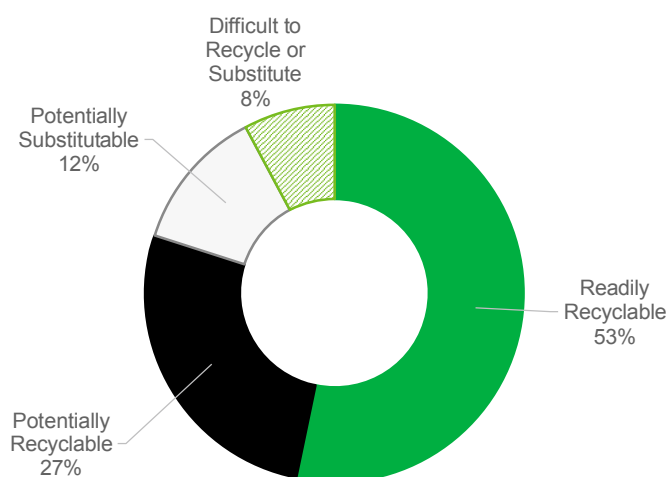


Michael de Whalley – Representation Notes for SH1 Agenda Item 5

Waste arisings are a function of population density. Wisbech is a long way from any such significant concentration of population (see appendix 1) and with the Wash and the North Sea to the North it is difficult to describe it as a centre of gravity for waste arisings in Eastern England. A 2-hour HGV waste radius is an odd interpretation of the proximity principle which states that **waste should be treated as close to its source of origin as possible**. If in the event it could be demonstrated that additional waste treatment capacity is needed (it cannot) then under the proximity principle the facility would be better located further south (or possibly west) in much closer proximity to more densely populated areas (see appendix 2). The applicant claims their proposal would stop waste being exported to the near continent (which it once was from Norfolk but is not now the case) and that this will contribute to meeting proximity requirements which it clearly would have done for Norfolk in the past! At the same time they claim that a 2-hour HGV radius for sourcing waste is within the proximity principle despite this radius cutting across the catchments of a number of existing and proposed incinerators. It is surely not right that planning approval should be sought for a very high capacity plant for Wisbech which could serve to take waste from other incinerators all within an incineration market which achieved national overcapacity in 2019 (ref. UKWIN Overcapacity Briefing). I do not accept that the 600,000 tonne capacity of the plant, its geographical location vis-a-vis centres of population and the proposed 2-hour waste collection radius comply in any way with any reasonable interpretation of the proximity principle.

MVV's case supposedly depends upon moving waste up the hierarchy from landfill to recovery, not competing with existing EfW facilities or for that matter recycling, given that the percentage of residual Municipal Solid Waste sent to incinerators (48.2% in England, 2020/21 - UKWIN) now significantly exceeds the amount being recycled (44.0% in England, 2020/21 - Defra) and is rapidly increasing with every new plant.



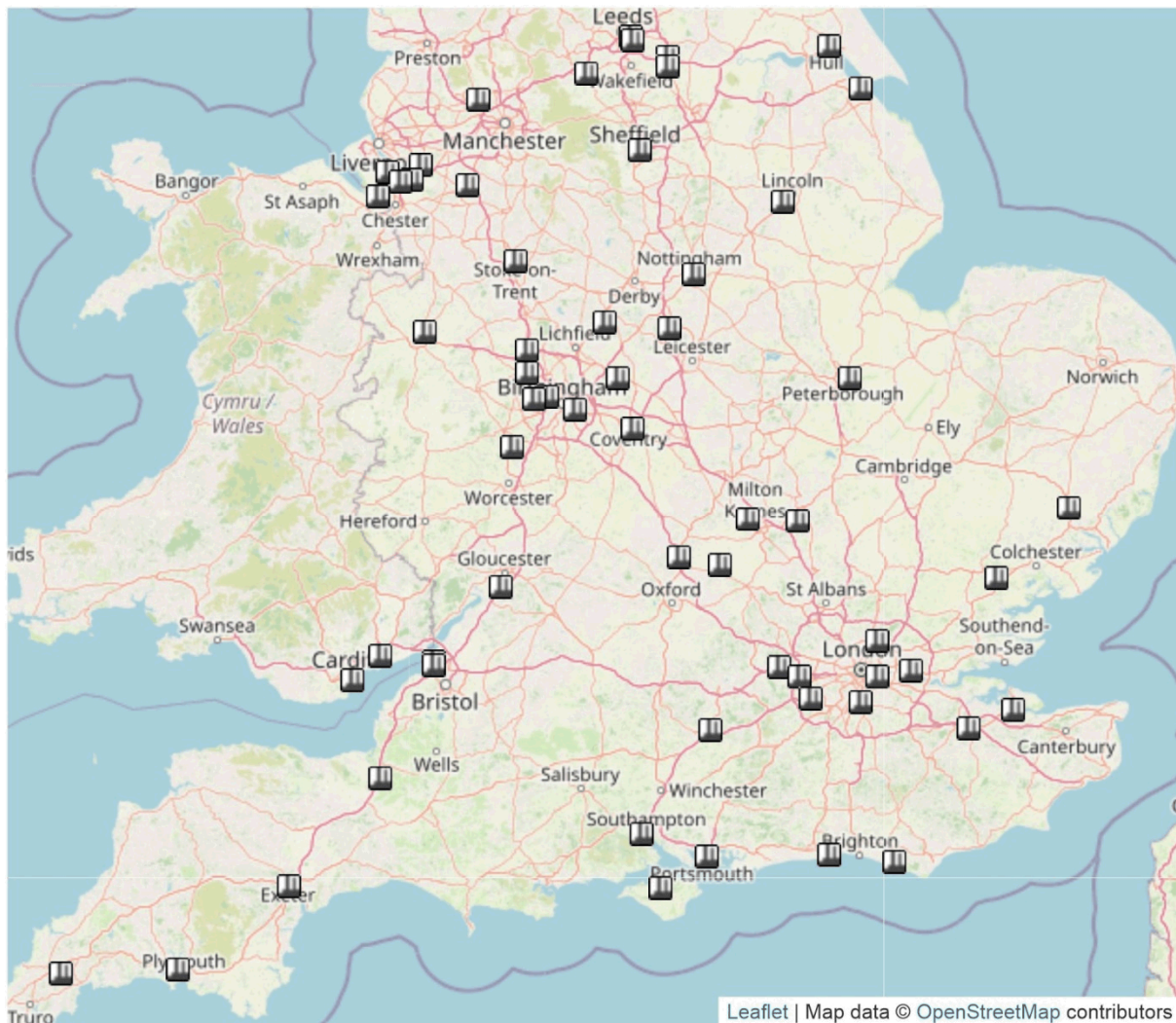
Source: Defra/WRAP (2020) Quantifying the composition of municipal waste

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 current level of incineration has been impinging upon recycling rate improvement since overcapacity was reached in 2019 and has continued to grow! Counties with incinerator contracts have recycling rates well below the UK best because they are having to use recyclables to support their contract commitments. Further it should be noted that waste arisings are not increasing at anywhere near the predicted rate. The waste hierarchy is an inverted pyramid for good reason. The current landfill buffer is also appropriate as it is easier to divert waste away from landfill than long-term incineration/EfW contracts as new and imminent legislation to reduce waste arising and increase recycling becomes active.

Appendix 1

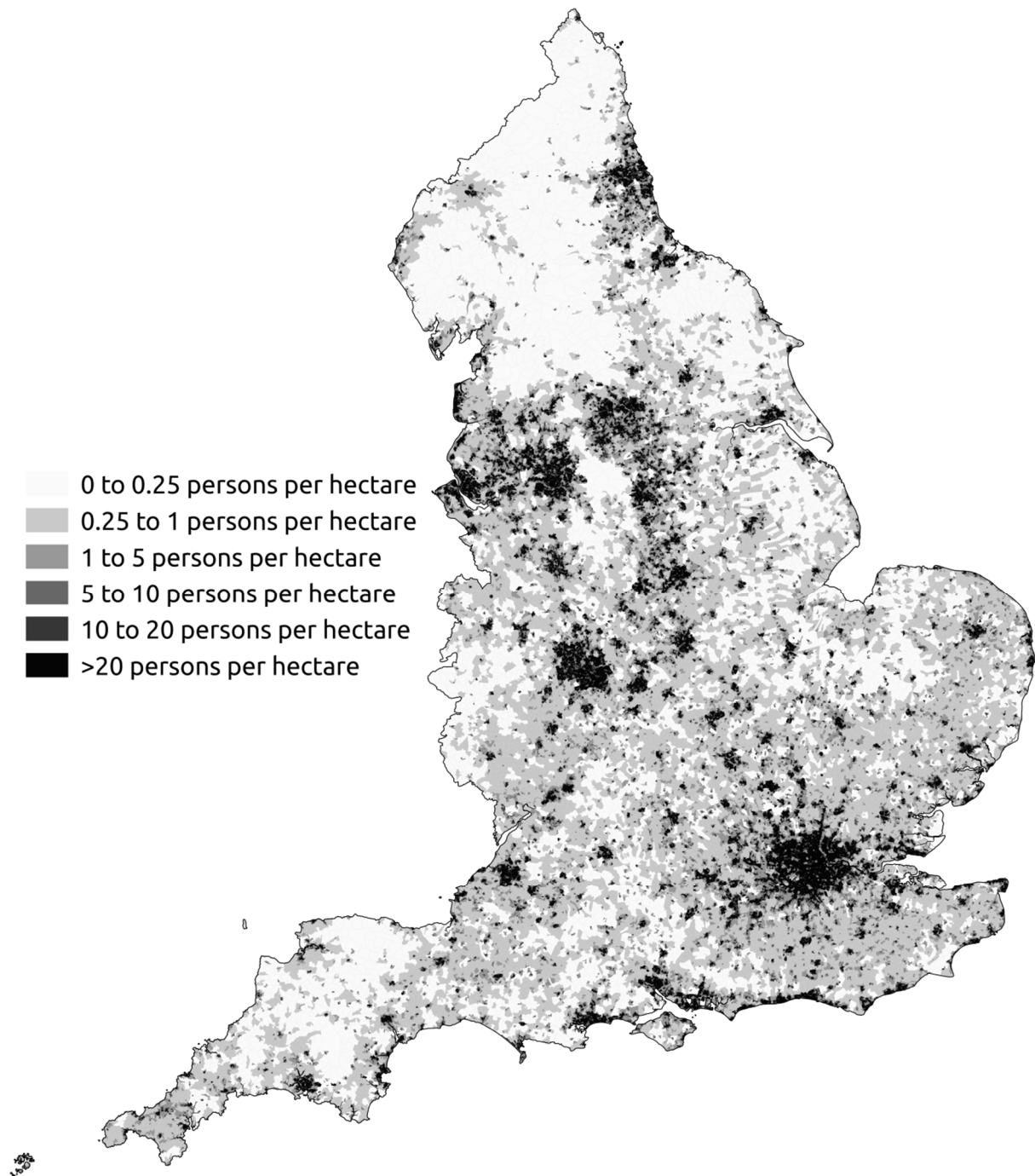
Incinerators in England (part) and Wales.



Source: UKWIN

Appendix 2

Map of population density in England as at the 2011 census.



Source: Wikimedia Commons

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