

Summary with references of Oral presentation by Alan Wheeldon at Open Floor Hearing (OFH2) on Thursday 23rd February at 6:00pm.

Summary

My name is Alan Wheeldon. I am a Scientist and a local resident of 8 years. I am also a member of WisWin a local anti-incinerator group and the Wisbech Town Council working Party against the incinerator. The National Planning Policy for waste states that waste planning authorities should: 'Plan for the disposal of waste and the recovery of mixed municipal waste in line with the proximity principle.' (1)

The principle of 'proximity' is set out in UK Government policy in paragraph 4 of Part 1 of Schedule 1 to the Waste (England and Wales) Regulations 2011 (2). It states that the network of waste disposal installations for recovery of mixed municipal waste collected from private households must enable waste to be disposed of, or be recovered, in one of the nearest appropriate installations, by means of the most appropriate methods and technologies, in order to ensure a high level of protection for the environment and public health.

However, MVV's plans to collect waste as laid out in their Environment statement on Climate, chapter 14, goes completely against the proximity principal. In that, they state waste will be collected from Rutland 71km, Norfolk 91km, Lincolnshire 94km, Leicester City 99km, Northamptonshire 102km, Leicestershire 113km, Central Bedfordshire, Bedford City Council and Luton Borough Council 125km, Hertfordshire 160km, and Thurrock 164km, to be delivered to the Wisbech incinerator site.

The absurdity of this large collection radius is highlighted, as convoys of lorries, travelling daily to Wisbech, will pass several other incinerators on the way, such as Peterborough, Lincoln and Bedford and if the waste was dropped there, would save 37km, 92km and 96km respectively off the total distance travelled from the furthest site. This would certainly reduce the total CO₂e produced from the predicted 11,352.47ktCO₂e associated with the operational phase of the proposed Medworth incinerator.

MVV justify collecting waste from towns so far away because they state that those Waste Producing Authorities will have a predicted shortfall in future residual waste management capacity. (4, 5). However, to reach this conclusion MVV have not, and could not, use the recently published up to

date legislation (6) that came into force on 30th January 2023 which legislates a revised waste target to reduce residual waste on a kg per capita basis by 50% by 2042, from 2019 levels. This target was agreed following consultation with the Department for Environment, Food and Rural Affairs who advised that the total mass of residual waste by the calendar year 2042 does not exceed 287 kilograms per head of population in England, down from the 2019 level, of 574 kg per capita. This 50% reduction will be introduced for all residual Waste routes including,

- (a) waste sent to landfill in the United Kingdom;
- (b) waste put through incineration in the United Kingdom;
- (c) waste used in energy recovery in the United Kingdom;

The MVV incinerator plans to operate for 40 years from 2026-2066. However, the introduction of these new regulations means that for 24 years 2042-2066, (over half the incinerators life span), those Waste Providing Authorities listed by MVV will not have a shortfall in future residual waste management capacity. This can be seen in MVV's own data (3) which states that the shortfall as a percentage of total, in the waste management for all those authorities would only average 11.25%. These figures, for a shortfall in waste management by these authorities will easily be absorbed by the new regulations to reduce residual waste by 50%.

This negates MVV's justification in travelling so far to collect waste for their incinerator and indeed could lead to them having to infringe on the Proximity Principal even more by having to travel further to collect enough waste to reach their 625,000 tonnes per year target.

In light of this new legislation that came into force in January 2023 MVV need to update their figures in their planning application (3) as the authorities that they plan to collect waste from will not have a predicted shortfall in future residual waste management capacity.

1) The National Planning Policy for waste paragraph 152. Ministry of Housing, Communities and Local Government (2014). National Planning Policy for Waste.

2) The Waste (England and Wales Regulations 2011 paragraph 4, Part 1, Schedule 1.

3) Medworth energy from waste volume 6.2 Environmental statement – Climate chapter 14 14-58 table 14.28.

4) ONS (2012). 2011 Census: Population and Household Estimates for the United Kingdom.

5) City Population as mentioned in (3).

(6) The Environmental Targets (Residual Waste) (England) Regulations 2023', the regulations as a Statutory Instrument came into force on 30 January 2023.