROXIMITY PRINCIPLE 4. The facility would be a breach of the proximity principle, as waste could be transported from up to 2 hours away onto rural roads. Waste could be transported from areas of high population like London to areas of the lowest population like the Fens.</p>	<p>Waste markets in the UK are directly influenced by a range of factors including waste type, availability of management capacity and government fiscal, waste management and planning policies. Whilst waste should be managed as close as possible to its point of origin, the complex range of influencing factors inevitably means there is a flow of material across the country (and beyond). In this context, it is important to recognise that the Proposed Development is likely to draw in waste from a wider area, than say, simply Cambridgeshire, and that over the life of the Proposed Development, the area from which it will receive waste material is likely to change.</p> <p>The local analysis of need has been based on the area that the Proposed Development is most likely to draw waste in from. This has been defined as an area approximately a 2-hour drive time from the Proposed Development. It is generally commercially viable to transport non-hazardous household, industrial and</p>



Reference	Consultee	Summary of representation	Applicant response
RR-216	Andrew Michael Whalley	<p>1. Need: England is at incineration overcapacity. Defra statistics show that “Waste sent for incineration increased by 0.8 million tonnes (7.7 per cent) to 12.5 million tonnes in 2020/21 compared to 2019/20. It was the disposal method used for 48.2 per cent of all local authority waste.” However, The Circular Economy Package includes a target to recycle 65% of municipal waste by 2035 and measures to reduce the amount of waste sent to landfill or incinerated. Furthermore, in 2020, Defra reported “Of total residual waste from household sources in England in 2017, an estimated 53% could be categorised as readily recyclable, 27% as potentially recyclable, 12% as potentially substitutable and 8% as difficult to either recycle or substitute.” The government has pledged to leave the environment in a better condition for the next generation through eliminating avoidable plastic waste over the lifetime of the 25 Year Environment Plan, doubling resource productivity by 2050, and eliminating avoidable waste of all kinds by 2050. Means to realise Government ambition include:</p>	<p>commercial waste from up to around 2 hours away, over 2 hours the haulage cost becomes increasingly expensive. However, the application of the 2-hour drive time in the WFAA (Volume 7.3) [APP-094] is a tool has been used to indicate broadly where the Proposed Development is likely to draw waste in from and was never intended to act as a ‘hard and fast’ catchment area.</p>
			<p>The WFAA (Volume 7.3) [APP-094] includes considerations around the availability of fuel should higher (65%) recycling targets be achieved. In this regard, the WFAA concludes that by 2030, it is predicted that even if the Government’s ambitious combined recycling target of 65% for municipal and ‘municipal like’ commercial and industrial waste is realised, there would remain a minimum shortfall of 2.8 million tonnes of residual HIC capacity in the UK (rising to over 6 million tonnes if the Government’s recycling target is undershot by 5%).</p>



Reference	Consultee	Summary of representation	Applicant response
		<p>Household food waste to be collected separately by 2023 Extended Producer Responsibility (EPR) for packaging from 2024. Deposit Return Scheme in England, anticipated to launch in late 2024. Additional incineration capacity is incompatible with HM Government policy.</p>	
		<p>2. Proximity Principle. UK ambition cannot meet incineration demands. Both Cambridgeshire County Council and Norfolk County Council have recorded their “in principle” objection to the Medworth proposal, so where will the waste come from? Will waste need to be imported during the lifetime of the plant? Is this consistent with the expectation that waste should generally be disposed of as near to its place of origin as possible?</p>	<p>Waste markets in the UK are directly influenced by a range of factors including waste type, availability of management capacity and government fiscal, waste management and planning policies. Whilst waste should be managed as close as possible to its point of origin, the complex range of influencing factors inevitably means there is a flow of material across the country (and beyond). In this context, it is important to recognise that the Proposed Development is likely to draw in waste from a wider area, than say, simply Cambridgeshire, and that over the life of the Proposed Development, the area from which it will receive waste material is likely to change.</p> <p>The local analysis of need has been based on the area that the Proposed Development is most likely to draw waste in from. This has been defined as an area approximately a 2-hour drive time from the Proposed Development. It is generally commercially viable to transport non-hazardous household, industrial and commercial waste from up to around 2 hours away, over 2 hours the haulage cost becomes increasingly expensive. However, the application of the 2-hour drive time in the WFAA (Volume 7.3) [APP-094] is a</p>

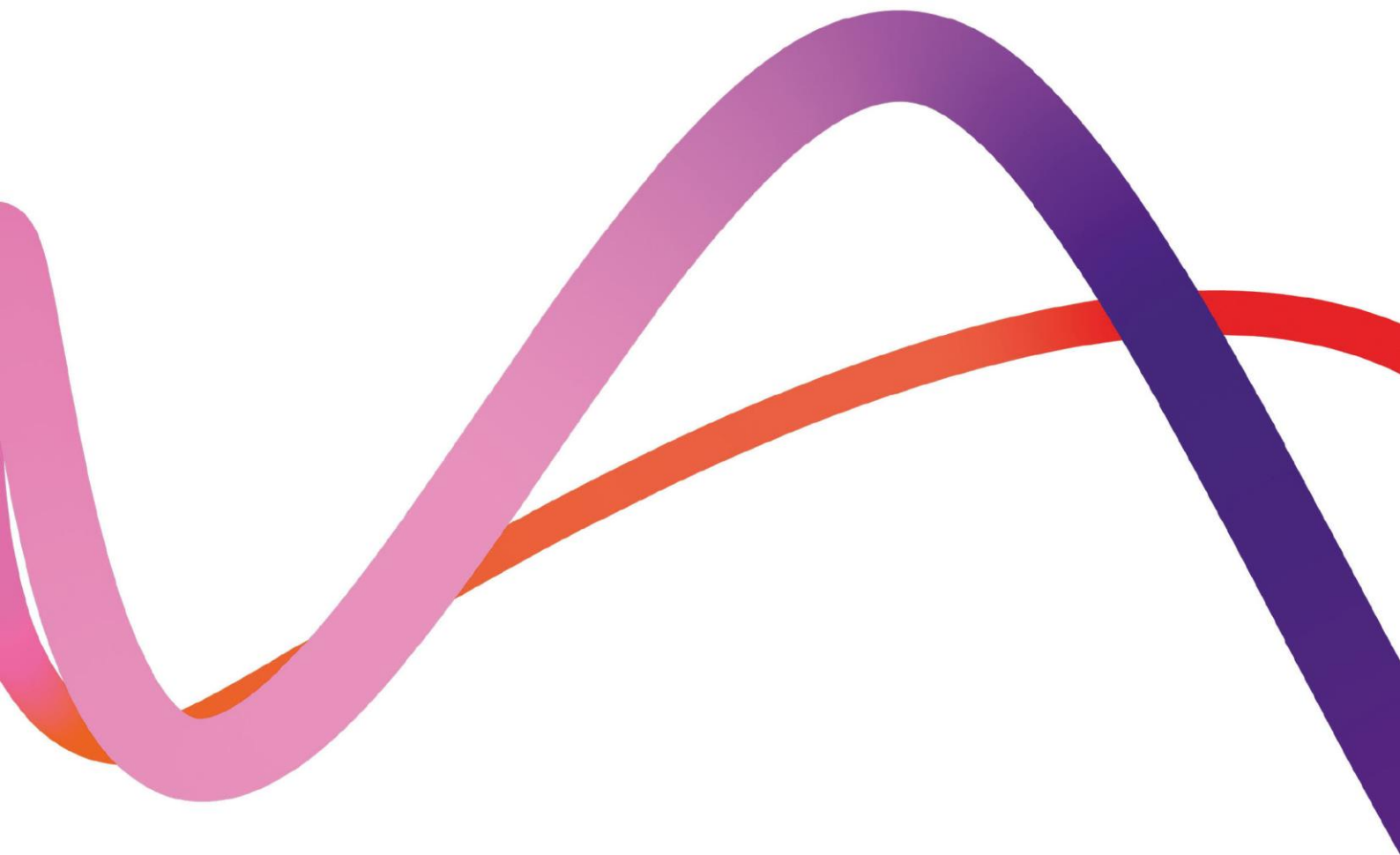


Reference	Consultee	Summary of representation	Applicant response
			tool has been used to indicate broadly where the Proposed Development is likely to draw waste in from and was never intended to act as a 'hard and fast' catchment area.

Annex A

R1 Calculation Pro-forma

A	B	C	D	E	F	G	H	I	
PROFORMA FOR DETERMINING ENERGY EFFICIENCY USING R1									
1	Site name, address and grid reference	Medworth Energy from Waste Combined Heat and Power Facility, Alorges Way, Wisbech, Cambridgeshire, PE13 2TQ	EPR Permit reference (if known)	EPR/VP3705BL/A001					
2	Operator name	Medworth CHP Ltd	Application fee (£)	Included with permit application fee					
3	Details of who to contact if we have any queries regarding this form	For the contact details provided on form Part A							
4	What data has been used in the application? →	Design data							
5	Indicative R1 factor (subject to confirmation)	0.81	Quantity in reporting year	Units	U _r	Properties (Average over reporting year)	Units	Note which parameters that have been	
6	Climate change correction factor (optional)	1.12						Reference to Supporting information	
7	R1 after CCF adjustment	0.90							
8									
9	1. Gross electricity meter (Electricity produced at turbine)	480000	MWh						
10	2. Electricity exported - Net input/output meter	440000	MWh						
11	5. Electricity imported - Net input/output meter	352.72	MWh						
12	4. Other fuel inputs								
13	4.1 Light fuel oil	162280	litres			0.88	kg/l	Digest of UK Energy S	
14	4.2 Natural gas		Nm ³			42008	kJ/kg		
15	4.3 LPG		Nm ³			34200	kJ/Nm ³		
16	4.4 Other fuels similar to light fuel oil		litres				kg/l		
17									
18									
19									
20									
21	6. Primary combustion air (as supplied to furnace)	21690222	m ³			0.942	kg/m ³		
22						99.97	°C		
23						75.7197	kJ/kg		
24	6. Secondary combustion air (as supplied to furnace)	971588133	m ³			1.146	kg/m ³		
25						33.72	°C		
26						8.8072	kJ/kg		
27	7. Recycled flue gas (as supplied to furnace)		m ³				kg/m ³		
28							°C		
29							kJ/kg		
30	8. Heat exported outside R1 boundary								
31	8.1 steam exported		tonnes				°C		
32							kPa		
33							kJ/kg		
34	condensate returned		tonnes				°C		
35							kPa		
36	8.2 hot water exported		tonnes				kJ/kg		
37							°C		
38							kPa		
39	hot water returned		tonnes				kJ/kg		
40							°C		
41							kPa		
42							kJ/kg		
43									
44	9. Internal steam use								
45	9.1 for soot blowing (no backflow)		tonnes				°C		
46							kPa		
47							kJ/kg		
48	9.2 for steam driven devices		tonnes				°C		
49							kPa		
50							kJ/kg		
51	backflow as steam		tonnes				°C		
52							kPa		
53							kJ/kg		
54	9.3 for trace heating		tonnes				°C		
55							kPa		
56							kJ/kg		
57	backflow as condensate		tonnes				°C		
58							kPa		
59							kJ/kg		
60	9.4 for re-heating flue gas		tonnes				°C		
61							kPa		
62							kJ/kg		
63	backflow as condensate		tonnes				°C		
64							kPa		
65							kJ/kg		
66	9.5 for concentration processes		tonnes				°C		
67							kPa		
68							kJ/kg		
69	backflow as condensate		tonnes				°C		
70							kPa		
71							kJ/kg		
72	9.6 for building, equipment, tank heating		tonnes				°C		
73							kPa		
74							kJ/kg		
75	backflow as condensate		tonnes				°C		
76							kPa		
77							kJ/kg		
78	9.7 for desalination and demineralisation		tonnes				°C		
79							kPa		
80							kJ/kg		
81	backflow as condensate		tonnes				°C		
82							kPa		
83							kJ/kg		
84	9.8 other internal applications, in line with commission guidance, to be specified		tonnes				°C		
85							kPa		
86							kJ/kg		
87	backflow as condensate		tonnes				°C		
88							kPa		
89							kJ/kg		
90	9.9 other internal applications, in line with commission guidance, to be specified		tonnes				°C		
91							kPa		
92							kJ/kg		
93	backflow as condensate		tonnes				°C		
94							kPa		
95							kJ/kg		
96	10. Use of condensing energy from steam in flue gas		DJ						
97	11. Superheated steam at boiler outlet	2011200	tonnes			380	°C		
98						4619	kPa		
99						3155	kJ/kg		
100	12. Boiler feedwater	2030400	tonnes			131.3	°C		
101						6369	kPa		
102						556.24	kJ/kg		
103	13. Boiler Efficiency (Design)	90%				1.5%			
104	Instructions for completing this spreadsheet								
105	1. Ensure that you have completed the first three rows of the application form								
106	2. This form should be accompanied by supporting information for the figures quoted. Where this information is in the permit application, reference to the relevant sections of the application can be made.								
107	A Sankey diagram (or equivalent) reflecting the boundaries of the installation used as well as any references to physical properties is the absolute minimum that should be provided for an application based on design information								
108	3. We have colour coded the cells in this spreadsheet to assist you in completing this form, an explanation of the colour codes is provided below. The colour will disappear when data has been entered.								
109	Blue cells require data that is essential for the R1 calculation, where information on uncertainty of the data is available it would be useful (but not mandatory) for this to be included for these parameters.								
110	Beige Cells indicate that any data entered will be used in the R1 calculation. They have been used where there is a choice of inputs but not all plants will have data for all the input options.								
111	Where you are entering data into beige cells you need to make sure that you enter data into all the beige cells associated with the input as they are needed for carrying out the calculation.								
112	Yellow cells have been used to provide flexibility to include fuels or energy uses not identified elsewhere. Supporting information to explain why the standard fields were not appropriate or adequate will need to be provided where these cells are used.								
113	Data entered in uncoloured cells are not used when calculating the R1 energy efficiency factor but can be completed to provide a more complete data set.								
114	Data in the purple cell for the CCF factor is optional. If used the way it was calculated must be explained in supporting information								
115	4. Ensure the temperatures entered into cells F19 and F22 (and F25) are the actual temperatures of the heated air i/c.								
116	The spreadsheet uses these values to calculate the specific enthalpy associated with heating the air from ambient 25C in cells F20 and F23 (and standard fields were not appropriate or adequate will need to be provided where these cells are used)								
117	5. Densities used in cells F18 and F21 (and F24) should be at the temperatures at which the flows quoted in C18 and C21 (and C24) are reported.								
118	The spreadsheet multiplies these pairs of entries to generate a mass of air.								
119	6. If you believe that any of the information that you have submitted in this application form is commercially confidential please identify the confidential information and the grounds on which you believe it to be confidential in your covering letter.								
120	JF 8753								
121	AD0812/viv3								



Medworth Energy from Waste
Combined Heat and Power Facility

February 2022



**Interested Party: Fountain Frozen
Limited – Relevant
Representation APP-015**

**We inspire
with energy.**



Contents

1. Summary 2

Table 1.1 Extract of Summary Issue Tables (Appendix JJ of the Consultation Report (Volume 5.1) relevant to Fountain Frozen Ltd representation dated 11 August 2021. 2

Annex A Frazer Dawbarns LLP letter dated 12 August 2021
Annex B Frazer Dawbarns LLP letter dated 11 August 2021



1. Summary

- 1.1.1 This note responds to Relevant Representation 015 (RR-015) submitted by Fraser Dawbarns LLP on behalf of Fountain Frozen Limited.
- 1.1.2 RR-015 states:
- “I represent Fountain Frozen Limited who occupy premises next to the proposed site and object to the project and lodged their objections in the initial consultation stage by letter which did not seem to appear in the documents presented and upon which the approval for Examination was granted. My client wishes to continue to object to this project being approved due to the likely impact on it's business, staff and premises”.*
- 1.1.3 The matter raised in RR-015 was addressed in **Appendix JJ** of the **Consultation Report (Volume 5.1) [APP-022]**; submitted with the DCO Application. **Appendix JJ** presents a series of topic-based summary issue tables of matters raised during the Applicant’s Statutory Consultation by third parties. Since receiving Frazer Dawbarns letter, on behalf of Fountain Frozen Ltd, dated 12 August 2022 (**Annex A**), the Applicant checked **Appendix JJ** of the **Consultation Report**.
- 1.1.4 The Applicant confirms, those matters raised by Fountain Frozen Limited during the Statutory Consultation (see **Annex B**) were considered, summarised and a response provided in **Appendix JJ**. However, rather than state “Fountain Frozen Limited” in the Respondent columns of the tables within **Appendix JJ**, they were listed as “Local Community”.
- 1.1.5 At a meeting on the 23 February 2023 with Fountain Frozen Limited, the Applicant explained the aforementioned and confirmed they would issue the relevant extracts from **Appendix JJ** and update these with the Examination Library Application Document references ([APP-xxx]). This note presents the relevant extracts from **Appendix JJ**, see **Table 1.1**.

Table 1.1 Extract of Summary Issue Tables (Appendix JJ of the Consultation Report (Volume 5.1) relevant to Fountain Frozen Ltd representation dated 11 August 2021.

ID	Issue raised	The Applicant’s Response
AQ30	Concern that any dust or additional heat will likely have an effect on the air filtration systems and the cooling systems in other local businesses near to the site of the proposed development.	The EfW CHP Facility includes high efficiency bag filters to remove particulates. ES Appendix 8B: Air Quality Technical Report (Volume 6.4) [APP-078] reports the chimney height modelling that was used to define an acceptable height to ensure adequate dispersion. This will ensure that emissions are diluted sufficiently to avoid impacts upon people and upon the operations, including air filtration and cooling systems, of local businesses.
CO04	Concern that the increased traffic during construction will make the area unsafe for the community.	The environmental impacts of the Proposed Development including those associated with traffic and pedestrian and road safety and during construction, have been assessed



ID	Issue raised	The Applicant's Response
CO05	Concern that the increased volume of traffic during construction will have an effect on local roads.	<p>and reported in the ES Chapter 6: Traffic and Transport (Volume 6.2) [APP-033] which concludes that with additional mitigation in place that effects would not be significant.</p> <p>Where necessary, embedded mitigation is included within the design of the Proposed Development including the construction phase. The Outline CEMP (Volume 7.12) [APP-103] and Outline CTMP (ES Appendix 6A: Outline CTMP (Volume 6.4)) provide a framework for detailed management plans to be prepared at detailed design stage, in order to minimise and mitigate impacts and/or disruption that may arise from the construction phase. The Outline CEMP includes management plans to be secured by a DCO requirement, specifically Dust Mitigation Measures (Appendix A) and Outline Construction Noise and Vibration (Appendix F). In addition, an Outline CTMP has been produced to support the Environmental Statement.</p>
CO06	Concern that the nearby stream could be compromised by construction processes and present flood risk to nearby properties.	<p>The environmental impacts of the Proposed Development including those associated with protection of watercourses and flood risk during construction, have been assessed and reported in the ES Chapter 12: Hydrology (Volume 6.2). Appendix 12A (Volume 6.4) [APP-084] presents the Applicant's Flood Risk Assessment (FRA). The assessments conclude that effects would not be significant.</p> <p>An Outline CEMP (Volume 7.12) [APP-103] has been prepared and is submitted with the DCO application. The Outline CEMP includes waste management, pollution prevention and flood risk protocols along with outline management plans relating to: Water Management (Appendix B), Ecology (Appendix D), and Site Materials and Waste Management (Appendix E) to be updated at detailed design stage and secured by a DCO Requirement, in order to minimise and mitigate impacts and/or disruption that may arise from the construction phase.</p>
CO08	Concern that vibration during construction of the proposed facility will cause damage to nearby property and infrastructure.	<p>The environmental impacts of the Proposed Development including those associated with noise and vibration during construction, have been assessed and reported in the ES Chapter 7: Noise and Vibration (Volume 6.2) [APP-034]. The assessments conclude that effects would not be significant with additional mitigation in place.</p> <p>To minimise potential vibration effects, driven piling does not form part of the Proposed Development, instead the Applicant's EPC Contractor will be required to use a continuous flight auger piling technique.</p> <p>Where necessary, embedded mitigation is included within the design of the Proposed Development including the construction phase. The Outline CEMP (Volume 7.12) [APP-103] and Outline CTMP (ES Appendix 6A: Outline CTMP (Volume 6.4)) provide a framework for detailed</p>



ID	Issue raised	The Applicant's Response
		<p>management plans to be prepared at detailed design stage, in order to minimise and mitigate impacts and/or disruption that may arise from the construction phase. The Outline CEMP includes management plans to be secured by a DCO requirement, specifically Dust Mitigation Measures (Appendix A) and Outline Construction Noise and Vibration (Appendix F). In addition, an Outline CTMP has been produced to support the Environmental Statement.</p>
EV07	<p>Concern that the proposed mitigation measures within the CEMP in relation to invasive species are not sufficiently detailed.</p>	<p>The Outline CEMP (Volume 7.12) [APP-103] submitted with the DCO Application provides more detail on the proposed embedded measures. The Outline CEMP is secured by Requirement 10, Schedule 2, Draft DCO [APP-013].</p>
EV08	<p>Concern that the proposed mitigation measures within the CEMP in relation to water courses are not sufficiently detailed.</p>	<p>The Outline CEMP (Volume 7.12) [APP-103] submitted with the DCO Application provides more detail on the proposed embedded measures. The Outline CEMP is secured by Requirement 10, Schedule 2, Draft DCO [APP-013].</p>
HW01	<p>Concern that the proposed development does not consider the WHO guidance in relation to the siting of EfW technology within a 30 mile radius of a food growing area or a centre of population due to pollution levels.</p>	<p>It is the Applicant's understanding that the "WHO guidance" referred to relates to a report titled <i>Findings on an Assessment of Small-scale Incinerators for Health-care Waste, S Batterman (2004)</i>. This report provides an analysis of low-cost small-scale incinerators used to dispose of healthcare waste in developing countries. Research papers can be unintentionally misinterpreted and/or misapplied in relation to energy from waste proposals and the Applicant believes this might be the case here.</p> <p>All EfW facilities in England require an EP from the Environment Agency to operate. The EP will set the emission limits for the facility and requires an operator to continuously monitor the emissions and submit results to the EA. The EA also have the power to undertake announced and unannounced site visits to verify emissions data, and in cases where there is a risk of serious pollution, to suspend the environmental permit.</p> <p>To inform the ES, the Applicant consulted Public Health England (PHE) (now UK Health Security Agency and Officer for Health Improvement and Disparities). PHE confirmed in their response dated 17 August 2021 that: <i>"...Regarding emissions to air from municipal energy from waste developments, PHE has reviewed published research to examine the suggested links between emissions from municipal waste incinerators and effects on health</i> <i>(https://www.gov.uk/government/publications/municipal-waste-incinerators-emissions-impact-on-health). PHE's risk assessment remains that modern, well run and regulated municipal waste incinerators are not a significant</i></p>



ID	Issue raised	The Applicant's Response
DP04	Objection to the proposals for an energy-from waste combined heat and power facility at Wisbech.	<p><i>risk to public health. While it is not possible to rule out adverse health effects from these incinerators completely, any potential effect for people living close by is likely to be very small..."</i></p> <p>Comment is noted. National policy relevant to the determination of the DCO for the Proposed Development is stated in the following documents:</p> <ul style="list-style-type: none"> • Overarching National Policy Statement for Energy (EN-1); • National Policy Statement for Renewable Energy Infrastructure (EN3); and • National Policy Statement for Electricity Networks Infrastructure (EN5). <p>The Applicant is aware that these National Policy Statements are under review and consequently, as part of the planning policy assessment that accompanies the DCO Application, the Applicant has reviewed these emerging policy documents to check compliance. The Applicant's planning assessment concludes, the Proposed Development is supported by adopted and emerging national policy. Further details of the policy assessment are reported in the Planning Statement (Volume 7.1) [APP-071].</p>
SE18	Concern that if pests become prevalent the Proposed Development will pose a risk to the survival of a nearby food related business.	<p>To monitor and control pests, insects and vermin, specialist firms will be contracted to undertake regular inspections of the EfW CHP Facility Site. Bait boxes will be maintained around the perimeter of the EfW CHP Facility if required.</p> <p>ES Chapter 15: Socio-Economics, Tourism, Recreation and Land Use (Volume 6.2) [APP-042] assesses impacts on local businesses arising from the construction and operation of the Proposed Development at a more holistic level and concludes, there will be not significant effects.</p>
SE19	Concern that the Proposed Development will have a damaging effect on the profitability of a nearby food related business including the effect on the Pension Trust that owns the land.	<p>It is unclear the means by which the Proposed Development would affect the profitability of nearby food businesses. ES Chapter 3: Description of the Proposed Development (Volume 6.2) [APP-030] states that the Applicant is providing an opportunity for local food businesses to take heat and electricity from the Proposed Development which could support them in reducing their emissions and potentially provide commercially attractive sources of power which could support their profitability.</p> <p>ES Chapter 15: Socio-Economics, Tourism, Recreation and Land Use (Volume 6.2) [APP-042] assesses impacts on local businesses. It considers both the potential benefits arising from local supply chain opportunities through to the potentially negative effects arising from disruption during construction for example. In all cases the conclusion reached is that effects would not be significant.</p>



ID	Issue raised	The Applicant's Response
SE21	Request for clarification as to whether compensation will be made available should businesses suffer financial loss as a result of the proposed development.	The Applicant will comply with the relevant land compensation regime applicable to the Proposed Development. At this stage, the Applicant does not consider it likely that any local businesses will suffer a financial loss as a result of the Proposed Development. However, if a small business was affected by physical factors (such as noise) during the operation of the Proposed Development, and such factors results in a diminution in value, a claim for compensation can be made under Part 1 of the Land Compensation Act 1973.
TT12	Concern that increase traffic will further damage local roads.	The maintenance of the local and strategic road network is the responsibility of National Highways (NH), Cambridgeshire County Council (CCC) and Norfolk County Council (NCC). Appendix 6A Outline CTMP (Volume 6.4) [APP-103] confirms the Applicant will appoint an independent contractor to undertake a highway condition survey of before and after construction of the Proposed Development. Any damage caused by the construction activities can be repaired by the Applicant and the road returned to the previous condition.
TT13	Concern about the increase in traffic on the A47 and how it would affect daily life.	The environmental impacts of the Proposed Development including road junction analysis, has been assessed and reported in ES Chapter 6 Traffic and Transport (Volume 6.2) and accompanied by Appendix 6B Transport Assessment (Volume 6.4) [APP-073] . Within these assessments, daily and peak hourly assessments are provided including detailed link and junction assessment for both the operational and construction period as appropriate. These assessments have been undertaken for the A47 between Kings Lynn and the A47 Guyhirn Roundabout and they assess all the links and junctions in this section of the A47. No significant effects have been identified.
TT21	Concern about the increase in traffic in the area and its effects.	<p>The environmental impacts of the Proposed Development including road capacity and HGV movements, have been assessed and reported in ES Chapter 6 Traffic and Transport (Volume 6.2) and accompanied by Appendix 6B Transport Assessment (Volume 6.4). Within these assessments, daily and peak hourly assessments are provided including detailed link and junction assessment for both the operational and construction period as appropriate. The Proposed Development also includes for improvements to New Bridge Lane which include for widening, a footpath and pedestrian crossing points. With these improvement measures in place the assessments conclude that there will be no significant residual effects resulting from the increase in HGV traffic.</p> <p>Where necessary, embedded mitigation is included within the design of the Proposed Development and ongoing operational management plans will ensure that the EfW</p>



ID	Issue raised	The Applicant's Response
		<p>CHP Facility will continue to be operated appropriately. The operational management plans related to traffic and transportation will be secured by DCO Requirements [APP-013] and include:</p> <ul style="list-style-type: none"> • CEMP, includes a requirement for a Construction Staff Travel Plan; [APP-103] • CTMP; [APP-103] • Operational Travel Plan [APP-074]; and • OTMP [APP106].
TT52	Complaint that the A47 is the only road in and out of Wisbech and is single-carriageway.	<p>The environmental impacts of the Proposed Development including highway capacity, has been assessed and reported in ES Chapter 6 Traffic and Transport (Volume 6.2) accompanied by Appendix 6B Transport Assessment (Volume 6.4) [APP-073]. Within these assessments, daily and peak hourly assessments are provided including detailed link and junction assessment for both the operational and construction period as appropriate. These assessments consider the A47 as a key access route to the site and conclude that it would not be significantly affected.</p>
TT60	Concern that HGVs would need to re-route through unsuitable local roads during periods of congestion and road closures.	<p>In the event of road closures, like all road users, the Applicant would follow the Highways Authority route diversion(s).</p> <p>ES, Appendix 6B Transport Assessment (Volume 6.4) [APP-073] sets out the proposed traffic generation and this does not indicate any significant additional congestion issues as a result of the Proposed Development.</p>





Annex A Frazer Dawbarns LLP letter dated 12 August 2021

Date: 12 August 2021
Your Ref:
Our Ref: NJ/JB/F01959/0029

1-3 York Row
Wisbech
Cambridgeshire
PE13 1EA

BY EMAIL ONLY

Telephone: 
Fax: 
www.fraserdawbarns.com

Email: medworth@mvvuk.co.uk

Dear Sirs

Re: Mega Incinerator
Our client: Fountain Frozen Limited

Our client has been provided with a copy of the Planning Inspectorate's decision of 02 August 2022 in relation to the above matter. It notes with some dismay that the accompanying documents do not appear to contain the consultation response lodged on behalf of our client last August. Our client sincerely hopes that this omission is an oversight rather than a deliberate attempt to mislead the Planning Inspectorate.


Please confirm why the responses of our client were omitted from your reports.

As a matter of courtesy, we enclose a copy of a letter we have written to the Planning Inspectorate addressing this point.

We await hearing from you.

Yours faithfully


Fraser Dawbarns LLP

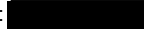

Direct Phone Line: 

Email: 

Enc: Copy of letter to the Planning Inspectorate

Date: 12 August 2022
Your Ref: EN010110
Our Ref: NJ/JB/F01959/0029

1-3 York Row
Wisbech
Cambridgeshire
PE13 1EA

Telephone: 
Fax: 
www.fraserdawbarns.com

The Planning Inspectorate
Infrastructure Planning
Temple Quay House
2 The Square
Bristol
BS1 6PN

RECORDED DELIVERY POST

Dear Sirs

Re: Application by Medworth CHP Limited for an Order granting development consent for Medworth Energy and Waste Combined Heat and Power Facility (EN010110)
Our client: Fountain Frozen Limited

We act for our named client and have done so for some time. We were instructed last year regarding the above captioned plans and the consultation documents put forward by the applicant.

On behalf of our client, we completed the proforma consultation document which was served by Freepost and email. This was acknowledged as received on 12 August 2021. This was in response to the statutory consultation put out by Medworth.




You will no doubt be aware from the response to the consultation put forward by our client that Fountain Frozen Limited is the closest business geographically to the tipping hall of the proposed development and is a food factory. It employs approximately 97 people and the effect of the application being passed is likely to have a catastrophic effect on our client's business and the area on a wider basis. Not only does the plan potentially adversely affect the business but also the company's pension fund which owns the land on which the business operates.

Our client was therefore alarmed when receiving Notice of the Decision to accept the application for examination dated 02 August 2022 that its response to the consultation did not appear in the papers submitted to the Planning Inspectorate. Our client sincerely hopes this is merely an oversight and not a deliberate attempt to mislead the Planning Inspectorate. We submit, our client's position should be considered when the Planning Inspectorate makes a decision on this issue and as such, we invite you to revisit the decision having considered our client's justifiable objections.

We await your confirmation that you have now had the opportunity to consider our client's position/consultation responses and have reviewed the decision to accept the application for examination accordingly.

We thank you for your assistance in this matter and await hearing from you.

Yours faithfully


Fraser Dawbarns LLP
Direct telephone number: 
Email: 



Annex B Frazer Dawbarns LLP letter dated 11 August 2021

Date: 11 August 2021
Your Ref:
Our Ref: NJ/JB/F01959/0029

1-3 York Row
Wisbech
Cambridgeshire
PE13 1EA

BY EMAIL ONLY

Telephone: [REDACTED]
Fax: [REDACTED]
www.fraserdawbarns.com

Email: medworth@mvvuk.co.uk

Dear Sirs

Re: Mega Incinerator

We refer to the above and enclose the proforma feedback form we have already sent by Freepost to you. You will see the contents and it will come as no surprise to you that our client objects to the proposed development both on a level consistent with the business and the wider community.

We ask that our client's objections are placed on record when the matter goes before the Secretary of State and/or the Planning Inspectorate.

Yours faithfully

[REDACTED]
Fraser Dawbarns LLP

Direct Phone Line: [REDACTED]

Email: [REDACTED]

Encs

cc [REDACTED]



Medwath EfW CHP facility

STATUTORY PUBLIC CONSULTATION

feedback form

get in touch



Medwath CHP Limited invite you to take part in their **statutory consultation**, which is a legal requirement of the application process for a **Development Consent Order**. We recognise the importance of working with the **local community** to understand the issues that are **important to you**.

Please take some time to fill in this feedback form; your views will help to shape and finalise our proposals for the Medwath EfW CHP Facility.

You do not have to provide your personal details, but this information will help us to understand the range of responses and enable us to send you further information relating to the proposed Medwath EfW CHP Facility.

Any personal data received as part of the consultation or as part of the consultation process will be stored and protected in accordance with our Privacy Notice (www.mvv-medwathchp.co.uk/consultation-privacy-notice).

Title	First name	Surname
-------	------------	---------

Email address	Mobile number
---------------	---------------

House name or number	Street name	Town or city
----------------------	-------------	--------------

County	Postcode
--------	----------

Are you responding on behalf of an organisation?

Yes No

If so, which organisation?

Fountain Frozen Limited

We are committed to honest, open and effective **two-way engagement** and welcome your views and feedback.

There have been some changes to our proposals since the non-statutory consultation, based on feedback received. Please take the time to look at our consultation documents as we are keen to understand your thoughts on the following aspects of the proposed Medworth EfW CHP Facility and associated development:

1. Please tell us what you think about our proposals for the Medworth EfW CHP Facility and associated development.

For more information on our proposals and the measures proposed to reduce impacts in the local area please see the Consultation Booklet and Chapter 3 of the Preliminary Environmental Information Report (PEIR).

We are completely opposed to the Proposed Development. Fountain Frozen Limited is arguably one of the nearest neighbours to the proposed development and our premises on Salters Way are directly behind part of the main building for the proposed development where the tipping hall and tipping bunker/waste bunker are within feet of the rear of our premises. The company employs 97 people at the last review and produces approximately 1.75 million kilogrammes of food products annually. We supply to in excess of 20 nationally and globally recognised customers as well as producing own brand products.

It is noted that paragraph 3.3.4 of the PEIR refers to other developments locally which appear not to have been considered. Paragraph 3.3.5 of the PEIR refers to management of pests. Pest control is a key issue as we operate a food related business. Our very real concern is that the proposed development appears to suggest a daily delivery of somewhere between a minimum of 1,650 and 1,700 tonnes per day of waste based on a 6 day working week and the tipping bunker of being capable of holding 10 days worth of deliveries, this would mean that up to 16,500 - 17,000 tonnes of waste could be in the bunker at any one time.

This would undoubtedly lead to a pest problem in the form of rats, mice, flies and other insects and quite possibly a proliferation of bird life including seagulls. This would undoubtedly lead to a pollution problem as suggested in paragraph 3.3.11 of the PEIR.

We note that the issue with pests is addressed in Fenland District Council's letter dated 23 December 2019 at page 150 of the PEIR.

2. Impact of the development

Please tell us what impact you think the proposed Medworth EfW CHP Facility and associated development will have on you and the local community and why:

For more information on the impacts of the development on the local area please see the Consultation Booklet and the Non-Technical Summary accompanying the PEIR.

The proposed development is entirely likely to have a catastrophic effect on our business. As stated above we produce 1.75 million kilogrammes of prepared food product per annum and supply it to many clients, a number of whom are globally recognisable brands. The tipping hall, tipping bunker and waste bunker are planned to be built only a few feet from the back of our factory. The tipping bunker is expressed to have capacity for 10 days worth of deliveries which at a conservative estimate is somewhere in the region of 16,500 tonnes of waste. The inevitable pest problems from vermin, insects and scavenging birds are likely to cause serious concerns for our clients.

Should even one or two of our clients take their business elsewhere this could have an extremely damaging effect on the profitability of the business. This would have a knock on effect to all 97 people working for the business and the pensioners of the Pension Trust who own the land. If the business fails, the Pension Trust will lose the rental revenue it gains from our use of the land.

Another very real impact is likely to be damage to the factory in the construction process and operation process if the proposed development is allowed to proceed. The factory contains a number of pipes both over and under the ground and has two large fryers running at 190 degrees celsius. We also use and store significant amounts of ammonia for our freezer systems.

The land between the proposed development site and our factory has a small stream which fills with water in periods of heavy rain. In the event that the stream is compromised by the construction or operational processes, the surface water could well flood parts of the factory or the surrounding premises causing damage. contd

3. Do you have any comments on the mitigation measures proposed to reduce the impacts of the proposed Medworth EfW CHP Facility and associated development on the local environment and local community (for example the measures set out in the draft Outline Construction Environmental Management Plan (CEMP))?

The mitigation factors proposed by the Applicant appear principally in the CEMP seem vague to say the least. The reference is made to environmental health in the draft CEMP are noted but are very vague. There is reference to identification and management of invasive species and a management therefor. There is also reference to weekly environmental inspections. While species may become invasive due to the construction process, this does not take into account infestations for things such as vermin or insects. An infestation of rats for example, could take a significant hold and be of epidemic proportions between weekly inspections. No provision is identified to prevent such an infestation.

If rats became prevalent, the risk to the survival of the business is very real. Further, the risk to the health of those working in the factory, on the site generally and in the surrounding area is far greater given the severity of the diseases, rats for example, can carry.
contd

4. Please tell us your thoughts on the options we have identified for the connection of the Medworth EfW CHP Facility to the electricity grid.

For more information on our proposals for the grid connection please see the Consultation Booklet and Chapter 2 of the PEIR.

Fountain Frozen Limited note that the options and makes no comment over the grid connection. Fountain Frozen Limited supports the concept of recycling wherever possible and would welcome more cost efficient energy from any reasonably acquired source.

5. Instead of waste delivery lorries accessing the site through Weasenham Lane and Algores Way as they currently do, we are proposing to improve New Bridge Lane to enable lorries to access the proposed Medworth EfW CHP Facility from New Bridge Lane. Please can you let us have your thoughts on this proposal in the box below.

Fountain Frozen Limited consider that while redeveloping the New Bridge Lane junction with the A47 would ease traffic flow through Weasenham Lane and Algores Way, the likely vibration problems suffered by our factory by 180 lorries driving passed nearby every day would still be felt. It is anticipated there will need to be effectively an in and out ramp from the tipping hall, one of which would have to drive passed the back of our factory.

The adverse effect on Fountain Frozen Limited, it is considered that to put an active junction from each direction onto the A47 at Newbridge Lane would create a significant traffic hazard. This section of the A47 is a national speed limit piece of road joining two roundabouts. The road would need to be widened to incorporate a turning lane from traffic heading east to west towards Peterborough. Given the size of the vehicles involved the entry to the junction will need to be suitably wide and there would almost certainly need to be a deceleration lane otherwise significant delays would be expected to the traffic flow. As the road is defined as a national trunk road, the risk of heavy goods vehicles turning right from a standing start

contd

6. Community benefits

We are proud to be part of the communities in which we operate. On other projects, we have provided a number of community and environmental benefits and we are keen to understand which benefits you think would be best suited to your area. Of the benefits listed below, please tick up to 5 benefits that are most important to you:

For more information on community benefits please see the Consultation Booklet and Chapter 15 of the PEIR.

- | | | | |
|--|--------------------------|--|--------------------------|
| • Employment of local people | <input type="checkbox"/> | • Skills development for staff and the wider community | <input type="checkbox"/> |
| • Use of local suppliers | <input type="checkbox"/> | • Support to/working with local community groups | <input type="checkbox"/> |
| • A visitor area for schools and community workshops at the facility | <input type="checkbox"/> | • A local liaison group | <input type="checkbox"/> |
| • Hosting site visits for schools and local community groups | <input type="checkbox"/> | • Biodiversity and ecological enhancement | <input type="checkbox"/> |
| • Support for apprenticeships, internships and work experience | <input type="checkbox"/> | • Waste awareness and education | <input type="checkbox"/> |

We would also like to hear about other ideas or initiatives that you consider could benefit your community. Please tell us about these in the box below:

7. General comments

We are keen to hear any further thoughts or ideas that you might have about the Medworth EfW CHP Facility and associated development or this consultation (such as the quality of the documents, website and events). Please tell us about these in the box below:

8. Keeping you informed

How would you like us to keep you informed about the proposed Medworth EfW CHP Facility?

Please tick all relevant options:

- | | | | |
|-------------------------|-------------------------------------|-----------------------|-------------------------------------|
| • By post | <input checked="" type="checkbox"/> | • Email | <input checked="" type="checkbox"/> |
| • A local liaison group | <input type="checkbox"/> | • Text | <input type="checkbox"/> |
| • Website | <input type="checkbox"/> | • I'm not interested* | <input type="checkbox"/> |

Please be advised that we will use the contact details you have provided on this form to keep you informed in your preferred way.

*Please note that we may have a statutory requirement to notify you about the proposed Medworth EfW CHP Facility in the future. Any statutory notification will be sent to you by post.

Return to: FREEPOST MVV



www.mvv-medworthchp.co.uk

Fountain Frozen Limited

Question 1 contd

The Proposed Development would make significant dust problems as well as possible land subsidence. Our factory has two large fryers which cook our processed food at approximately 190 degrees Celsius. We have significant pipework both underground and overground to assist the cooking and chilling process as well as stores of ammonia which are used in our freezers.

Further, the land on which our factory sits is owned by the Trust Fund for our company's pension. Were there to be any reduction or cessation in business due to the proposed development, this would affect not only the people who work for the company as well as its shareholders but also the pensioners who benefit under the pension scheme.

In the short distance between the proposed development and our factory is a small water course. It is noted in 10.4 that there will be no significant effects on the water environment is disputed. The water course in question is relatively small but does provide useful drainage in times of heavy or persistent rain. The proposed development including a pit of approximately 40 metres depth and the ability to hold 17,000 tonnes of waste will undoubtedly affect the water course at least during the construction period.

It is further contended that the dust which is described as having no significant effect at paragraph 6.4 of the Non-Technical Summary is incorrect. Any dust or additional heat will likely have an effect on the air filtration systems and the cooling systems in effect at our factory.

It is also noted the proposed development will involve around 181 extra lorry journeys in each direction. This will undoubtedly have an adverse effect on our delivery and despatch systems particularly in the event of a road closure elsewhere in Wisbech which would lead further traffic along South Brink which is the route our lorries take into and out of the factory. The additional vibration will likely cause damage to the factory, road system and surrounding properties.

Question 2 contd

The inevitable vibration caused by the heavy land works required if the permitted development is allowed to proceed are likely to have adverse effects on the structure of the factory and in particular the pipes which carry gases around to the various processes we use as well as surrounding businesses and homes, not to mention the road system and local school.

At paragraph 13 of the Non-Technical Summary there is reference to socio economic effect which refers to chapter 15 of the PEIR. It is alleged there is no significant socio-economic effects from the construction or operation. This is disputed as if the projected development is allowed to proceed, this could have the effect of closing our business. The consultation feedback report at Table 5.1 states the developer must avoid or minimise impact on operational business interests. If the proposed development goes ahead this could well cause significant impact and possible total failure to an operational business (ours) that has been in existence for many years.

It is also noted that there are no other alternatives sites considered and no reason is given. Additionally the extra traffic estimated 181 lorries coming in and out per day is likely to cause vibration and additional damage to the roadways, local buildings and a school.

On a wider scale the additional lorries and the heavy plant coming and going for a period of 3 years while construction is undertaken and the heavy plant for operational purposes thereafter is likely to have a significant effect on the local roads and make it much more dangerous for residents and workers in the area alike. It should be noted that the top of Algores Road where it joins Weasenhams Lane there is a large secondary school and the additional traffic it would put along those routes will cause a great deal of risk to the pupils.

Fountain Frozen Limited

Questions 3 and 5 contd

Question 3

It is also noted in the bio diversity section of the CEMP that the protection of water courses is to be undertaken. Fountain Frozen Limited submit that the water course between its factory and the proposed development would be severely at risk were the proposed development to be allowed to proceed.

The vibration management plan makes no mention of the potential damage to the road structure and network by the increased number of lorries using them. It is not anticipated that the proposed new road on Newbridge Lane would be operational at the outset of construction, therefore the existing road network would have to accommodate the lorries.

On the whole Fountain Frozen Limited consider that the mitigation plans put forward by the Applicant are woefully inadequate given the very real risks to both Fountain Frozen Limited and the residents and workers in the surrounding area.

Question 5

in the face of potentially oncoming traffic at 60 mph, the risk of this junction being constructed are significant.

While the road is closed for the construction work to take place, it is likely that traffic would be diverted through Wisbech Town Centre or at least along Weasenham Lane and back to the A47 via either Cromwell Road or Elm High Road, both of which have residential communities and shopping centres.

