Cambridgeshire County Council

ID Number 20033456 and 20032472

Medworth CHP Energy from Waste Combined Heat and Power Facility

Planning Inspectorate Reference: EN010110

Written Summary of Oral Case for Cambridgeshire County Council Open Floor Hearing 2

February 2023

#### Introduction

My name is Cllr Lorna Dupré, and I chair the Environment & Green Investment Committee of Cambridgeshire County Council. It is this committee that is responsible for considering and approving the Council's submissions in response to Nationally Significant Infrastructure Project applications in the Council area which relate to energy and waste projects.

# Size and scale of the application

I need to start by pointing out the obvious, that the scale and impact of this application is of great significance and concern to the residents of Wisbech and of Cambridgeshire more widely.

The proposal states that the facility would generate up to 55 megawatts of electricity using 625,000 tonnes of waste annually, and therefore this application—if granted consent—would operate on a regional or sub regional scale. Its effects would be felt not only by the people of Wisbech but also residents in the wider Fenland area.

Our concerns, as set out in the motion passed by Cambridgeshire's Full Council on 21 July 2020 and in our follow up letter to the Secretary of State for Business, Energy and Industrial Strategy on 4 August 2020, are that incinerators can be wasteful; waste incineration is not a truly renewable source of energy; burning waste produces emissions and often creates fewer employment opportunities than recycling; the world is embracing Zero Waste and Incineration should be seen as a backwards step; and that if this application is approved then Wisbech roads will be heavily affected and Wisbech rail would be under threat.

The technical concerns specific to the Medworth proposal were highlighted in the Relevant Representations submitted by the County Council jointly with Fenland District Council and the key issues that have been highlighted are the impacts relating to climate change, landscape and visual amenity, highways and access, and the need for waste to feed the facility as well as how the proposal aligns with the waste hierarchy.

## Climate change

Cambridgeshire County Council declared a climate emergency in 2019, and the Council's Climate Change & Environment Strategy represents our commitment to deliver urgent action to improve our resilience to the climate change that has already happened as well as the effects which are to come, and to reduce our impact on the natural environment. As a Council we aim to reach Net Zero carbon emissions for Cambridgeshire by 2045.

The scale of the emissions from greenhouse gases attributable to the proposed facility is huge, estimated at over 280,000 tonnes of carbon dioxide per year, or over 11 million tonnes over the 40-year lifetime of the facility. Although the actual emissions could vary a lot depending on the particular composition of the waste, emissions from burning the fossil carbon content of materials such as plastics would be significant. Embodied carbon from construction of the proposed plant is estimated at over 48,000 tonnes. The Council is concerned that carbon capture and storage has not been included in the proposal and that this is probably necessary for the proposal to be compatible with a Net Zero pathway.

## Landscape and Visual Amenity

The Council's landscape consultant reviewed the application, concluding that the construction and operation of the proposed development will have significant visual effects for the properties closest to the site, in particular the residents of 10 Newbridge Lane, as well as the surrounding businesses, homes and schools in the Medworth ward. The built form of the facility, if it is approved and implemented, will be a prominent and ever-present feature from many vantage points in and around the town. The facility and chimneys would become a way marker in the flat fen landscape, visible to residents in the satellite villages surrounding Wisbech and from many approach roads to the town.

#### **Highways and Access**

Construction and decommissioning of the facility will have significant effects, and the operational phase is anticipated to generate 362 vehicle movements per day of which 284 will be heavy goods vehicles. This is a significant amount of additional traffic for the local road network to accommodate and sufficient mitigation is needed to ensure highway safety, in agreement with the Local Highway Authority.

The Wisbech Area Strategy aims to improve the transport network in Wisbech; it includes strategic road schemes along the A47, as well as opportunities to reopen the Wisbech rail link to support sustainable travel. These schemes will need to be considered by the Examining Authority and, crucially, if consent is granted it cannot be allowed to prejudice any of the road or rail schemes proposed in the Strategy.

It is essential that the highway access for the site and associated road improvements on Algores Way and New Bridge Lane, including the signalisation of the Cromwell Road/ New Bridge Lane junction, are able to be secured by means of a S278 agreement.

#### Waste Needs and the Waste Hierarchy

For energy generation to be considered as waste treatment (rather than disposal) it must achieve a minimum level of energy recovery efficiency which requires both heat and power recovery. If the proposed development cannot achieve the required level of energy recovery efficiency, then it will be regarded as a waste disposal operation, and not a recovery operation.

The Council's policy on providing for waste management requires the movement of waste as far up the waste hierarchy as possible and the incineration of waste, whilst an alternative to landfill, does not support a waste management method that will enable us to reach Net Zero.

The proposal does not comply with Policies 3 or 4 of the Minerals and Waste Local Plan and assumes that there is adequate waste available to feed the plant, but this has not been confirmed. The Council is aware that if this project is given consent and the Peterborough Green Energy Project, another energy from waste facility, is also operational then there will not be sufficient waste to feed both facilities, meaning waste will be imported from further afield.

#### Conclusion

I'm grateful for the opportunity to raise our very significant concerns with the

Examining Authority. You will hear much more detail from the Councils' professional teams as the Examination proceeds. Whilst it is for the Examining Authority to weigh up whether the benefits of the scheme are sufficient to overcome these objections, I close by reminding the Examining Authority that the very strong feeling of local people, as reflected through their Councils' motions, is that the scheme ought not to be granted consent.