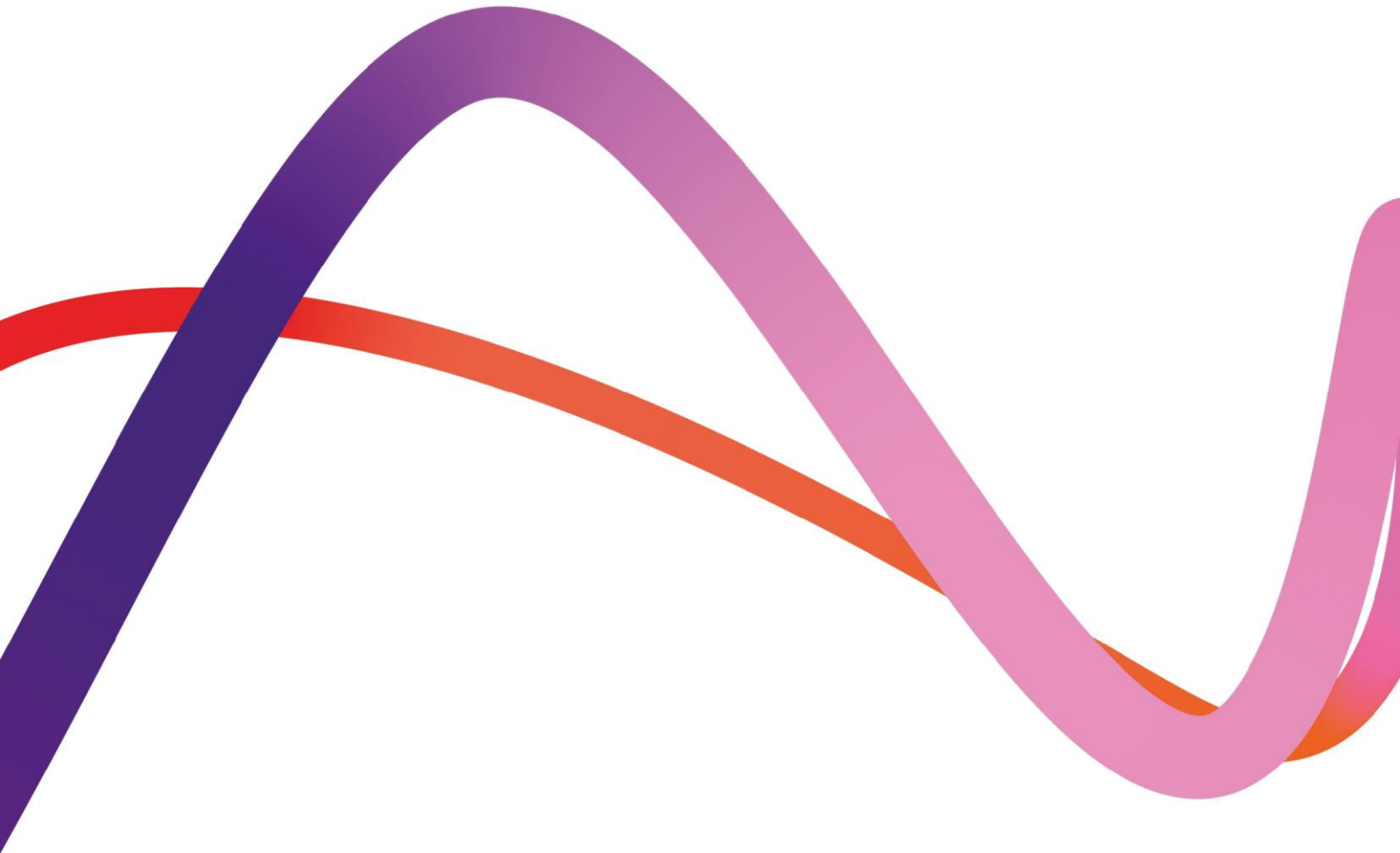


Medworth Energy from Waste Combined Heat and Power Facility



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Applicant's comments on Written Representations: Part 2 – Other Interested Parties

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1. Introduction

1.1 Background

1.1.1 Medworth CHP Limited (the Applicant) submitted an application for development consent to the Secretary of State on 7 July 2022 (the Application). The Application was accepted for examination on 2 August 2022. The Examination of the Application commenced on 21 February 2023.

1.1.2 This document, submitted for Deadline 3 (25 April 2023) of the Examination contains the Applicant's comments on the Written Representations submitted by other Interested Parties at Deadline 2.

1.1.3 The Applicant's comments on the responses are presented in the following tables:

- **Table 2.1:** Comments on the written representations from other Interested Parties;
- **Table 3.1:** Comments on the written representation from Rt Hon Stephen Barclay MP; and
- **Table 4.1:** Comments on the written representation from United Kingdom Without Incineration Network (UKWIN).

1.1.4 The Applicant's comments on the Written Representations submitted by statutory parties are presented separately in the **Applicant's comments on the Written Representations – Part 1 (Volume 11.3)**.



2. Comments on the Written Representation from other Interested Parties

Table 2.1 Comments on the Written Representations from other Interested Parties

ExA ID	Interested Party	Applicant Response
REP2-041	Royal Mail	Comments noted, in particular that Royal Mail is content with the Outline CTMP (Volume 6.4.) [REP1-011] and that Outline CTMP paragraphs 7.4.32 to 7.4.35 reflect Royal Mail's consultation requests and provide Royal Mail with satisfactory advance consultation, liaison and information on works that affect the highway network. Matters raised by Royal Mail shall continue to be addressed in any subsequent revision of the Outline CTMP (Volume 6.4.)(Rev 3) .
REP2-042	Alan Wheeldon	<p><u>Waste need</u></p> <p>The matters raised in relation to waste need are addressed in the Applicant's response to the IP's Relevant Representation RR-633 see Applicant's Comments on the Relevant Representations Part 8 – Other Interested Parties and 3(b) Statutory Parties (Volume 9.2) [REP1-035] and Table 2.1 WFA within Summary of Oral Submissions made by Interested Parties at Open Floor Hearings 1 and 2 and the Applicant's Response (Volume 9.23) [REP1-056]. Of particular note are the IP's comments around the need for the Proposed Development due to recent and impending legislation which it states will dramatically reduce the amount of waste available to burn.</p> <p>An updated version of the WFAA was produced at Deadline 2 – see WFAA (Volume 7.3) [REP2-009]. This provides a clear and robust case of need – and one which is based upon a range of up to date, publicly available, credible and rigorously examined data sources, including new EfW capacity that may come on stream, such as that proposed at Boston. The WFAA has continued to conclude that even with emerging new capacity such as Boston, (which has yet to be consented), 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). The WFAA therefore demonstrates that there is a need for a EfW CHP Facility of circa 625,000 tonnes per annum handling residual waste; that is waste which remains following the removal of recyclable and reuseable waste from the waste stream. The Proposed Development is in accordance with the waste hierarchy in that it would divert residual waste from landfill and to a facility which is designed to extract energy from it.</p>



ExA ID	Interested Party	Applicant Response
		<p>The WFAA (Volume 7.3) [REP2-009] submitted at Deadline 2 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. In particular, the updated WFAA (Volume 7.3) [REP2-009] reflects a municipal recycling rate of 55-60%, future baseline levels of HIC residual waste are estimated to be between 21.0 and 24.5 million tonnes by 2030 – thereby resulting in a shortfall of capacity of between 1.6 and 5.1 million tonnes per annum. The adoption of these recycling scenarios also sits well with the provisions of the recently published Environmental Improvement Plan (EIP) 2023, which seeks the total mass of residual waste not exceeding 25.5 million tonnes by the beginning of 2028. As such, even if residual waste reduction targets are achieved, it is concluded that there remains a minimum national capacity shortfall of 1.6 million tonnes. The Proposed Development would not therefore affect or compromise recycling rates handling the waste that is left over (residual) once waste that can be recycled (or reused) has been removed from the waste stream.</p> <p>Requirement 14 in Schedule 2 of the Draft Development Consent Order (Volume 3.1) (Revision 3 has been produced at Deadline 3) confirms that a scheme must be submitted to the relevant planning authority that sets out how the Applicant will maintain the waste hierarchy and minimise the receipt of recyclable and reusable waste at the EfW CHP Facility.</p> <p><u>Traffic and Transport</u></p> <p>The matters raised by the IP are addressed in the Applicant's response Summary of Oral Submissions made by Interested Parties at Open Floor Hearings 1 and 2 and the Applicant's Response (Volume 9.23) [REP1-056]. See response HT07 regarding the suitability of the local highway network, RE01 regarding the Applicant's support for the reopening of the Disused March to Wisbech Railway and the status of its negotiations with Network Rail and IT02 with regard to the appropriateness of the Applicant's traffic surveys and the agreement provided by CCC. The Applicant's assessment of the effects arising from traffic and Transport are to be found within ES Chapter 6 Traffic and Transport (Volume 6.2) [APP-033] which concludes that they will not be significant.</p>



ExA ID	Interested Party	Applicant Response
		<p><u>Air Quality</u></p> <p>ES Chapter 8: Air Quality (Volume 6.2) [APP-035] presents the air quality modelling. Some of the air quality data has been further updated in Environmental Statement Appendix 8B: Air Quality Technical Report Revision: 3.0 (Volume 6.4) [REP2-006].</p> <p>As detailed in these documents, in order to undertake a robust air quality assessment, five years of ratified meteorological data is required for air dispersion modelling. The dispersion model used five years of hourly sequential meteorological data from the Met Office's Numerical Weather Prediction (NWP) model interpolated for the specific location of the Proposed Development. The meteorological data used in the dispersion modelling accounts for conditions where dispersion is reduced as it includes hours with low wind speeds. The results presented are therefore considered to account for the full range of meteorological conditions expected.</p> <p><u>Climate</u></p> <p>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) (Revision 2.0) [REP2-009] 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 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 changes¹ and the increase in the price of haulage making this disposal route a less financially viable option. Additionally, UK Government policy² 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.</p>

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.



ExA ID	Interested Party	Applicant Response
		<p>The UK Grid Average emissions factor for electricity generation, from DUKES (2021)³, was used in the ES (rather than gas-fired power stations (CCGT)) in response to comments at PEIR stage: “Concern that the assumption that energy generated by the development is only substituting fossil fuels is not consistent with the current energy mix where gas is used to generate only 41% of the electricity used in 2019.” 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 Applicant considers that displacement of electricity generation using conventional fossil fuels is the most likely scenario for the EfW CHP Facility.</p> <p>In response to comments received from CCC and a meeting on 20 October 2022 with representatives from CCC, and King’s Lynn and West Norfolk Council, a Technical Meeting Note (TNCC01) (provided at Appendix 9.2c (Part 9) [REP1-036]) was provided that additionally considered a gradual decarbonisation of the UK electricity grid over time.</p> <p>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: reduced from 2,571 ktCO₂e to 414 ktCO₂e over its lifetime.</p> <p><u>CHP</u></p> <p>The Combined Heat and Power (CHP) Assessment (Volume 7.6) [APP-097] confirms that there are no formal agreements in place for the export of heat from the EfW CHP Facility at this stage. The Applicant continues to engage in discussions with potential consumers located along the CHP Connection Corridor as per the action plan set out in the CHP Assessment.</p> <p><u>Health</u></p> <p>The matters raised by the IP relate to concerns about the release of heavy metals, risk of increased cancer, baseline health conditions in Wisbech (including respiratory disease), concerns about the performance of MVV’s site in Plymouth and that previous statements by PHE have been misrepresented by MVV.</p>

³ BEIS (2021). Digest of UK Energy Statistics (DUKES) 2021.



ExA ID	Interested Party	Applicant Response
		<p>With regards to heavy metals, the majority of heavy metals form particles, or are adsorbed onto the surface of other particulate matter and, consequently, are removed by the fabric filter. As detailed in the Environmental Permit application, heavy metals will be monitored in incinerator bottom ash and air pollution control residues at a frequency of 2 samples per month in the first 12 months then every 3 months thereafter.</p> <p>Unlike the other metals, mercury is present in the flue gases as a vapour. It will be removed from the flue gas through the injection of powdered activated carbon before the dry sorption reactor. In powdered form, the activated carbon provides a large surface area for efficient adsorption of mercury. As detailed in the Environmental Permit application, the Applicant is proposing to monitor mercury emissions using periodic extractive techniques in preference to continuous monitoring. Six, separate (i.e., samples taken on different days) extractive mercury results will be obtained during commissioning or, alternatively, a minimum of two tests per month will be taken until six results are available.</p> <p>The Human Health Risk Assessment (HHRA), ES Appendix 8B: Air Quality Technical Report, Annex G (Volume 6.4) (Revision 3.0) [REP2-006 (clean copy) and REP2-007 (tracked)] considers the potential effects arising from chimney emissions upon humans. The assessment concludes that potential effects are not significant.</p> <p>The UK Health Security Agency (UKHSA) and Office for Health Improvement and Disparities (OHID), the successor bodies to Public Health England (PHE) confirmed by letter dated 14th March 2023 that they are in agreement with the content of the SOCG (see Appendix A of the SOCG [REP2-013], this included agreement that the baseline, assessment methodology and embedded environmental measures set out in Chapter 16 Health of the ES (Volume 6.2) [APP-043] were satisfactory and that the Proposed Development should not result in any significant adverse impact on public health.</p> <p>PHE's response that is referred to in the comments from the IP has been quoted in full when used (ES Appendix 16A: Summary of Consultation Responses [APP-089]).</p> <p><u>Siting</u></p> <p>Matters relating to the siting of the Proposed Development have been raised by other IPs and responded to by the Applicant. For example, see the Applicant's response to RR-034 (Volume 9.2) [REP1-029]. In summary, the Applicant considered a range of site selection criteria when selecting the location of the Proposed Development. This is explained in Section 2.3.1 to 2.3.3 ES Chapter 2 Alternatives (Volume 6.2) [APP-029] and ES Chapter 3 Description of the Proposed Development (Volume 6.2) [APP-030].</p>



ExA ID	Interested Party	Applicant Response
REP2-043	Angela Risebrow	<p>The matters raised by the IP are addressed in the Applicant's response Summary of Oral Submissions made by Interested Parties at Open Floor Hearings 1 and 2 and the Applicant's Response (Volume 9.23) [REP1-056]. See response TR01, IT03 and HT01.</p> <p>In summary, TR01 clarifies the traffic generation for the Proposed Development, confirms how the assessment of traffic impacts was undertaken and reiterates that the assessment concludes that there will be no significant residual effects resulting from the increase in HGV traffic. Mitigation measures relating to traffic management are also provided within ES Chapter 6 Traffic and Transport (Volume 6.2) [APP-033]. IT03 provides information on how the baseline traffic surveys were agreed with Cambridgeshire County Council and National Highways as being reflective of existing conditions. HT01 sets out how construction and operational routing arrangements would be restricted and monitored.</p> <p>The Applicant's assessment of cumulative effects taking account of other Projects is set out in ES Chapter 18 Cumulative Effects Assessment (Volume 6.2) [APP-045]. The methodology adopted to identify projects to include within the assessment is presented in Section 18.4 of the ES Chapter. The approach aligns with PINS Advice Note 17: Cumulative Effects Assessment. The projects screened into the assessment are set out in the Appendices to the main chapter (Volume 6.4) [APP-090].</p>
REP2-045	B Fogarty	<p><u>Waste Need</u></p> <p>The matters raised are addressed in the Applicant's response to the IP's Relevant Representation RR-250 see Applicant's Comments on the Relevant Representations Part 4 – Other Interested Parties and 3(b) Statutory Parties (Volume 9.2) [REP1-031].</p> <p>In summary, the response explains the site selection criteria which was adopted to identify a site for the Proposed Development.</p> <p><u>Planning</u></p> <p>The reason why the Applicant chose the EfW CHP Facility Site is set out within its response to the relevant representation (RR-250). This can be found within Applicant's Comments on the Relevant Representations – Part 4 Other Interested Parties and 3(b) Statutory Parties – Relevant Representations RR-200 – RR299 (Volume 9.2) [REP1-031]. The IP asks whether different areas operate different strategies. At the nationally significant infrastructure level the same national policy applies across England and Wales which for the application is National Policy Statement</p>



ExA ID	Interested Party	Applicant Response
REP2-046	Carla Johnson	<p>EN-1 and National Policy Statements EN-3 and EN-5. The IP also asks whether the 'concentration' of energy NSIPs within the area is unusual, citing a ten mile radius from Walton Highway. The Applicant's inspection of the National Infrastructure Planning project list suggests one energy project within ten miles of the Proposed Development, which is the Palm Paper Mill, Kings Lynn, approved 2016. The majority of energy infrastructure projects within the Eastern region are off-shore wind farms. The Applicant does not believe that the number of energy infrastructure projects, excluding off-shore wind farms is unrepresentative of other regions within England.</p> <p>The Applicant's Planning Statement (Volume 7.1) [APP-091] considers compliance with national policy including both the NPSs and the national Planning Policy Framework (NPPF). It concludes that the planning balance weighs in favour of approval.</p> <p><u>Traffic and Transport</u></p> <p>The matters raised are addressed in the Applicant's response to the IP's Relevant Representation RR-370 see Applicant's Comments on the Relevant Representations Part 5 – Other Interested Parties and 3(b) Statutory Parties (Volume 9.2) [REP1-032].</p> <p>In summary, the environmental impacts of the Proposed Development including HGV traffic associated with construction and operation, have been assessed and reported in ES Chapter 6 Traffic and Transport (Volume 6.2), [APP-033] accompanied by Appendix 6B Transport Assessment (TA) (Volume 6.4) [APP-073]. The Proposed Development also includes for improvements to New Bridge Lane which include for widening, a footpath, pedestrian crossing points and reducing the road speed from the national speed limit to 30mph. Embedded mitigation would be delivered via a suite of management plans, including the Construction Traffic Management Plan (CTMP) (Volume 6.4) (Rev 3)– secured by Requirement 11, Draft DCO (Volume 3.1) (Rev 3), Operational Traffic Management Plan (OTMP) (Volume 7.15) (Rev 3) including route restrictions to reduce impacts to Wisbech Town and surrounding villages – secured by Requirement 12, Draft DCO (Volume 3.1) (Rev 3) and an Operational Travel Plan (Volume 6.4) [APP-074] – secured by Requirement 15, Draft DCO (Volume 3.1) (Rev 3). The CTMP also sets out the process of surveying and repairing any damage made to the highway as a result of the construction works. The assessment concludes that there will be no significant residual effects resulting from the increase in HGV traffic.</p>



ExA ID	Interested Party	Applicant Response
		<p><u>Hydrology</u></p> <p>The Flood Risk Assessment (Volume 6.4 of Appendix 12A of the ES) [APP-084] assessed flood risk at the Proposed Development site using the latest Environment Agency flood modelling for the area (2011 Nene Tidal Hazard mapping). This indicates that the Proposed Development will remain entirely dry during the design flood event (overtopping of the Nene flood defences plus climate change) but is at residual risk of flooding (breach of the Nene flood defences plus climate change and/or a particularly severe overtopping event in excess of the design flood). The proposed embedded environmental measures to address the residual risk of flooding of the Proposed Development are set out in Table 12.10 of Chapter 12: Hydrology (Volume 6.2 of the Environmental Statement (ES) [APP-039] and were agreed with the Environment Agency through extensive consultation during pre-application (details provided in Appendix 12B of the ES (Stakeholder Engagement) of the ES (Volume 6.2) [APP-085] and the Environment Agency SoCG (Volume 9.7) (Rev 2)). Design measures include raising the ground level of sensitive infrastructure to a level at or above the modelled flood level for the breach of the Nene flood defences at the 1 in 1000 year plus climate change flood event. The impacts of climate change were assessed in line with the current National Guidance (Flood risk assessments: climate change allowances updated July 2020). The Proposed Development, with the identified flood risk management measures in place, would not be subject to an unacceptable level of flood risk, nor would it increase flood risk elsewhere. It would also not result in any loss of functional floodplain storage or impede water flows.</p> <p>A water quality monitoring programme for the discharge of uncontaminated surface water runoff from the Proposed Development into the local drains will be implemented during construction and operation phases to ensure that the measures taken to protect the surface water environment are effective. Details of the water quality monitoring programme will be developed and agreed with the Environment Agency. The water quality monitoring programme for the construction phase will be agreed before construction at detailed design and will be set out in the Construction Environmental Management Plan (in line with Rev 3 of the Outline Construction Environmental Management Plan (Volume 7.12) (Rev 3)) sections 3.5.1 to 3.5.4, which is secured in Requirement 10 of the draft DCO (Volume 3.1) (Rev 3). The water quality monitoring programme for the operational phase will be agreed at detailed design and will be secured as part of the Environmental Permitting process.</p> <p><u>Air Quality</u></p> <p>The environmental impacts of the Proposed Development including air quality have been assessed. ES Chapter 8: Air Quality (Volume 6.2) [APP-035] includes detailed dispersion modelling from the chimney and includes traffic modelling of HGVs during construction and operation, to predict potential impacts on human and ecological receptors. PM_{2.5} is one of the pollutants assessed. The emission concentrations used in the dispersion modelling are presented in Table 8B4.2</p>



ExA ID	Interested Party	Applicant Response
		<p>of Environmental Statement Appendix 8B: Air Quality Technical Report Revision: 3.0 (Volume 6.4) [REP2-006]. This Appendix was updated for Deadline 2, but Table 8B4.2 has remained unchanged since original publication.</p> <p><u>Health</u></p> <p>The matters raised are addressed in the Applicant's response to the IP's Relevant Representation RR-370 see Applicant's Comments on the Relevant Representations Part 5 – Other Interested Parties and 3(b) Statutory Parties (Volume 9.2) [REP1-032].</p> <p>In summary, the assessment of health is presented in ES Chapter 16 Health (Volume 6.2) [APP-043]. A range of mitigation measures embedded into the draft DCO (Volume 3.1) (Rev 3) and Environmental Permit will ensure no significant adverse health effects.</p> <p><u>Adequacy of consultation</u></p> <p>In response to the concerns regarding the adequacy of consultation, the Applicant has confirmed that the necessary information was provided in accordance with the requirements of the Planning Act 2008 and associated regulations (including the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 and the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017. Having reviewed the matter of the adequacy of consultation, PINS accepted the DCO Application for the Proposed Development for Examination, see Notification of Decision to Accept Application [PD-001]. Full details of the Applications statutory and non-statutory pre-application consultation are reported in the Consultation Report (Volume 5.1) [APP-018] and the accompanying appendices.</p>
REP2-047	Clive Landa	<p><u>Agricultural land and soil conditions</u></p> <p>The matters raised in relation to the impact on agricultural production and soil conditions have been raised by other IPs and responded to by the Applicant. For example, see the Applicant's response to RR-031 (Volume 9.2) [REP1-029].</p> <p>In summary, the site of the proposed EfW CHP Facility is currently occupied by a waste transfer station and aggregate recycling centre whilst the proposed CHP and Grid Connection follow a disused railway and highway(s) respectively. The Proposed Development does not directly affect agricultural land and no best and most versatile land is affected. ES Chapter 13 Geology, Hydrogeology and Contaminated Land (Volume 6.2) [APP-040] provides further detail. With regard to the potential for contamination, either by air or by water, the Applicant has prepared an Outline Construction Environmental Management Plan (Volume 7.12) [Rev3] which has been updated and will be submitted at Deadline</p>



ExA ID	Interested Party	Applicant Response
		<p>3. This set out the measures to be adopted to manage and prevent pollution to adjoining land, including agricultural land alongside the A47.</p> <p><u>Air Quality</u> The Applicant has responded to concerns raised in relation to Air Quality within their response to the relevant representations. For example, see the Applicant's response to RR-031 (Volume 9.2) [REP1-029].</p> <p>In summary, the environmental impacts of the Proposed Development including air quality have been assessed. ES Chapter 8: Air Quality (Volume 6.2) [APP-035] includes detailed dispersion modelling from the chimney and includes traffic modelling of HGVs during construction and operation, to predict potential impacts on human and ecological receptors. The air quality assessment was undertaken considering air quality objectives for a series of pollutants including metals and particulate matter (PM), set for the protection of human health and ecological sites and concludes that effects are not significant.</p> <p>All EfW facilities in England require an Environmental Permit (EP) from the Environment Agency to operate. The EP has been submitted and will set the emission limits for the facility and requires an operator to continuously monitor the emissions and submit results to the EA.</p> <p><u>Waste Need</u> The matters raised in relation to waste availability and need have been raised by other IPs and responded to by the Applicant. For example, see the Applicant's response to RR-006 (Volume 9.2) [REP1-029]. In summary, the Waste Fuel Availability Assessment (Volume 7.3) (Revision 2.0) [REP2-009] considers the availability of waste in the context of local and national need.</p> <p>The assertion that the Proposed Development may not produce 50 megawatts (MW) of electricity has been raised by other IPs and responded to by the Applicant. For example, see the Applicant's response to RR-296 (Volume 9.2) [REP1-031]. In summary, this response explains that the amount of residual waste to be processed at the EfW CHP Facility will generate in excess of 50MW of electricity. As a generating station with an electrical capacity exceeding 50MW, it is classified as a Nationally Significant Infrastructure Project under section 15 of the Planning Act 2008, and it requires development consent under the 2008 Act.</p>



ExA ID	Interested Party	Applicant Response
		<p><u>Traffic and Transport</u></p> <p>The concerns raised in relation to HGV movements and the impact on road infrastructure have been raised by other IPs and responded to by the Applicant. For example, see the Applicant's response to RR-006 (Volume 9.2) [REP1-029].</p> <p>In summary, the environmental impacts of the Proposed Development including HGV traffic associated with construction and operation, have been assessed and reported in ES Chapter 6 Traffic and Transport (Volume 6.2), [APP-033] accompanied by Appendix 6B Transport Assessment (TA) (Volume 6.4) [APP-073]. The Proposed Development also includes for improvements to New Bridge Lane which include for widening, a footpath, pedestrian crossing points and reducing the road speed from the national speed limit to 30mph. Embedded mitigation would be delivered via a suite of management plans, including the Construction Traffic Management Plan (CTMP) (Volume 6.4) [REP1-011] – secured by Requirement 11, Draft DCO (Volume 3.1) (Rev 3), Operational Traffic Management Plan (OTMP) (Volume 7.15) (Rev 3) including route restrictions to reduce impacts to Wisbech Town and surrounding villages – secured by Requirement 12, Draft DCO (Volume 3.1) (Rev 3) and an Operational Travel Plan (Volume 6.4) [APP-074] – secured by Requirement 15, Draft DCO (Volume 3.1)(Rev 3). The CTMP also sets out the process of surveying and repairing any damage made to the highway as a result of the construction works. The assessment concludes that there will be no significant residual effects resulting from the HGV traffic generated by the Proposed Development.</p> <p>The matters raised by the IP in relation to the impact on roads during the summer season are addressed in the Applicant's response Summary of Oral Submissions made by Interested Parties at Open Floor Hearings 1 and 2 and the Applicant's Response (Volume 9.23) [REP1-056]. See response HT07 which outlines the mitigation measures that would be implemented to manage the impacts.</p> <p><u>Health</u></p> <p>The concerns relating to pollution, particularly on schools and other sensitive receptors have been raised by other IPs and responded to by the Applicant. For example, see the Applicant's response to RR-026 and RR-033 (Volume 9.2) [REP1-029].</p> <p>In summary, the assessment of health is presented in ES Chapter 16 Health (Volume 6.2) [APP-043]. A range of mitigation measures embedded into the draft DCO [REP1-007] and Environmental Permit will ensure no significant adverse health effects.</p>



ExA ID	Interested Party	Applicant Response
		<p><u>Socio-economics</u></p> <p>The concerns relating to potential socio-economic effects on local residents and businesses, have been raised by other IPs and responded to by the Applicant. For example, see the Applicant's response to RR-035 (Volume 9.2) [REP1-029].</p> <p>In summary, the impacts have been assessed and reported in the ES and summarised in the Non-Technical Summary (Volume 6.1) [APP-027]. ES Chapter 15: Socio-Economics, Tourism, Recreation and Land Use (Volume 6.2) [APP-042] concludes that there will not be significant negative effects.</p> <p>With reference to the potential for effects upon the proposed Wisbech Garden Town, this proposal was considered within the cumulative effects assessment reported within ES Chapter 18 Cumulative Effects (Volume 6.2) [APP-045]. It was short-listed as ID55. The assessment concluded that effects would not be significant.</p> <p><u>Landscape</u></p> <p>The matters raised in relation to the impact on landscape, particularly the Fens, have been raised by other IPs and responded to by the Applicant. For example, see the Applicant's response to RR-032 (Volume 9.2) [REP1-029].</p> <p>In summary, the LVIA assessed the effects of the Proposed Development on 19 local landscape character areas/types all of which lie within NCA 46 - The Fens. The assessment concluded that there would be the potential for locally significant effects within the Wisbech Settled Fen LCA closest to the EfW CHP Facility. No other significant landscape effects were identified as reported in paragraphs 9.9.2 to 9.2.20 of ES Chapter 9 Landscape and Visual (Volume 6.2) [APP-036].</p> <p><u>Odour</u></p> <p>The matters raised in relation to potential odour have been raised by other IPs and responded to by the Applicant. For example, see the Applicant's response to RR-079 (Volume 9.2) [REP1-029].</p> <p>In summary, the environmental impacts of the Proposed Development including those that could affect the local community, such as odour, have been assessed and reported in the ES and summarised in the Non-Technical Summary (Volume 6.1) [APP-027]. The Applicant has prepared an Outline Odour Management Plan (Volume 7.11) (Revision 2.0) [REP1-021-112], secured in Requirement 16 of the Draft DCO (Volume 3.1) (Rev 3) which details all sources of odour, control measures, monitoring, including a complaints procedure, and reporting.</p>



ExA ID	Interested Party	Applicant Response
		<p><u>Construction</u></p> <p>The impact of construction activities, including in relation to noise, health and socio-economics has been raised by other IPs and responded to by the Applicant. For example, see the Applicant's response to RR-036 (Volume 9.2) [REP1-029]. In summary, ES Chapter 15: Socio-economics, Tourism, Recreation and Land Use (Volume 6.2) [APP-042] considers the effects on the construction phase, including worker accommodation, and the impact on the housing market during construction. The assessment concludes that there will be no negative significant effects. ES Chapter 16 Health (Volume 6.2) [APP-043] also considers the effects during the construction phase and concludes that there would be no significant effects.</p> <p><u>Biodiversity</u></p> <p>The matters raised in relation to impacts on biodiversity have been raised by other IPs and responded to by the Applicant. For example, see the Applicant's response to RR-082 (Volume 9.2) [REP1-029].</p> <p>In summary, ES Chapter 11: Biodiversity (Volume 6.2) [AS-008] provides an assessment of effects on the natural environment including protected sites, habitats and species. No potential negative significant effects have been identified. Mitigation would be secured via the Outline Landscape and Ecology Management Strategy (Figure 3.14) (Volume 6.3) [APP-049] and the Landscape and Ecology Management Plan (Volume 7.7) (Rev 2) secured by Requirement 5, Schedule 2, Draft DCO (Volume 3.1) (Rev 3). The Applicant is also committed to biodiversity net gain and has prepared a strategy which is updated and submitted at Deadline 3 (ES Chapter 11 Biodiversity Appendix 11M, Volume 6.4 (Rev3)). This states that the Applicant will achieve a minimum 10% net gain. This commitment is secured by the Draft DCO (Volume 3.1) Rev3 submitted also at Deadline 3.</p> <p><u>Flooding</u></p> <p>The matters raised in relation to flooding have been raised by other IPs and responded to by the Applicant. For example, see the Applicant's response to RR-092 (Volume 9.2) [REP1-029].</p> <p>In summary, the environmental impacts of the Proposed Development including those associated with flooding have been assessed and reported in ES Chapter 12 Hydrology (Volume 6.2) [APP-039] and the Flood Risk Assessment (FRA) in Appendix 12A (Volume 6.4) [APP-084]. The Applicant has confirmed that mitigation measures are incorporated into the Outline Construction Environmental Management Plan (Volume 7.12)(Rev 3), Outline Operational Flood Emergency Management Plan (Volume 7.9) [REP-019] and Outline Drainage Strategy (Volume 6.4) [REP1-017], secured via requirements 10, 13 and 8 of the draft DCO (Volume 3.1) (Rev 3) respectively.</p>



ExA ID	Interested Party	Applicant Response
REP2-048	David Hammond	<p><u>Air Quality</u> The matters raised in relation to air quality and health are addressed in the Applicant's response to the IP's Relevant Representation RR-309 see Applicant's Comments on the Relevant Representations Part 5 – Other Interested Parties and 3(b) Statutory Parties (Volume 9.2) [REP1-032].</p> <p>In summary, the environmental impacts of the Proposed Development including air quality have been assessed. ES Chapter 8: Air Quality (Volume 6.2) [APP-035] includes detailed dispersion modelling of emissions from the chimney and road traffic (including HGVs during construction and operation), to predict potential impacts on human and ecological receptors. The air quality assessment was undertaken considering air quality objectives for a series of pollutants including metals and particulate matter (including PM_{2.5}, the smallest fraction of particulate matter for which there are objectives against which impacts can be assessed), set for the protection of human health and ecological sites and concludes that effects are not significant.</p> <p><u>Biodiversity</u> Concerns about the impact on biodiversity on land and water have been raised by other IPs, for example, see the Applicant's response to RR-082 (Volume 9.2) [REP1-029].</p> <p>In summary, ES Chapter 11: Biodiversity (Volume 6.2) [AS-008] provides an assessment of effects on the natural environment including protected sites, habitats and species. No potential negative significant effects have been identified. Mitigation would be secured via the Outline Landscape and Ecology Management Plan (Figure 3.14) (Volume 6.3) [APP-049] and the Landscape and Ecology Management Plan (Volume 7.7) (Rev 2) secured by Requirement 5, Schedule 2, Draft DCO (Volume 3.1) (Rev 3).</p>
REP2-049	Dr Ursula Waverley	<p><u>Air Quality</u> The Applicant has responded to concerns raised in relation to Air Quality within their response to the relevant representations. For example, see the Applicant's response to RR-031 (Volume 9.2) [REP1-029].</p> <p>In summary, the environmental impacts of the Proposed Development including air quality have been assessed. ES Chapter 8: Air Quality (Volume 6.2) [APP-035] includes detailed dispersion modelling from the chimney and includes traffic modelling of HGVs during construction and operation, to predict potential impacts on human and ecological receptors. The air quality assessment was undertaken considering air quality objectives for a series of pollutants including metals and particulate matter (PM), set for the protection of human health and ecological sites and concludes</p>



ExA ID	Interested Party	Applicant Response
		<p>that effects on sensitive receptors, including the eye hospital are not significant. The assessment takes account of embedded mitigation measures secured in the draft DCO [REP1-007] as described in the Applicant's response to RR-031 (Volume 9.2) [REP1-029].</p> <p>All EfW facilities in England require an Environmental Permit (EP) from the Environment Agency to operate. The EP has been submitted and the Applicant has been informed by the Environment Agency that it was duly made on 23 March 2023. 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.</p> <p><u>Capacity</u> The assertion that the Proposed Development will not produce 50MW of electricity has been raised by other IPs and responded to by the Applicant. For example, see the Applicant's response to RR-296 (Volume 9.2) [REP1-031].</p> <p><u>Climate</u> Concerns relating to climate change have been raised by other IPs and responded to by the Applicant. For example, see the Applicant's response to RR-032 Applicant's Comments on the Relevant Representations Part 2 – Other Interested Parties and 3(b) Statutory Parties (Volume 9.2) [REP1-029]. In summary, the assessment described in ES Chapter 14: Climate Change (Volume 6.2) [APP-041] Section 14.9 concludes that the Proposed Development would reduce GHG emissions, which will support the UK Government in meeting its carbon budgets/targets.</p> <p><u>Alternatives and site selection</u> Matters relating to the siting of the Proposed Development have been raised by other IPs and responded to by the Applicant. For example, see the Applicant's response RR-034 (Volume 9.2) [REP1-029]. In summary, the Applicant considered a range of site selection criteria when selecting the location of the Proposed Development. This is explained in Section 2.3.1 to 2.3.3 ES Chapter 2 Alternatives (Volume 6.2) [APP-029] and ES Chapter 3 (Volume 6.2) [APP-030].</p>



ExA ID	Interested Party	Applicant Response
		<p data-bbox="607 371 752 395"><u>Waste Need</u></p> <p data-bbox="607 435 1998 643">An updated version of the WFAA was produced at Deadline 2 – see WFAA (Volume 7.3) [REP2-009]. This provides a clear and robust case of need – and one which is based upon a range of up to date, publicly available, credible and rigorously examined data sources. This has continued to conclude that there is insufficient existing or planned residual waste management capacity to ensure that residual 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). The WFAA (Rev 2) demonstrates that the project would not result in an overcapacity of waste management at either a local or a national level.</p> <p data-bbox="607 679 1998 799">The focus of the Applicant's assessment is on the diversion of non-recyclable residual waste from being managed at the bottom of the waste hierarchy in landfill. The Proposed Development would not divert waste from any means of management than from landfill or exportation (which are both covered in some detail in the WFAA (Volume 7.3) [REP2-009]), due to the scope of its Environmental Permit limiting the waste that can be accepted by the EfW Facility.</p> <p data-bbox="607 836 1554 860">The updated WFAA (Volume 7.3) [REP2-009] concludes that at a national level:</p> <ul data-bbox="651 868 1998 1075" style="list-style-type: none"> <li data-bbox="651 868 1998 924">• In 2021, ~9.95 million tonnes of residual HIC waste was disposed of to landfill, and 1.7 million tonnes was exported as refuse derived fuel (RDF) to Europe and beyond; and <li data-bbox="651 963 1998 1075">• 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 ~1.6 million tonnes of residual HIC capacity in the UK (rising to over 5 million tonnes if the Government's recycling target is undershot by 5%). <p data-bbox="607 1115 1998 1267">Furthermore, at a more localised level, the updated WFAA (Volume 7.3) [REP2-009] concludes that based upon the current pattern of waste arising and management across the spatial scope of the assessment, there is potential for around 2.6 million tonnes of material to be managed further up the waste hierarchy and/or at a location that is more proximate to the point of arising. Looking ahead to the position up to around 2035 it is estimated that there will be a gap in residual waste management capacity of at least ~1.3 million tonnes per annum.</p> <p data-bbox="607 1302 1998 1358">In this context, the Proposed Development could offer up to 625,600 tonnes per annum of much needed national and local residual waste management capacity.</p>



ExA ID	Interested Party	Applicant Response
		<p><u>Planning</u></p> <p>The amount of residual waste to be processed at the EfW CHP Facility will generate in excess of 50 megawatts of electricity. The Proposed Development will have an electrical capacity in excess of 50MW and is therefore classed as a Nationally Significant Infrastructure Project under the Planning Act 2008, and it requires development consent from the Secretary of State under the 2008 Act.</p> <p>The Written Representation provides commentary on the BEIS Energy White Paper. The Applicant presumes that this refers to 'Powering our Net Zero Future' December 2020. The Proposed Development is supportive of the government's objective of net zero. ES Chapter 14 Climate (Volume 6.2) [APP-041] demonstrates that it would reduce the emission of greenhouse gases over a 'do nothing' situation of continued landfill. The Proposed Development would also be a reliable source of energy consistent with the aims of the White Paper. The Applicant has also set aside land for carbon capture and ensured that the EfW CHP Facility is carbon capture-ready. The Draft DCO (Volume 3.1) (Rev 3) includes Requirements 22 and 23 which require the retention of the carbon capture reserve space and the preparation of a regular report into the viability of carbon capture.</p> <p><u>Agricultural Land – food production</u></p> <p>Matters relating to the impact on food production on nearby agricultural land have been raised by other IPs and responded to by the Applicant. For example, see the Applicant's response RR-005 (Volume 9.2) [REP1-029]. In summary, a Human Health Risk Assessment (HHRA), ES Appendix 8B: Air Quality Technical Report, Annex G (Volume 6.4) (Revision 3) [REP2-006] has been prepared which considers the potential effects arising from chimney emissions upon humans. The Assessment assumes that the receptors would eat food grown in the local area and considers potential impacts from the bioaccumulation of, for example, polychlorinated dibenzofurans (PCDD/Fs) and dioxin-like PCBs in the food chain. The assessment concludes that potential effects are not significant.</p> <p><u>Biodiversity</u></p> <p>ES Chapter 11: Biodiversity (Volume 6.2) [AS-008] provides an assessment of effects on the natural environment including protected sites in the Wash area and the River Nene. No potential negative significant effects have been identified. Mitigation would be secured via the Outline Landscape and Ecology Management Plan (Figure 3.14) (Volume 6.3) [APP-049] and the Landscape and Ecology Management Plan (Volume 7.7) (Rev 2) secured by Requirement 5, Schedule 2, Draft DCO (Volume 3.1) (Rev 3).</p>



ExA ID	Interested Party	Applicant Response
		<p><u>Dust</u> The IP does not provide references for the quoted text. However, it appears to be an extract from a document setting out potential issues and concerns around dust rather than confirming a position of a recognised dust problem during construction and operation of an unnamed facility.</p> <p>ES Chapter 8: Air Quality (Volume 6.2) [APP-035] considers the impacts associated with dust during construction and operation of the Proposed Development.</p> <p><u>Mr Carey's Performance</u> The Applicant disagrees with the sentiments expressed by the IP.</p> <p><u>Dundee (unnamed source)</u> The IP does not provide references for this article. However, the Applicant believes this relates to an ENDS article published on 31 August 2000. At this time Dundee Energy Recycling (DERL) were the operating company. MVV were not involved in operating an EfW facility in Dundee until late 2017.</p> <p><u>Site Selection</u> Matters relating to the siting of the Proposed Development have been raised by other IPs and responded to by the Applicant. For example, see the Applicant's response RR-034 (Volume 9.2) [REP1-029].</p> <p><u>Major Accidents and Disasters</u> An assessment of the potential for major accidents and disasters is presented in ES Chapter 17 Major Accidents and Disasters (Volume 6.2) [APP-044]. The assessment considers the potential for incidents at the EfW CHP Facility, and determines that there would be no significant effects. An outline Fire Prevention Plan (Volume 7.10) [REP2-011] has been produced and is secured in Requirement 17 of the draft DCO (Volume 3.1) (Rev 3). The operating techniques required under the Environmental Permit will ensure that the facility can be shut down safely during planned and un-planned shutdowns.</p> <p><u>Socio-economic</u> The Applicant has prepared an Outline Employment and Skills Strategy (Volume 7.8) [APP-099], secured in Requirement 21 of the draft DCO (Volume 3.1) (Rev 3) which outlines measures to secure local employment.</p>



ExA ID	Interested Party	Applicant Response
		<p>The impacts on employment, tourism and local businesses have been assessed and reported in the ES and summarised in the Non-Technical Summary (Volume 6.1) [APP-027]. ES Chapter 15: Socio-Economics, Tourism, Recreation and Land Use (Volume 6.2) [APP-042] concludes that there will significant beneficial effects on employment, and no significant negative effects on tourism or local businesses.</p> <p><u>Traffic and Transport</u></p> <p>In relation to traffic surveys and modelling, response IT03 in the Applicant's response Summary of Oral Submissions made by Interested Parties at Open Floor Hearings 1 and 2 and the Applicant's Response (Volume 9.23) [REP1-056] provides information on how the baseline traffic surveys were agreed with Cambridgeshire County Council and National Highways. The approach to the assessment was agreed with the relevant highways authorities, as documented in Appendix 6D Stakeholder Consultation in ES Chapter 6 Traffic and Transport (Volume 6.4) [APP-075].</p> <p>The matters raised in relation to relationship between the Proposed Development and the potential reopening of the disused March to Wisbech Railway have been raised by other IPs and responded to by the Applicant. For example, see the Applicant's response to RR-028 (Volume 9.2) [REP1-029].</p> <p>In summary, the Applicant has reiterated support for the reopening of the railway and is of the view that the Proposed Development will not compromise this aim. This is illustrated on Figure 3.17 of ES Chapter 3 Description of the Proposed Development Figures (Volume 6.3) [APP-049].</p> <p><u>Hydrology</u></p> <p>A description of waste water disposal is provided in ES Chapter 3: Description of the Proposed Development (Volume 6.2) [APP-030] under 'utilities and other infrastructure.' This includes wastewater from the sanitary and domestic facilities and, occasionally, process wastewater from the EfW CHP Facility. Treatment and water quality testing will be provided prior to discharge to foul sewer to ensure compliance with the requirements of an Anglian Water trade effluent discharge consent for the EfW CHP Facility. The Applicant has discussed and agreed the approach with Anglian Water, as reflected in Appendix 12B Stakeholder engagement (Volume 6.4) to Chapter 12: Hydrology (Volume 6.2).</p> <p>With regards to water use and risks to local water supplies, it is noted that the water demand of the EfW CHP Facility appears high because it allows for the full 63t/h CHP steam supply with zero condensate return as a worst-case scenario.</p>



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		<p>In typical operating conditions without any CHP steam supply, the water demand is significantly lower, in the approximate range of 2.5t/h to 5t/h, and there is limited demand for reuse of rainwater in the process. Furthermore, it should be noted that any increased demand due to CHP steam supply is likely to be met by an equal reduction in water demand from the receiving CHP steam customer, i.e., the net increase in local water demand due to CHP steam supply is likely to be zero.</p> <p>The proposed embedded environmental measures to prevent water pollution and pollution incidents affecting local water supplies are set out in Table 12.10 of ES Chapter 12 Hydrology (Volume 6.2) [APP-039]. These measures include implementing good working practices and adherence to the Outline Construction Environmental Management Plan (Volume 7.12) (Rev 3) submitted at Deadline 3, secured in Requirement 10 of the Draft DCO (Volume 3.1) (Rev 3) submitted at Deadline 3. In addition, specific measures have been embedded into the Proposed Development including:</p> <ul style="list-style-type: none"> • a minimum stand-off distance between the works and the edge of the Hundred of Wisbech Internal Drainage Board drains; • the provision of oil interceptors and trapped gullies; • appropriate storage of chemicals, fuel and oil including implementation of an accident response protocol; • development of a detailed Drainage Management Plan and Drainage Strategy (on the basis of the Outline Drainage Strategy (Volume 6.4) [REP1-017]), secured in Requirement 8 of the Draft DCO (Volume 3.1) (Rev 3) submitted at Deadline 3; • implementation of a water quality monitoring programme; and • the development and implementation of a Materials Management Plan as part of the Outline Construction Environmental Management Plan (Volume 7.12) (Rev 3) to manage soil stockpiles and excavated materials. <p>As set out on the Outline Drainage Strategy (Volume 6.4) [REP1-017], SuDS principles will be utilised for attenuation storage and treatment to reduce the discharge to greenfield runoff rates and prevent pollution of the HWIDB drains.</p> <p>Extensive consultation has been undertaken with the Environment Agency, Hundred of Wisbech IDB and King's Lynn IDB during pre-application and remains ongoing following the submission of the DCO application. A summary of the consultation undertaken to date is set out in Appendix 12B (Stakeholder Engagement) of the ES (Volume 6.4) [APP-085]. The Flood Risk Assessment (Volume 6.4) [APP-084] shows that the Proposed Development, with the proposed flood risk management measures in place, would not be subject to an unacceptable level of flood risk, nor would it</p>



ExA ID	Interested Party	Applicant Response
		<p>increase flood risk elsewhere. It would also not result in any loss of functional floodplain storage or impede water flows. The Environment Agency's agreement with the Flood Risk Assessment (Volume 6.4) [APP-084] is reflected in the Statement of Common Ground with the EA (Volume 9.7) (Rev 3) submitted at Deadline 3.</p> <p><u>Historic environment</u></p> <p>The impact of the Proposed Development on listed buildings within the local area is presented in ES Chapter 10: Historic Environment (Volume 6.2) [APP-037]. The assessment concludes that there would be no significant effects on listed buildings.</p> <p><u>Landscape</u></p> <p>The matters raised in relation to the impact on landscape, particularly the Fens, have been raised by other IPs and responded to by the Applicant. For example, see the Applicant's response to RR-032 (Volume 9.2) [REP1-029].</p> <p>In summary, the LVIA assessed the effects of the Proposed Development on 19 local landscape character areas/types all of which lie within NCA 46 - The Fens. The assessment concluded that there would be the potential for locally significant effects within the Wisbech Settled Fen LCA closest to the EfW CHP Facility. No other significant landscape effects were identified as reported in paragraphs 9.9.2 to 9.2.20 of ES Chapter 9 Landscape and Visual (Volume 6.2) [APP-036].</p> <p><u>Odour</u></p> <p>The matters raised in relation to potential odour have been raised by other IPs and responded to by the Applicant. For example, see the Applicant's response to RR-079 (Volume 9.2) [REP1-029].</p> <p>In summary, the environmental impacts of the Proposed Development including those that could affect the local community, such as odour, have been assessed and reported in the ES and summarised in the Non-Technical Summary (Volume 6.1) [APP-027]. The Applicant has prepared an Outline Odour Management Plan (Volume 7.11) (Rev 2) [REP1-021], secured in Requirement 16 of the Draft DCO (Volume 3.1) (Rev 3) which details all sources of odour, control measures, monitoring, including a complaints procedure, and reporting.</p>



ExA ID	Interested Party	Applicant Response
		<p><u>Amenity</u></p> <p>The operation of the Proposed Development is not anticipated to result in any significant effects on sensitive receptors during operation with respect to loss of amenity, light and noise pollution as confirmed in ES Chapter 7 Noise and Vibration (Volume 6.2) [APP-034] and ES Chapter 16 Health (Volume 7.2) [APP-043]. Embedded mitigation, including the Outline Lighting Strategy (Volume 6.4) [APP-071] secured in Requirement 18 of the draft DCO (Volume 3.1) (Rev 3) and the Outline Operational Noise Management Plan (Volume 6.4) [REP1-013] secured in Requirement 19 of the draft DCO (Volume 3.1) (Rev 3) would ensure that the effects are not significant.</p> <p><u>Health</u></p> <p>The concerns relating to pollution have been raised by other IPs and responded to by the Applicant. For example, see the Applicant's response to RR-026 and RR-033 (Volume 9.2) [REP1-029]. In summary, the assessment of health is presented in ES Chapter 16 Health (Volume 6.2) [APP-043]. A range of mitigation measures embedded into the draft DCO (Volume 3.1) (Rev 3) and Environmental Permit will ensure no significant adverse health effects.</p> <p><u>Requests for information</u></p> <p>The written representation lists a number of points where it is asserted information is not known. The Applicant's response to these points is set out below if not already covered under the topics listed above.</p> <p><i>Waste availability and processing</i></p> <p>The Waste Fuel Availability Assessment (Volume 7.3) [REP2-009] provides information on the nature and sources of waste that will be burned at the EfW CHP Facility.</p> <p>Information on waste deliveries and storage is provided in ES Chapter 3: Description of the Proposed Development (Volume 6.2) [APP-030]. Waste is sorted prior to delivery to the Facility.</p> <p><i>Transportation of IBA / APCr</i></p> <p>The Applicant's response to the ExA's Written Questions (ExQ1) – Appendix 10.2B Technical Note: IBA and APCr Sites and Capacity submitted at Deadline 2 [REP2-019] sets out the Applicant's consideration of potential locations</p>



ExA ID	Interested Party	Applicant Response
		<p>for (including capacity) IBA and APCr treatment/disposal facilities, in accordance with the requirements of paragraph 2.5.77 in NPS EN-3.</p> <p>Also refer to the Applicant's response to ExQ1 PND 1.2 in the Applicant's Response to the ExA's Written Questions (ExQ1) [REP2-019] which confirms that APCr is the only hazardous waste that will be transported from the site.</p> <p><i>Climatic conditions</i></p> <p>Response PR01 of the Applicant's response Summary of Oral Submissions made by Interested Parties at Open Floor Hearings 1 and 2 and the Applicant's Response (Volume 9.23) [REP1-056] confirms that ES Chapter 8: Air Quality (Volume 6.2) [APP-035] considered 5 years of meteorological data to ensure all potential weather conditions are assessed.</p>
REP2-050	Fenland and West Norfolk Friends of the Earth	<p>No new issues raised.</p> <p>The matters raised are addressed in the Applicant's response to the IP's Relevant Representation RR-031 see Applicant's Comments on the Relevant Representations Part 2 – Other Interested Parties and 3(b) Statutory Parties (Volume 9.2) [REP1-029].</p>
REP2-051	Hutchinson Group Limited	<p>Except for property prices, the matters raised are addressed in the Applicant's response to the IP's Relevant Representation RR-042 see Applicant's Comments on the Relevant Representations Part 2 – Other Interested Parties and 3(b) Statutory Parties (Volume 9.2) [REP1-029].</p> <p>Concerns around property prices have been raised by other IP's, for example, see the Applicant's response to RR-046 (Volume 9.2) [REP1-029]. In summary, as part of the assessment undertaken in ES Chapter 15: Socio economics, Tourism, Recreation and Land Use (Volume 6.2) [APP-042] the Applicant reviewed the local housing market. The assessment concludes that the Proposed Development would not by itself decrease house prices in the Study Areas due to the implementation of the proposed mitigation measures.,</p> <p>No other new issues have been raised.</p>



ExA ID	Interested Party	Applicant Response
REP2-052	Jenny Perryman	<p>A number of the comments raised in this relevant representation are addressed in the Applicant's response Summary of Oral Submissions made by Interested Parties at Open Floor Hearings 1 and 2 and the Applicant's Response (Volume 9.23) [REP1-056], including:</p> <ul style="list-style-type: none"> • Democratic process – DP01 and DP02 • Impact on businesses – RE05, AW series • Traffic routing and access (including restrictions) – HT01 • Areas of deprivation – LE series • Site selection – AL01 • Sequential test and flooding – AL06, FR02, FR03 <p><u>National Highways</u></p> <p>The Applicant has engaged with National Highways in relation to the potential impacts on the A47. The matters discussed with National Highways are set out in a draft Statement of Common Ground (Volume 9.15) [REP1-049]. The Applicant's response to the National Highways Written Representation is set out in the Applicant's comments on the Written Representations – Part 1 (Volume 11.3). As set out in National Highways' Written Representation [REP2-037], National Highways does not object to the principle of the Proposed Development subject to the incorporation of agreed protective provisions within the draft DCO.</p> <p><u>Waste hierarchy and fuel availability</u></p> <p><u>Waste Need</u></p> <p>An updated version of the WFAA was produced at Deadline 2 – see WFAA (Volume 7.3) [REP2-009]. This provides a clear and robust case of need – and one which is based upon a range of up to date, publicly available, credible and rigorously examined data sources. This has continued to conclude that there is insufficient existing or planned residual waste management capacity available to ensure that residual, 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). The WFAA (Rev 2) demonstrates that the project would not result in an overcapacity of waste management at either a local or a national level.</p>



ExA ID	Interested Party	Applicant Response
		<p>The focus of the Applicant's assessment is on the diversion of non-recyclable residual waste from being managed at the bottom of the waste hierarchy in landfill. The Proposed Development would not divert waste from any means of management than from landfill or exportation (which are both covered in some detail in the WFAA (Volume 7.3) [REP2-009]) due to the scope of its Environmental Permit limiting the waste that can be accepted by the EfW CHP Facility.</p> <p>Requirement 14 in Schedule 2 of the Draft Development Consent Order (Volume 3.1) (Revision 3 has been produced at Deadline 3) confirms that a scheme must be submitted to the relevant planning authority that sets out how the Applicant will maintain the waste hierarchy and minimise the receipt of recyclable and reusable waste at the EfW CHP Facility.</p> <p><u>Project benefits</u></p> <p>The potential benefits of the Proposed Development are set out in the Project Benefits Report (Volume 7.4) [APP-095]. This includes consideration of diverting waste from landfill, CHP technology and carbon capture readiness, and environmental and socio-economic benefits.</p> <p>The impacts on employment have been assessed and reported in the ES and summarised in the Non-Technical Summary (Volume 6.1) [APP-027]. ES Chapter 15: Socio-Economics, Tourism, Recreation and Land Use (Volume 6.2) [APP-042] concludes that there will be significant beneficial effects on employment.</p> <p><u>Climate</u></p> <p>The assessment methodology for the quantification of GHG emissions is clearly described in Section 14.8 and 14.9 of Chapter 14: Climate Change (Volume 6.2) [APP-041]. The assessment includes quantification of emissions from operational transport including HGVs, considering the likely origin of the residual waste. The assessment also includes consideration of the construction phase: considering construction transport, embodied carbon of materials and process emissions.</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>



ExA ID	Interested Party	Applicant Response
		<p>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></p> <p>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 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', where 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>It is acknowledged that as a standalone entity the Proposed Development results in net carbon emissions when considering emissions from the EfW combustion processes compared to avoided emissions for energy generated by the EfW CHP Facility. However, the GHG assessment in Section 14.9 of ES Chapter 14: Climate Change (Volume 6.2) [APP-041] indicates a net reduction in emissions in the 'with Proposed Development' scenario compared to a 'without Proposed Development' scenario. EfW is the generation of partly renewable electricity and/or usable heat from non-recyclable waste. 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. 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.</p> <p><u>IBA / APCr</u></p> <p>The Applicant's response to the ExA's Written Questions (ExQ1) – Appendix 10.2B Technical Note: IBA and APCr Sites and Capacity submitted at Deadline 2 [REP2-019] sets out the Applicant's consideration of potential locations for (including capacity) IBA and APCr treatment/disposal facilities, in accordance with the requirements of paragraph 2.5.77 in NPS EN-3.</p>



ExA ID	Interested Party	Applicant Response
		<p>Also refer to the Applicant's response to ExQ1 PND 1.2 in the Applicant's Response to the ExA's Written Questions (ExQ1) [REP2-019].</p> <p><u>Anglian Water</u></p> <p>Extensive engagement has been undertaken with Anglian Water to ensure that the proposed design and mitigation measures effectively protect Anglian Water resources. A record of the agreements reached is provided in the draft Statement of Common Ground (Volume 9.10) [REP1-044].</p> <p><u>Air Quality</u></p> <p>Regarding bioaccumulation, a Human Health Risk Assessment (HHRA), ES Appendix 8B: Air Quality Technical Report, Annex G (Volume 6.4) (Revision 3.0) [REP2-006] has been prepared which considers the potential effects arising from chimney emissions upon humans. The HHRA assumes that the receptors would eat food grown in the local area and considers potential impacts from the bioaccumulation of, for example, polychlorinated dibenzofurans (PCDD/Fs) and dioxin-like PCBs in the food chain. The assessment concludes that there would be no significant effects.</p> <p>An application has been made by the Applicant for an Environmental Permit (EP) in August 2022 and the Applicant was informed by the Environment Agency that it was duly made on 23 March 2023. An assessment of the Best Available Technology (BAT) for the plant is included in the EP submission.</p> <p>The BAT Assessment concludes that selective non-catalytic reduction (SNCR) represents the BAT option for the proposed EfW CHP Facility. This is because whilst selective catalytic reduction (SCR) performs better from a NO_x emissions release perspective (NO_x emission reductions achieved with SNCR are expected to be 78% of those achieved with SCR), SNCR has fewer cross media effects than SCR (e.g. ammonia slip and spent catalyst waste streams) and, on its own, will meet the required BAT Associated Emission Levels (BAT-AELs) and prevent an exceedance of environmental benchmarks.</p> <p>The emission concentrations used in the dispersion modelling are presented in Table 8B4.2 of Environmental Statement Appendix 8B: Air Quality Technical Report Revision: 3.0 (Volume 6.4) [REP2-006]. This Appendix was updated for Deadline 2, but Table 8B4.2 has remained unchanged since original publication. Table 8B4.2 confirms that the upper NO_x BAT-AEL (120 mg/Nm³) was used for the dispersion modelling, reflecting the selection of SNCR.</p>



ExA ID	Interested Party	Applicant Response
REP2-053	John Colin Ogden	<p data-bbox="607 368 853 395"><u>Traffic and Transport</u></p> <p data-bbox="607 432 1998 486">Concerns regarding the impacts of traffic on the road network have been raised by a number of IPs and are addressed in the Applicant's Comments on the Relevant Representations (Volume 9.2) [REP1-028 to 035].</p> <p data-bbox="607 523 1998 890">In summary, the environmental impacts of the Proposed Development including HGV traffic associated with construction and operation, have been assessed and reported in ES Chapter 6 Traffic and Transport (Volume 6.2), [APP-033] accompanied by Appendix 6B Transport Assessment (TA) (Volume 6.4) [APP-073]. The Proposed Development also includes for improvements to New Bridge Lane which include for widening, a footpath, pedestrian crossing points and reducing the road speed from the national speed limit to 30mph. Embedded mitigation would be delivered via a suite of management plans, including the Construction Traffic Management Plan (CTMP) (Volume 6.4) [REP1-011] – secured by Requirement 11, Draft DCO (Volume 3.1) (Rev 3), Operational Traffic Management Plan (OTMP) (Volume 7.15) (Rev 3) including route restrictions to reduce impacts to Wisbech Town and surrounding villages – secured by Requirement 12, Draft DCO (Volume 3.1) (Rev 3) and an Operational Travel Plan (Volume 6.4) [APP-074] – secured by Requirement 15, Draft DCO (Volume 3.1) (Rev 3). The CTMP also sets out the process of surveying and repairing any damage made to the highway as a result of the construction works. The assessment concludes that there will be no significant residual effects resulting from the increase in HGV traffic.</p> <p data-bbox="607 927 748 954"><u>Waste need</u></p> <p data-bbox="607 991 1998 1134">Comments on the 'proximity principle' have been raised by other IPs and responded to by the Applicant. For example, see the Applicant's response to RR-216 Applicant's Comments on the Relevant Representations Part 2 – Other Interested Parties and 3(b) Statutory Parties (Volume 9.2) [REP1-031]. In summary, the responses set out how the waste market is influenced, which affects the sources of waste over the lifetime of the Proposed Development. The use of a 2-hour drive time is justified within the WFAA (Volume 7.3) [REP2-009].</p> <p data-bbox="607 1171 725 1198"><u>Air Quality</u></p> <p data-bbox="607 1235 1998 1289">The Applicant has responded to concerns raised in relation to Air Quality within their response to the relevant representations. For example, see the Applicant's response to RR-031 (Volume 9.2) [REP1-029].</p> <p data-bbox="607 1326 1998 1412">In summary, the environmental impacts of the Proposed Development including air quality have been assessed. ES Chapter 8: Air Quality (Volume 6.2) [APP-035] includes detailed dispersion modelling from the chimney and includes traffic modelling of HGVs during construction and operation, to predict potential impacts on human and ecological</p>



ExA ID	Interested Party	Applicant Response
		<p>receptors. The air quality assessment was undertaken considering air quality objectives for a series of pollutants including metals and particulate matter (PM), set for the protection of human health and ecological sites and concludes that effects are not significant.</p> <p>All EfW facilities in England require an Environmental Permit (EP) from the Environment Agency to operate. The EP has been submitted and the Applicant was informed by the Environment Agency that it was duly made on 23 March 2023. 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.</p> <p><u>Climate</u></p> <p>The assessment described in ES Chapter 14: Climate Change (Volume 6.2) [APP-041] Section 14.9 is based on assessing whether the Proposed Development would impede the UK in being carbon net zero by 2050, this being the UK position in terms of meeting international obligations to reduce carbon emissions. Relative to the 'without Proposed Development' scenario (where waste is landfilled), the Proposed Development has lower GHG emissions which will support the UK Government in meeting its carbon budgets/targets.</p> <p>Requirement 22 has been introduced into the Draft DCO (Volume 3.1) [REP1-007] at Deadline 1 to secure the carbon capture and export readiness reserve space required to deliver future environmental requirements relating to carbon capture and storage. A Carbon Capture and Export Readiness Reserve Space Plan (Volume 10.7) [REP2-024] demonstrating how this space would be utilised has been produced and submitted at Deadline 2.</p> <p>In addition, Requirement 23 has been introduced into the Draft DCO (Volume 3.1) [REP1-007] at Deadline 1 to secure the production of a carbon capture readiness monitoring report which will set out how the undertaker is monitoring the ongoing feasibility of carbon capture and explore technology.</p>
REP2-054	Kings Lynn Without Incineration (KLWIN)	<p>No new issues raised.</p> <p>The matters raised are addressed in the Applicant's response to the IP's Relevant Representation RR-044 see Applicant's Comments on the Relevant Representations Part 2 – Other Interested Parties and 3(b) Statutory Parties (Volume 9.2) [REP1-029].</p>



ExA ID	Interested Party	Applicant Response
REP2-055	Lynne Hayden	<p data-bbox="607 368 685 395"><u>Health</u></p> <p data-bbox="607 432 1998 520">The concerns relating to pollution, particularly on schools and other sensitive receptors have been raised by other IPs and responded to by the Applicant. For example, see the Applicant's response to RR-026 and RR-033 (Volume 9.2) [REP1-029].</p> <p data-bbox="607 557 1998 644">In summary, the assessment of health is presented in ES Chapter 16 Health (Volume 6.2) [APP-043]. A range of mitigation measures embedded into the draft DCO(Rev 3) and Environmental Permit will ensure no significant adverse health effects.</p> <p data-bbox="607 681 853 708"><u>Traffic and Transport</u></p> <p data-bbox="607 745 1998 799">Concerns regarding the impacts of traffic on the road network have been raised by a number of IPs and are addressed in the Applicant's Comments on the Relevant Representations (Volume 9.2) [REP1-028 to -035].</p> <p data-bbox="607 836 1998 1198">In summary, the environmental impacts of the Proposed Development including HGV traffic associated with construction and operation, have been assessed and reported in ES Chapter 6 Traffic and Transport (Volume 6.2), [APP-033] accompanied by Appendix 6B Transport Assessment (TA) (Volume 6.4) [APP-073]. The Proposed Development also includes for improvements to New Bridge Lane which include for widening, a footpath, pedestrian crossing points and reducing the road speed from the national speed limit to 30mph. Embedded mitigation would be delivered via a suite of management plans, including the Construction Traffic Management Plan (CTMP) (Volume 6.4) [REP1-011] – secured by Requirement 11, Draft DCO (Volume 3.1) (Rev 3), Operational Traffic Management Plan (OTMP) (Volume 7.15) (Rev 3) including route restrictions to reduce impacts to Wisbech Town and surrounding villages – secured by Requirement 12, Draft DCO (Volume 3.1) (Rev 3) and an Operational Travel Plan (Volume 6.4) [APP-074] – secured by Requirement 15, Draft DCO (Volume 3.1) (Rev 3). The CTMP also sets out the process of surveying and repairing any damage made to the highway as a result of the construction works. The assessment concludes that there will be no significant residual effects resulting from the increase in HGV traffic.</p> <p data-bbox="607 1235 786 1262"><u>Property prices</u></p> <p data-bbox="607 1299 1998 1385">The concerns relating to property prices have been raised by other IPs and responded to by the Applicant. For example, see the Applicant's response to RR-025 Applicant's Comments on the Relevant Representations Part 2 – Other Interested Parties and 3(b) Statutory Parties (Volume 9.2) [REP1-029].</p>



ExA ID	Interested Party	Applicant Response
REP2-056	Nicola Sutheran	<p>In summary, as part of the assessment undertaken in ES Chapter 15: Socio economics, Tourism, Recreation and Land Use (Volume 6.2) [APP-042] the Applicant reviewed the local housing market. The assessment concludes that the Proposed Development would not by itself decrease house prices in the Study Areas, having regard to the proposed mitigation measures.</p> <p><u>Climate</u></p> <p>Concerns relating to climate change have been raised by other IPs and responded to by the Applicant. For example, see the Applicant's response to RR-032 Applicant's Comments on the Relevant Representations Part 2 – Other Interested Parties and 3(b) Statutory Parties (Volume 9.2) [REP1-029]. In summary, the assessment described in ES Chapter 14: Climate Change (Volume 6.2) [APP-041] Section 14.9 concludes that the Proposed Development would reduce GHG emissions, which will support the UK Government in meeting its carbon budgets/targets.</p> <p>The matters raised by the IP in relation to the site selection process, human health, biodiversity, air quality, property prices, and landscape and visual effects are addressed in the Applicant's response to the IP's Relevant Representation RR-581 see Applicant's Comments on the Relevant Representations Part 7 – Other Interested Parties and 3(b) Statutory Parties (Volume 9.2) [REP1-034].</p> <p><u>Traffic and Transport</u></p> <p>The matters raised in relation to traffic and transport, in particular the impact on the A47 and vehicle routing are addressed in the Applicant's response Summary of Oral Submissions made by Interested Parties at Open Floor Hearings 1 and 2 and the Applicant's Response (Volume 9.23) [REP1-056]. See response TR01, TR04, TR05, HT01, HT03, HT04 and HT05.</p> <p>In summary, the responses confirm that a detailed assessment of effects on the road network was carried out as reported in ES Chapter 6 Traffic and Transport (Volume 6.2) [APP-033] and accompanying Appendix 6A Transport Assessment (ES Chapter 6 Traffic and Transport Appendix 6B Volume 6.4 APP-073). Taking account of embedded mitigation measures set out in the Outline Construction Traffic Management Plan (Volume 6.4) [REP1-011] secured in Requirement 11 of the draft DCO (Volume 3.1) (Rev 3) and the Outline Operational Traffic Management Plan (Volume 7.15) (Rev 3), secured in Requirement 12 of the draft DCO (Volume 3.1) (Rev 3), effects on the road network are not anticipated to be significant.</p>



ExA ID	Interested Party	Applicant Response
		<p><u>Pollution</u></p> <p>The concerns relating to pollution, particularly on schools and other sensitive receptors have been raised by other IPs and responded to by the Applicant. For example, see the Applicant's response to RR-026 and RR-033 (Volume 9.2) [REP1-029].</p> <p>In summary, the assessment of health is presented in ES Chapter 16 Health (Volume 6.2) [APP-043]. A range of mitigation measures embedded into the draft DCO [REP1-007] and Environmental Permit will ensure no significant adverse health effects.</p> <p><u>Property Prices</u></p> <p>Concerns around property prices have been raised by other IP's, for example, see the Applicant's response to RR-046 (Volume 9.2) [REP1-029]. In summary, as part of the assessment undertaken in ES Chapter 15: Socio economics, Tourism, Recreation and Land Use (Volume 6.2) [APP-042] the Applicant reviewed the local housing market. The assessment concludes that the Proposed Development would not by itself decrease house prices in the Study Areas due to the implementation of the proposed mitigation measures.</p> <p><u>Impact on emergency services</u></p> <p>An assessment of major accidents and disasters is presented in ES Chapter 17 Major Accidents and Disasters (Volume 6.2) [APP-044]. The assessment considers the potential for incidents at the EfW CHP Facility, and determines that there would be no significant effects. An Outline Fire Prevention Plan (Volume 7.10) [REP2-011] has been produced and is secured in Requirement 17 of the draft DCO (Volume 3.1)(Rev 3).</p> <p>The Applicant has engaged with the East of England Ambulance Care Trust (and Cambridgeshire and Peterborough Integrated Care System) to discuss the Proposed Development and incorporated their mitigation requirements into the Outline Construction Traffic Management Plan (Volume 6.4) [REP1-011] and Outline Operational Traffic Management Plan (Volume 7.15) [REP1-026] submitted at Deadline 1. A signed Statement of Common Ground between Medworth CHP Limited, the East of England Ambulance Service NHS Trust and Cambridgeshire and</p>



ExA ID	Interested Party	Applicant Response
		<p>Peterborough Integrated Care System (Volume 9.11) [REP2-014] was submitted at Deadline 2 and confirmed that all parties agreed that no significant effects would occur.</p> <p>Cambridgeshire Constabulary has not engaged with the Applicant or submitted a relevant representation in relation to the application. The Applicant has however prepared a Transport Assessment (ES Chapter 6 Traffic and Transport Appendix 6B Transport Assessment Volume 6.4 [APP-073]). This concludes that the Proposed Development would not lead to congestion on the local and strategic highway network. The Applicant's Outline CTMP (Volume 6.4) [REP1-011] and Outline OTMP (Volume 7.15) (Rev 3) include for the establishment of a liaison group. Through the local liaison group the Applicant will provide advanced warning of any planned operational changes that may have the potential to affect the free flow of traffic on the surrounding highway network.</p>
REP2-057	Optimum Packaging Limited	<p>The matters raised by the IP are addressed in the Applicant's response to the IP's Relevant Representation RR-047 see Applicant's Comments on the Relevant Representations Part 2 – Other Interested Parties and 3(b) Statutory Parties (Volume 9.2) [REP1-029].</p>
REP2-058	Paul Merrell	<p>The matters raised by the IP in relation to socio-economics are addressed in the Applicant's response to the IP's Relevant Representation RR-441 see Applicant's Comments on the Relevant Representations Part 6 – Other Interested Parties and 3(b) Statutory Parties (Volume 9.2) [REP1-033].</p> <p><u>Health</u></p> <p>The concerns relating to health have been raised by other IPs and responded to by the Applicant. For example, see the Applicant's response RR-033 (Volume 9.2) [REP1-029]. In summary, the assessment of health is presented in ES Chapter 16 Health (Volume 6.2) [APP-043]. A range of mitigation measures embedded into the draft DCO (Rev 3) and Environmental Permit will ensure no significant adverse health effects.</p> <p><u>Agricultural Land – food production</u></p> <p>Matters relating to the impact on food production on nearby agricultural land have been raised by other IPs and responded to by the Applicant. For example, see the Applicant's response RR-005 (Volume 9.2) [REP1-029]. In summary, a Human Health Risk Assessment (HHRA), ES Appendix 8B: Air Quality Technical Report, Annex G</p>



ExA ID	Interested Party	Applicant Response
REP2-059	Paul Wilson	<p>(Volume 6.4) (Rev 3.) [REP2-006]] has been prepared which considers the potential effects arising from chimney emissions upon humans. The Assessment assumes that the receptors would eat food grown in the local area and considers potential impacts from the bioaccumulation of, for example, polychlorinated dibenzofurans (PCDD/Fs) and dioxin-like PCBs in the food chain. The assessment concludes that potential effects are not significant.</p> <p><u>Pest and vermin control</u></p> <p>Paragraph 3.5.47 of ES Chapter 3 Description of the Proposed Development (Volume 6.2) [APP-030] sets out the approach to monitoring and controlling pests, insects and vermin.</p> <p><u>Drainage</u></p> <p>The approach to drainage is set out in ES Chapter 3 Description of the Proposed Development (Volume 6.2) [APP-030] and the Outline Drainage Strategy (Volume 6.4) [REP1-017] which is secured in requirement 8 of the draft DCO (Volume 3.1) (Rev 3). Taking into account the embedded mitigation measures, the impact on watercourse is not anticipated to be significant.</p> <p><u>Transportation of IBA / APCr</u></p> <p>The written representation The Applicant's response to the ExA's Written Questions (ExQ1) – Appendix 10.2B Technical Note: IBA and APCr Sites and Capacity submitted at Deadline 2 [REP2-019] sets out the Applicant's consideration of potential locations for (including capacity) IBA and APCr treatment/disposal facilities, in accordance with the requirements of paragraph 2.5.77 in NPS EN-3.</p> <p><u>Project benefits</u></p> <p>The potential benefits of the Proposed Development in addition to job creation are set out in the Project Benefits Report (Volume 7.4) [APP-095]. This includes consideration of diverting waste from landfill, CHP technology and carbon capture readiness, and environmental and socio-economic benefits.</p> <p>The matters raised by the IP are addressed in the Applicant's response Summary of Oral Submissions made by Interested Parties at Open Floor Hearings 1 and 2 and the Applicant's Response (Volume 9.23) [REP1-056]. See response TR01, TR04, TR05, YO01 to YP04 and PR01.</p>



ExA ID	Interested Party	Applicant Response
REP2-060	Philip Brown	<p>The matters raised by the IP are addressed in the Applicant's Summary of Oral Submissions made by Interested Parties at Open Floor Hearings 1 and 2 and the Applicant's Response (Volume 9.23) [REP1-056]. See responses to TR01 YP01 to YP04, PR01, HM01 and WF09.</p> <p>In addition, concerns have been raised in the Written Representation in relation to the negative impact on tourism and local businesses. Other IPs have raised similar concerns and have been responded to by the Applicant. For example, see the Applicant's response RR-035 (Volume 9.2) [REP1-029]. In summary, ES Chapter 15: Socio-Economics, Tourism, Recreation and Land Use (Volume 6.2) [APP-042] assesses impacts on local businesses and residents and concludes, there will be no significant effects. Where necessary, embedded mitigation is included within the design of the Proposed Development and ongoing operational management plans will ensure that the EfW CHP Facility will continue to be operated appropriately.</p>
REP2-061	Phyl Sugden	<p>The matters raised by the IP are addressed in the Applicant's Summary of Oral Submissions made by Interested Parties at Open Floor Hearings 1 and 2 and the Applicant's Response (Volume 9.23) [REP1-056]. See response SZ01, HM01 and TR01.</p>
REP2-062	Robert Mitchell	<p><u>Waste Need</u></p> <p>The EfW CHP Facility Site was allocated for waste treatment facilities in the previous Cambridgeshire and Peterborough Minerals and Waste Local Plan and is safeguarded as a Waste Management Area within the Development Plan adopted in 2021. The site is located within an industrial area south of the town centre. When considering a site, the Applicant identified 'essential' and 'preferable' site selection criteria that were applied and suitably meet. In summary, the selection criteria included:</p> <ul style="list-style-type: none"> • There is a need for additional residual waste treatment within the area; • In close proximity to existing business that have a large heat and/or power demand; • A site of a suitable size to accommodate the EfW CHP Facility; • Good access to the strategic road network; • A brownfield site allocated for waste management; and • A site free of environmental designations. <p><u>Air Quality</u></p>



ExA ID	Interested Party	Applicant Response
		<p>The Applicant has responded to concerns raised in relation to Air Quality within their response to the relevant representations. For example, see the Applicant's response to RR-031 (Volume 9.2) [REP1-029].</p> <p>In summary, the environmental impacts of the Proposed Development including air quality have been assessed. ES Chapter 8: Air Quality (Volume 6.2) [APP-035] includes detailed dispersion modelling from the chimney and includes traffic modelling of HGVs during construction and operation, to predict potential impacts on human and ecological receptors. The air quality assessment was undertaken considering air quality objectives for a series of pollutants including metals and particulate matter (PM), set for the protection of human health and ecological sites and concludes that effects are not significant.</p>
REP2-063	Robert Sugden	<p>The matters raised by the IP are addressed in the Applicant's Summary of Oral Submissions made by Interested Parties at Open Floor Hearings 1 and 2 and the Applicant's Response (Volume 9.23) [REP1-056]. See response YP01 to YP04, PR01, HM01 and TR01.</p>
REP2-064	Rt Hon Stephen Barclay MP	<p>The Applicant's response is provided in Section 3 of this document.</p>
REP2-065	Stephen Charles Wenn	<p><u>Alternatives</u></p> <p>Matters relating to the siting of the Proposed Development have been raised by other IPs and responded to by the Applicant. For example, see the Applicant's response to RR-034 (Volume 9.2) [REP1-029]. In summary, the Applicant considered a range of site selection criteria when selecting the location of the Proposed Development. This is explained in Section 2.3.1 to 2.3.3 ES Chapter 2 Alternatives (Volume 6.2) [APP-029] and ES Chapter 3 (Volume 6.2) [APP-030].</p> <p><u>Climate</u></p> <p>Concerns relating to climate change have been raised by other IPs and responded to by the Applicant. For example, see the Applicant's response to RR-032 Applicant's Comments on the Relevant Representations Part 2 – Other</p>



ExA ID	Interested Party	Applicant Response
		<p>Interested Parties and 3(b) Statutory Parties (Volume 9.2) [REP1-029]. In summary, the assessment described in ES Chapter 14: Climate Change (Volume 6.2) [APP-041] Section 14.9 concludes that the Proposed Development would support the Proposed Development would reduce GHG emissions, which will support the UK Government in meeting its carbon budgets/targets.</p> <p><u>Waste need</u></p> <p>Concerns relating to the need for the Proposed Development have been raised by other IPs (including Stephen Barclay MP [REP2-064] – to whom this respondent wishes to have their comments considered alongside), and responded to by the Applicant. An updated version of the WFAA was produced at Deadline 2 – see WFAA (Volume 7.3) [REP2-009]. This provides a clear and robust case of need – and one which is based upon a range of up to date, publicly available, credible and rigorously examined data sources. This has continued to conclude that there is insufficient existing or planned residual waste management capacity to ensure that residual 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). The WFAA (Revision 2) demonstrates that the project would not result in an overcapacity of waste management at either a local or a national level.</p> <p>The focus of the Applicant's assessment is on the diversion of non-recyclable residual waste from being managed at the bottom of the waste hierarchy in landfill. The Proposed Development would not divert waste from any means of management than from landfill or exportation (which are both covered in some detail in the WFAA (Volume 7.3) [REP2-009]), due to the scope of its Environmental Permit limiting the waste that can be accepted by the EfW Facility.</p> <p>Requirement 14 in Schedule 2 of the Draft DCO (Volume 3.1) (Revision 3 has been produced at Deadline 3) confirms that a scheme must be submitted to the relevant planning authority that sets out how the Applicant will maintain the waste hierarchy and minimise the receipt of recyclable and reusable waste at the EfW CHP Facility.</p> <p><u>Environmental Permit</u></p> <p>All EfW facilities in England require an Environmental Permit (EP) from the Environment Agency to operate. The EP has been submitted and the Environment Agency confirmed that it had been duly made on 23 March 2023. 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.</p>



ExA ID	Interested Party	Applicant Response
REP2-066	United Kingdom Without Incineration Network (UKWIN)	The Applicant's response is provided in Section 4 of this document.
REP2-067	Valerie and John Witby	<p data-bbox="607 512 853 539"><u>Historic Environment</u></p> <p data-bbox="607 571 2004 659">The impact of the Proposed Development on listed buildings within the local area is presented in ES Chapter 10: Historic Environment (Volume 6.2) [APP-037]. The assessment concludes that there would be no significant effects on listed buildings (or upon conservation areas).</p> <p data-bbox="607 695 752 722"><u>Plant design</u></p> <p data-bbox="607 759 2004 815">Water used at the EfW CHP Facility is purified at the on-site water treatment plant, therefore, the steam pipeline would not be affected by the build-up of limescale.</p> <p data-bbox="607 852 860 879"><u>Environmental Permit</u></p> <p data-bbox="607 916 2004 1027">All EfW facilities in England require an Environmental Permit (EP) from the Environment Agency to operate. The EP has been submitted and the Environment Agency confirmed that it had been duly made on 23 March 2023. 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.</p> <p data-bbox="607 1064 674 1091"><u>Siting</u></p> <p data-bbox="607 1128 2004 1246">The IP references a map which shows an area of land described as 'Medworth Rural'. The Applicant is not aware of the map referenced. However, it does accept the point that the EfW CHP Facility Site is not in a rural area but within the town of Wisbech. This is confirmed by the Fenland Draft Local Plan 2022 which shows that the site lies within the Wisbech settlement boundary.</p>
REP2-068	Valerie MacRae	The matters raised by the IP are addressed in the Applicant's:



ExA ID	Interested Party	Applicant Response
		<p>Summary of Oral Submissions made by Interested Parties at Open Floor Hearings 1 and 2 and the Applicant's Response (Volume 9.23) [REP1-056]. See response SZ06, CO01, IT03, TR01, TR05, AG01, HM01, YP01 to YP04, PR01 and PP02; and</p> <p>RR-005, RR-082, and RR-094 of the Applicant's Comments on the Relevant Representations – Part 2 Other Interested Parties and 3(b) Statutory Parties – Representations RR-001 – RR-099 (Volume 9.2) [REP1-029].</p>
REP2-069	Welle Streame Ltd	<p>The matters raised by the IP and concerning traffic surveys and congestions are addressed in the Applicant's Summary of Oral Submissions made by Interested Parties at Open Floor Hearings 1 and 2 and the Applicant's Response (Volume 9.23) [REP1-056]. See response TR01 and IT03</p> <p><u>Vehicle queuing preventing access to 10 New Bridge Lane</u></p> <p>The location of the weighbridge/gatehouse is set back from New Bridge Lane to allow, if required, vehicle queuing within the EfW CHP Facility Site, consequently there would not be backing-up onto the public highway (New Bridge Lane). The inset figure (below) demonstrates 10-walking floor HGVs (the longest type of HGVs), can be parked-up within the EfW CHP Facility Site prior to proceeding over the weighbridge, and still maintain an open lane into the EfW CHP Facility Site. The level of provision is considered adequate based on MVV's experience of designing and operating EfW CHP Facilities.</p>



ExA ID	Interested Party	Applicant Response
REP2-270	S Walters	<p data-bbox="607 1090 685 1118"><u>Health</u></p> <p data-bbox="607 1153 2011 1273">The concerns relating to pollution have been raised by other IPs and responded to by the Applicant. For example, see the Applicant's response to RR-026 and RR-033 (Volume 9.2) [REP1-029]. In summary, the assessment of health is presented in ES Chapter 16 Health (Volume 6.2) [APP-043]. A range of mitigation measures embedded into the draft DCO (Rev 3) and Environmental Permit will ensure no significant adverse health effects.</p> <p data-bbox="607 1321 853 1353"><u>Traffic and Transport</u></p>



The design of the acoustic barrier, including the width of the entrance and electric gates, will be agreed with the owners of 10 New Bridge Lane prior to construction, and would be expected to cater for their future needs. However, any approval of any future widening of the crossing of the ditch used to access the property would be for the owners of 10 New Bridge Lane to obtain from the appropriate authorities.



ExA ID	Interested Party	Applicant Response
		<p>Concerns regarding the impacts of traffic on the road network have been raised by a number of IPs and are addressed in the Applicant's Comments on the Relevant Representations (Volume 9.2) [REP1-028 to 035].</p> <p>In summary, the environmental impacts of the Proposed Development including HGV traffic associated with construction and operation, have been assessed and reported in ES Chapter 6 Traffic and Transport (Volume 6.2), [APP-033] accompanied by Appendix 6B Transport Assessment (TA) (Volume 6.4) [APP-073]. The Proposed Development also includes for improvements to New Bridge Lane which include for widening, a footpath, pedestrian crossing points and reducing the road speed from the national speed limit to 30mph. Embedded mitigation would be delivered via a suite of management plans, including the Construction Traffic Management Plan (CTMP) (Volume 6.4) [REP1-011] – secured by Requirement 11, Draft DCO (Volume 3.1) (Rev 3), Operational Traffic Management Plan (OTMP) (Volume 7.15) (Rev 3) including route restrictions to reduce impacts to Wisbech Town and surrounding villages – secured by Requirement 12, Draft DCO (Volume 3.1) (Rev 3) and an Operational Travel Plan (Volume 6.4) [APP-074] – secured by Requirement 15, Draft DCO (Volume 3.1) (Rev 3). The CTMP also sets out the process of surveying and repairing any damage made to the highway as a result of the construction works. The assessment concludes that there will be no significant residual effects resulting from the increase in HGV traffic.</p>

3. Comments on the Written Representation from Rt Hon Stephen Barclay MP

3.1 Introduction

3.1.1 This section provides a summary of the points raised in **REP2-064** and provides the Applicant's response to the points raised.

3.1.2 **Table 3.1** addresses the matters raised on a thematic basis under the following topic headings:

- Planning Statement;
- Waste Fuel Availability Assessment;
- Benefits of the Proposed Development;
- Alternatives (including the waste hierarchy); and
- Climate.

3.1.3 The Applicant confirmed in their response (**Volume 10.6**) [**REP2-023**] to Rt Hon Stephen Barclay MP's Post Hearing Submission [**REP1-094**] that further detail on the BAT-AELs applied and the emission rates used in the Applicant's dispersion modelling, and consideration of baseline air quality will be provided for Deadline 3. This information has been provided in the row "Appendix 3 – Air Quality" of **Table 3.1**.



Table 3.1 Comments on the written representation from Rt Hon Stephen Barclay MP

Topic	Representation reference	Summary of Representation	
Planning Statement	Main Report: Section 2.1 Decision-making	Section 2.1 of the written representation confirms that the relevant National Policy Statements (NPSs) are in this case, the National Policy Statement for Energy (EN-1), the National Policy Statement for Renewable Energy Infrastructure (EN-3), and the National Policy Statement for Electricity Networks Infrastructure (EN-5).	The Applicant's Planning Statement (Volume 7.1) [APP-091] confirms that NPS EN-1, EN-3 and EN-5 are the appropriate national policy statements for the application.
Planning Statement	Main Report: Section 2.2 Implications of Nature of EfW for Decision-making	Section 2.2 of the written representation states that EfW facilities are not, first and foremost, power generating facilities but installations whose primary objective is the treatment of waste. The response stresses the need to justify compliance with the waste hierarchy, and demonstrate that the proposed EfW would not result in over-capacity of EfW waste treatment at a national or local level (draft EN-3).	<p>The importance of the waste hierarchy is already reflected in existing NPS EN-3 at paragraph 2.5.2, which states that <i>“the recovery of energy from the combustion of waste, where in accordance with the waste hierarchy, will play an increasingly important role in meeting the UK’s energy needs”</i> and that where the waste burned is deemed renewable it will contribute to the UK’s renewable energy targets.</p> <p>The Draft NPS EN-3 (March 2023) similarly records at paragraph 3.7.2 that in accordance with the waste hierarchy EfW also plays an important role in meeting the UK’s energy needs and, as identified by the IP, that it must not compete with greater waste prevention, re-use, or recycling, or result in over-capacity of EfW waste treatment at a national or local level (paragraph 3.7.7).</p> <p>The Applicant’s WFAA updated for Deadline 2, WFAA (Volume 7.3) [REP2-009] demonstrates that the Proposed Development would be compliant with the waste hierarchy and would not prejudice efforts to increase waste prevention, re-use or recycling.</p>



Topic	Representation reference	Summary of Representation	
Planning Statement	Appendix 1: Comments on Planning Statement 3.0 Section 2: Proposed Development	1: It is suggested that the replacement of a recycling facility, half way through the planned period of operation, with an Energy from Waste Facility, would undermine government ambitions to halve recycling rates. 2:	<p>For the reasons set out within the WFAA (Volume 7.3) [REP2-009], the Proposed Development would not compromise efforts to increase re-use and recycling.</p> <p>It is acknowledged that the current use of the site is as a waste and aggregates recycling centre and a waste transfer station. The waste transfer station has an environmental permit to handle 75,000 tonnes of waste per annum. This is waste that is bulked up and then despatched for final treatment elsewhere. I.</p> <p>The EfW CHP Facility Site is allocated within the Cambridgeshire and Peterborough Waste and Minerals Local Plan as a waste management areas (Policy 10 WMAs). WMAs are existing or committed waste management sites. It is considered appropriate that a new waste management facility would be located in an industrial estate and on the site of an existing waste management facility.</p>
Planning Statement	Appendix 1: Comments on Planning Statement 3.0 Section 2: Proposed Development	1: The author of the report finds the design of the CHP pipeline at (roughly) head height surprising given that it would be in place for 40 years and queries whether local businesses, who would be concerned to reduce their own GHG emissions, would choose to take the steam given that there is no carbon capture. 2:	<p>The Applicant can confirm that the CHP Connection would be between 1.6 to 1.7m in height. This is confirmed within Es Chapter 3 Description of the Proposed Development (Volume 6.3) [APP-049] Figure 3.17.</p> <p>With regard to the design, an above ground low level steam pipeline is common practice since it allows easy access for routine inspection and any resultant maintenance. Additionally, the pipeline is proposed to be installed at sufficient height to allow any grounds maintenance to take place. In MVV's experience, a properly designed and installed steam pipeline will last for more than the 40 year design life without replacement. This is because the steam will be of very high quality, avoiding internal corrosion, and sufficient thermal</p>



Topic	Representation reference	Summary of Representation
Planning Statement	Appendix 1: Comments on Planning Statement 3.0 Section 2: Proposed Development	<p>The operation of the EfW CHP facility as a 'merchant' facility and compliance with the waste hierarchy.</p> <p>The WFAA (Volume 7.3) [REP2-009] demonstrates that there is sufficient waste that is currently being landfilled to support the EfW CHP Facility.</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) [REP2-009] 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) [REP2-009] 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.</p> <p>Importantly, the WFAA (Volume 7.3) [REP2-009] only considers the need for the Proposed Development in the context of how much residual waste will require management in the future. The achievement of national</p>



Topic	Representation reference	Summary of Representation
		<p>targets for the recycling and reuse of waste have been taken into account when considering how much residual waste is likely to require management in the future. In this regard, the WFAA (Volume 7.3) [REP2-009] concludes that at a national level:</p> <ul style="list-style-type: none"> • In 2021, ~9.95 million tonnes of residual HIC waste was disposed of to landfill, and 1.7 million tonnes was exported as refuse derived fuel (RDF) to Europe and beyond; and • 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 ~1.6 million tonnes of residual HIC capacity in the UK (rising to over 5 million tonnes if the Government's recycling target is undershot by 5%). <p>Furthermore, at a more localised level, the updated WFAA (Volume 7.3) [REP2-009] concludes that based upon the current pattern of waste arising and management across the spatial scope of the assessment, there is potential for around 2.6 million tonnes of material to be managed further up the waste hierarchy and/or at a location that is more proximate to the point of arising. Looking ahead to the position up to around 2035 it is estimated that there will be a gap in residual waste management capacity of at least ~1.3 million tonnes per annum.</p>



Topic	Representation reference	Summary of Representation
		<p>The waste composition used in the ES (Chapter 14 Climate Change (Volume 6.2) [APP-041]) has been based on the availability of residual waste going to landfill, as identified in the WFAA (Volume 7.3) submitted at Deadline 2. Information on the detailed breakdown of residual waste composition for relevant Waste Planning Authorities is limited in terms of consistency and quality, therefore, for the reasonable worst-case scenario at this stage, the assessment has used information on residual waste composition available from WRAP's national survey of municipal waste for England in 2017 (published in 2020)⁴, which is considered to be representative of waste that would be available for the EfW CHP Facility.</p>
Planning Statement	<p>Appendix 1: Comments on Planning Statement</p> <p>4.0 Section 3: Legislation and Policy Context</p>	<p><u>Legislation and Policy Context</u></p> <p>It is contended that the Applicant has failed to demonstrate that it is not possible to recycle some of the 630,000 tonnes of waste it proposes to be needed for the EfW CHP Facility and could it instead recycle more of the waste it receives.</p>
		<p>The WFAA (Volume 7.3) [APP-009] is clear that the capacity which it identifies at the national and local level is waste which is residual, i.e. waste that is left over following recycling and re-use and which it is not possible to recycle. This residual waste is currently being landfilled.</p> <p>The treatment of the waste through incineration with the subsequent recovery of energy in the form of electricity and steam moves its treatment up the waste hierarchy in accordance with government policy.</p>
Planning Statement	<p>Appendix 1: Comments on Planning Statement</p> <p>4.1 Legislative Context</p>	<p><u>Legislative Context</u></p> <p>A lack of reference to waste regulations such as The Waste (Circular Economy) (Amendment) Regulations 2020. There is no reference to The Environmental Targets (Residual Waste) (England) Regulations 2023', which came into force on 30 January 2023, but had been consulted upon in May 2022.</p>
		<p>The Planning Statement (Volume 7.1) [APP-091] identifies a number of waste and energy plans and policies at the national level although its focus is to present a planning assessment based upon the policies contained with NPS EN-1, EN-3 and EN-5 rather than list waste regulations. The Environmental Targets (Residual Waste) (England) Regulations 2023 came into force after the application was submitted. In its consideration of the</p>

⁴ WRAP (2020). National Municipal Waste Composition, England 2017, Table 3.



Topic	Representation reference	Summary of Representation	
Planning Statement	Appendix 1: Comments on Planning Statement 4.2 National Policy Statements	<u>National Policy Statements</u> Reference is made to NPS EN-1 paragraph 3.4.3, which indicates that only use waste that cannot be reused or recycled and would otherwise go to landfill should be used for energy recovery.	<p>need for the Proposed Development, the Planning Statement does assess conformance with government policy and regulation concerning waste. Whilst the Waste (Circular Economy) (Amendment) regulations are not considered, the principle of the circular economy within Our waste, Our resources: Strategy for England 2018 is noted. Irrespective, the Proposed Development would take residual waste that would otherwise be landfilled and would not compete with recycling and re-use of waste.</p> <p>Notwithstanding the above comment, the updated WFAA (Volume 7.3) [APP-009] does consider the Government's new residual waste targets set out in the Government's Environmental Improvement Plan (EIP). In this regard, the assessment concludes that even in the unlikely event of the EIP stretch target of halving residual waste by 2042 being achieved, there remains a clear need for the capacity offered by the Proposed Development.</p>
Planning Statement	Appendix 1: Comments on Planning Statement 4.3 Other Relevant National Policy	<u>Other Relevant National Policy</u> It is also relevant that the NPPF has a core environmental objective which is one of three pillars relevant to achieving sustainable development. The Proposed Development will not mitigate climate change, it will not use natural resources prudently, nor does its design minimise waste and pollution	<p>The WFAA (Volume 7.3) [REP2-009] identifies a need for the development based upon the redirection of residual waste from landfill. The WFAA (Volume 7.3) [REP2-009] is clear that there is sufficient residual waste to serve the Proposed Development. Residual waste is waste that is left over after recycled waste or waste that could be reused is removed.</p> <p>The Proposed Development is consistent with the core environmental objective. ES Chapter 14 Climate (Volume 6.2) [APP-041] assesses the GHG emissions that would be generated by its construction, operation and decommissioning and concludes that it is consistent with the UK's carbon fourth, fifth and sixth carbon budgets.</p>



Topic	Representation reference	Summary of Representation
Planning Statement	Appendix 1: Comments on Planning Statement	The National Planning Policy for Waste also references that:

In 2050 when the UK net carbon budget is zero (and the Climate Change Committee state that waste sector emissions can be reduced by 75% from today's levels), the Proposed Development will also have a beneficial impact.

The Applicant has prepared an Environmental Impact Assessment which considers the potential for significant effects upon the environment. The conclusions from this assessment are taken forward in the Planning Statement and considered against relevant planning policy. The conclusion reached is that the planning balance is in favour of consenting the Proposed Development. For the reasons set out above, the Proposed Development will mitigate climate change. Furthermore, it will use natural resources prudently. Its use of water for example demonstrates efficiency through the recycling of condensate, whilst grey water recycling will be adopted for the Administration Building.

The design of the Proposed Development minimises waste. The EfW CHP Facility Site is predominantly brownfield, materials currently on site will be recycled and used to create the construction platforms minimising the importation of new fill materials. The Proposed Development minimises waste water (as set out above). Pollution will be controlled via a series of embedded environmental measures and through the implementation of management plans such as the **Outline CEMP (Volume 7.12) (Rev 3)** and **Outline Odour Management Plan (Volume 7.11) [REP1-021]**.

The **Design and Access Statement (Volume 7.5) [APP-096]** sets out the Applicant's approach to the design of the Proposed Development, including its design evolution



Topic	Representation reference	Summary of Representation
	4.3 Other Relevant National Policy	<p>7. <i>When determining waste planning applications, waste planning authorities should: [...]</i></p> <ul style="list-style-type: none"> <i>recognise that proposals for waste management facilities such as incinerators that cut across up-to-date Local Plans reflecting the vision and aspiration of local communities can give rise to justifiable frustration, and expect applicants to demonstrate that waste disposal facilities not in line with the Local Plan, will not undermine the objectives of the Local Plan through prejudicing movement up the waste hierarchy;</i> <p>This is an important issue for this proposal, given its very clear potential to prejudice movement up the waste hierarchy (not least, through what is not considered in the Proposed Development),</p>
		<p>consistent with NPS EN-1 paragraph 4.5.4. It identifies the measures taken by the Applicant to reduce resource use, for example the greywater recycling and solar panels to the Administration Building and the Applicant's commitment to BREEAM 'Excellent (Administration Building) and Very Good (EfW CHP Facility).</p> <p>The Applicant does not agree that the Proposed Development is contrary to or would undermine the objectives of the relevant local plan, which for the EfW CHP Site itself is the Cambridgeshire and Peterborough Minerals and Waste Local Plan 2021. Policy 3(a) is clear that proposals will be, in principle, supported if any of three scenarios apply. Scenario (c) is that the proposal would move <i>waste capacity already identified in the above table up the waste hierarchy.</i></p> <p>Cambridgeshire currently landfills around 220,000 tonnes of waste per annum which is suitable for treatment at the Proposed Development. The Proposed Development would move the treatment of this waste up the waste hierarchy.</p>
Planning Statement	Appendix 1: Comments on Planning Statement	<p><u>Other Relevant National Plans and Policies</u></p> <p>Reference is made to the 25 Year Environment Plan; What this does not say is that residual waste should be maximised, which would be inconsistent with the application of the waste hierarchy. Properly understood, it indicates a desire to recover as much energy as possible from whatever remains to be incinerated, consistent with the hierarchy.</p> <p>In 2022, BEIS consulted on the expansion of the UK-ETS to include energy from waste incineration. This includes for the</p>
	4.4 Other Relevant National Plans and Policies	<p>The Applicant agrees that the 25 Year Environment Plan indicates a desire to recover as much energy from residual waste as possible in order to move treatment of this waste up the waste hierarchy. That is the purpose of the Proposed Development. As noted above, Cambridgeshire currently landfills around 220,000 tonnes of waste per annum which is suitable for treatment at the Proposed Development.</p> <p>The Proposed Development includes for a CHP Connection to supply local businesses. The Applicant has also included two requirements relating to carbon capture</p>



Topic	Representation reference	Summary of Representation	
		<p>consideration of a carbon tax aimed at curbing rising emissions from EfW and that the ETS may incentivise plants to supply heat or by incentivising recovery in a way which reduce overall carbon emissions. It could also incentivise carbon capture and storage.</p> <p>It is suggested by the author that “there is growing recognition of the fact that EfW is becoming problematic as a growing source of GHG emissions from the (otherwise) decarbonising power sector”.</p>	<p>readiness within the draft DCO (Volume 3.1) [REP1-007].</p> <p>With regard to EfW as ‘a growing source of GHG emissions’, the Proposed Development would reduce emission over the landfill alternative. The Applicant is further committed to reducing GHG emissions through consideration to be given to the use of carbon capture. The Applicant has set aside land for carbon capture and included within the Draft DCO (Volume 3.1) [REP1-007] submitted at Deadline 1 Requirement 23 Carbon Capture Readiness report which requires it to continue to investigate and report upon the feasibility of carbon capture.</p>
Planning Statement	<p>Appendix 1: Comments on Planning Statement</p> <p>4.5 Summary at Close of Section 3 of Planning Statement</p>	<p>1: The proposed development will not decarbonise the economy, on the contrary it will increase the average carbon intensity of power generation, being roughly double the carbon intensity of gas and more than six times the average carbon intensity of the grid by the time the facility is planned to be operational (in late 2026).</p>	<p>ES Chapter 14 Climate (Volume 7.3) [APP-041] assesses the GHG emissions that would be generated by its construction, operation and decommissioning and concludes that it is consistent with the UK's carbon fourth, fifth and sixth carbon budget. In 2050 when the UK net carbon budget is zero (and the Climate Change Committee state that waste sector emissions can be reduced by 75% from today's levels), the Proposed Development will also have a beneficial impact relative to the alternative of landfilling residual waste.</p>
Planning Statement	<p>Appendix 1: Comments on Planning Statement</p> <p>4.5 Summary at Close of Section 3 of Planning Statement</p>	<p>1: To meet government carbon budgets there is a requirement for renewable energy not EfW.</p>	<p>The Proposed Development will lead to a reduction in carbon emissions over the alternative of landfilling residual waste. NSIP EfWs fall to be considered renewable energy under NPS EN-3 Renewable Energy.</p>



Topic	Representation reference	Summary of Representation	
Planning Statement	Appendix 1: Comments on Planning Statement 4.5 Summary at Close of Section 3 of Planning Statement	There are a number of other issues that the SoS should take into account in addition to the reference that the Government has demonstrated that there is a need for such energy infrastructure and that the SoS should start with a presumption in favour of granting consent. This includes the application of the waste hierarchy.	<p>Adopted national policy, NPS EN-1 paragraph 4.1.2 sets out the presumption in favour of granting consent for energy NSIPs. It goes on to state that this presumption applies unless any more specific and relevant policies set out in the relevant NPSs clearly indicate that consent should be refused. The presumption is also subject to the provisions of section 104 of the Planning Act 2008. The Planning Statement (Volume 7.1) [APP-091] considers the relevant policies set out with the NPSs and other matters including other national and local policy, and including the waste hierarchy, and concludes that the planning balance weighs in favour of the Proposed Development.</p> <p>Requirement 14 in Schedule 2 of the Draft Development Consent Order (Volume 3.1) (Revision 3 has been produced at Deadline 3) confirms that a scheme must be submitted to the relevant planning authority that sets out how the Applicant will maintain the waste hierarchy and minimise the receipt of recyclable and reusable waste at the EfW CHP Facility.</p>
Planning Statement	Appendix 1: Comments on Planning Statement 4.5 Summary at Close of Section 3 of Planning Statement.	Reference to infrastructure investment being a key pillar underpinning the Government's wider economic policies and objectives is overstated in respect of the Proposed Development.	The Proposed Development represents an infrastructure investment of some £450m, see Funding Statement (Volume 4.2) [APP-014] .



Topic	Representation reference	Summary of Representation	
Planning Statement	Appendix 1: Comments on Planning Statement 4.5 Summary at Close of Section 3 of Planning Statement	1: It is not clear that the Proposed Development complies with the waste hierarchy.	The WFAA (Volume 7.3) [REP2-009] demonstrates that the Proposed Development is compliant with the waste hierarchy.
Planning Statement	Appendix 1: Comments on Planning Statement 4.5 Summary at Close of Section 3 of Planning Statement	1: The Government does not 'encourage energy recovery from waste'. Energy recovery from waste sits on the next to bottom rung on the hierarchy. Government has regulated to halve residual waste by 2042. That is not consistent with 'encouraging' energy recovery from waste in the aggregate.	Government encourages moving the treatment of waste up the waste hierarchy and in this context recognises that energy recovery has a role to play. As noted above in the context of the 25 Year Environment Plan, there is desire to recover as much energy as possible from whatever remains to be incinerated, Residual waste that is currently landfilled if treated at a EfW Facility is moved up with waste hierarchy consistent with government policy. The WFAA (Volume 7.3) [REP2-009] takes into account government aims to increase recycling and reduce the amounts of residual waste.
Planning Statement	Appendix 1: Comments on Planning Statement 4.5 Summary at Close of Section 3 of Planning Statement	1: Good design does not extend merely to being configured for the possibility of providing CHP. Good design ought to reflect the waste hierarchy, and the architecture of the facility should also be such as to be visually attractive.	The WFAA (Volume 7.3) [REP2-009] demonstrates that the Proposed Development is compliant with the waste hierarchy. The evolution of the design of the Proposed development including its architectural treatment is described within the Design and Access Statement (Volume 7.6) [APP-095] .
Planning Statement	Appendix 1: Comments on Planning Statement	1: That operational GHG emissions are not reasons to prohibit the consenting of energy projects and the SoS does not need to assess individual applications for planning consent against operational carbon emissions and their contribution	NPS EN-1 paragraph 5.2.2 provides this statement and as such it is government policy. The movement in the treatment of waste up the waste hierarchy and away from landfill will reduce carbon emissions.



Topic	Representation reference	Summary of Representation
4.5 Summary at Close of Section 3 of Planning Statement	to carbon budgets, net zero and the UK's international climate commitments is a moot point. The SoS might reasonably consider this a relevant matter, not least if such impacts are considered relevant in interpreting the priority ordering in the waste hierarchy.	<p>Additionally, the WFAA (Volume 7.3) [REP2-009] has considered the implications of achieving the Government's Environmental Improvement Plan's (EIP) longer term 'stretch' target of halving residual waste produced per person by 2042 (equating to no more than 287kg per capita).</p> <p>In this regard, the updated WFAA (Volume 7.3) [REP2-009] notes that a fundamental factor is that the EIP neither includes a clear strategy nor puts the required funding in place to set out how a halving of residual waste by 2042 will be achieved - especially given the stagnating municipal recycling rates discussed at length in the assessment. Notwithstanding this, the updated WFAA (Volume 7.3) [REP2-009] has sought to understand the 'need case' for the capacity offered by the Proposed Development in the event of such an aspirational target being achieved.</p> <p>Current Office for National Statistics (ONS) population predictions are that in 2043, there will be approximately 61,744,098 people in England – and at 287kg of residual waste per head, this equates to 17.72 million tonnes of residual waste. Whilst current operational and 'in construction' EfW capacity equates to 19.4 million tonnes (as predicted by Tolvik in 2022), inevitably by 2042, a large proportion of the existing capacity will be decommissioned and/or require upgrading – particularly the older/ smaller non-R1 compliant facilities. With this in mind, it is considered that even in the unlikely event of the EIP stretch target of halving residual waste by 2042 being achieved, there remains a clear need for the capacity offered by the Proposed Development.</p>



Topic	Representation reference	Summary of Representation	
Planning Statement	Appendix 1: Responses from Cambridge County Council appear to indicate that this site was intended for operations higher in the hierarchy: one of the current occupants of the site appears to be a recycling business. 4.5 Summary at Close of Section 3 of Planning Statement		Please see response above. The adopted Cambridgeshire Minerals and Waste Local Plan 2021 does not allocate sites. However, it identifies the majority of the EfW CHP Facility Site as a waste management area. Local Plan Policy 10 states that waste management areas identify committed waste management facilities that make a significant contribution to managing any waste stream and the waste management proposals within WMAs are to be considered against Policy 4. The Applicant is firmly of the opinion that the Proposed Development is consistent with Policy 4.
Planning Statement	Appendix 1: It cannot be the case that 'need' for energy justifies casting all other government policy aside, notably that regarding waste. 4.5 Summary at Close of Section 3 of Planning Statement		The Planning Statement (Volume 7.1) [APP-091] demonstrates the need for the Proposed Development which includes the UK requirement for energy. It also demonstrates that there is a need to reduce the amount of waste going to landfill, the need to reduce carbon emissions and other benefits arising from it.
Planning Statement	Appendix 1: The power generated is rather carbon intense, and offers no support to achieving climate change commitments and carbon budgets. 4.5 Summary at Close of Section 3 of Planning Statement		As above. ES Chapter 14 Climate (Volume 6.2) [APP-041] assesses the GHG emissions that would be generated by its construction, operation and decommissioning and concludes that it is consistent with the UK's carbon fourth, fifth and sixth carbon budget. In 2050 when the UK net carbon budget is zero (and the Climate Change Committee state that waste sector emissions can be reduced by 75% from today's levels), the Proposed Development will also have a beneficial impact relative to the alternative of landfilling residual waste. The Applicant considers that displacement of electricity generation using conventional fossil fuels is the



Topic	Representation reference	Summary of Representation
		most likely scenario for the EfW CHP Facility rather than comparison with a future grid average.
Planning Statement	Appendix 1: Comments on Planning Statement 4.5 Summary at Close of Section 3 of Planning Statement	<p>The design of the CHP Connection, and the attractiveness to potential consumers is questioned.</p> <p>The Proposed CHP Connection would run along the line of the Disused March to Wisbech Railway. Whilst some existing vegetation would be lost, some would remain and this would provide some visual screening when viewed from the adjoining industrial estate. At the point at which it would run behind residential properties the use of expansion loops has been replaced by bellows. This reduces the height of the proposed connection in these locations. The point raised regarding the 40 year lifespan has responded to in relation to Appendix 1: 3.0 Section 2: Proposed Development above.</p> <p>The local businesses are expected to respond positively to the offer of heat on the basis that it will be provided at a competitive price. The use of heat (steam) from the EfW CHP Facility will mean that they do not need to burn natural gas to create their own heat.</p>
Planning Statement	Appendix 1: Comments on Planning Statement 4.5 Summary at Close of Section 3 of Planning Statement	<p>Professionalism and objectivity of the WFAA is challenged.</p> <p>The Applicant strongly disagrees with this contention. The WFAA (Volume 7.3) [APP-009] is a robust, transparent document that has been based on up to date, publicly available data, including evidence bases that underpin Waste Local Plans, which have been the subject of rigorous examination. Furthermore, the WFAA (Volume 7.3) [APP-009] has been conducted professionally and objectively and provides a robust analysis. The Applicant has further updated the WFAA for Deadline 2 (Volume 7.3) [REP2-009]. This demonstrates that there is a viable market for the Proposed Development throughout its planned operational lifespan.</p>



Topic	Representation reference	Summary of Representation	
Planning Statement	Appendix 1: Comments on Planning Statement 4.5 Summary at Close of Section 3 of Planning Statement	The Proposed Development does not reduce carbon emissions.	Please see response above with reference to the conclusions within ES Chapter 14 Climate (Volume 6.2) [APP-041] .
Planning Statement	Appendix 1: Comments on Planning Statement 4.5 Summary at Close of Section 3 of Planning Statement	The proposal offers limited benefits yet creates significant impacts in respect of climate change and air pollution.	The Planning Statement (Volume 7.1) [APP-091] establishes the project benefits and considers the environmental impact of the Proposed Development with impacts limited to certain areas. It concludes that the planning balance weighs in favour of consenting the Proposed Development. The Applicant has also prepared a Project Benefits Report (Volume 7.4) [APP-095] that provides more detail on the benefits that would accrue.
Waste Fuel Availability Assessment	Main Report Section 6.0 Need for the Facility	Section 6 of the Written Representation provides commentary on the Applicant's Waste Fuel Availability Assessment (Volume 7.3) [REP2-009] and asserts the author's opinion that it does not support the need for the Proposed Development.	Detailed commentary to the points raised in Appendix 2 of the response are set out below. In terms of the overarching comments made in the main body of the response, the Applicant's comments are as follows: <ol style="list-style-type: none"> 1. Full justification for the Study Area is set out in sections 3.2.2 to 3.2.14 of the updated WFAA (Volume 7.3) [REP2-009] submitted at Deadline 2. The defined Study Area is not arbitrary. 2. The WFAA (Volume 7.3) [REP2-009] has considered the implications of achieving the Government's Environmental Improvement Plan's (EIP) longer term 'stretch' target of halving residual waste produced per person by 2042 (equating to no more than 287kg per capita). In this regard, the updated WFAA (Volume 7.3)



Topic	Representation reference	Summary of Representation
		<p>[REP2-009] notes that a fundamental factor is that the EIP neither includes a clear strategy nor puts the required funding in place to set out how a halving of residual waste by 2042 will be achieved - especially given the stagnating municipal recycling rates discussed at length in the assessment. Notwithstanding this, the updated WFAA (Volume 7.3) [REP2-009] has considered the need for the capacity offered by the Proposed Development in the event of such an aspirational target being achieved. Current Office for National Statistics (ONS) population predictions are that in 2043, there will be approximately 61,744,098 people in England – and at 287kg of residual waste per head,(as defined by the Government’s long-term target set out on page 147 of the Government’s Environmental Improvement Plan 2023) this equates to 17.72 million tonnes of residual waste. Whilst current operational and ‘in construction’ EfW capacity equates to 19.4 million tonnes (as predicted by Tolvik in 2022), inevitably by 2042, a large proportion of the existing capacity will be decommissioned and/or require upgrading – particularly the older/ smaller non-R1 compliant facilities. With this in mind, it is considered that even in the unlikely event of the EIP stretch target of halving residual waste by 2042 being achieved, there remains a clear need for the capacity offered by the Proposed Development.</p> <p>3. The ordering of the assessments in the WFAA (Volume 7.3) [REP2-009] has been presented to reflect the provisions of paragraph 2.5.66 of National Policy Statement for Renewable Energy</p>



Topic	Representation reference	Summary of Representation
		<p>Infrastructure (EN-3), which <i>requires that applicants prepare “an assessment that examines the conformity of the scheme with the waste hierarchy and the effect of the scheme on the relevant waste plan or plans where a proposal is likely to involve more than one local authority”</i>. Extant national policy refers only to assessment at a localised level – the need for national assessment is introduced by the revised draft NPS EN-3, which states that a new EfW must not result in over capacity of EfW waste at a national or local level (paragraph 3.7.7). Given the consultation status of this guidance, the WFAA (Volume 7.3) [REP2-009] has presented the requirements of extant guidance first i.e., the localised assessment, followed by the potential requirements of the draft, emerging policy i.e. national assessment. Furthermore, the ordering of the assessment reflects the proximity principle i.e., the need to manage waste as close as possible to its point of arising.</p> <p>4. The data set out by the respondent is noted and acknowledged as being derived from Table 2 of the May 2022 Tolvik Report – although total permitted capacity in the UK at December 2021 is recorded in Table 2 of the Tolvik report as 21.67 million tonnes. However, as acknowledged by the May 2022 Tolvik Report at Section 7 “<i>Permit Capacity is not suitable for projecting future EfW capacity in any analysis of the UK Residual Waste market – as EfWs generally do not operate at this level. “Operational Capacity” is a more appropriate measure; it is estimated (based upon</i></p>



Topic	Representation reference	Summary of Representation
		<p><i>the EfWs listed in Appendix 1, that by 2026 the UK Operational Capacity will be 19.4Mtpa.”</i></p> <p>An updated version of the WFAA (Volume 7.3) [REP2-009] has been produced and submitted at Deadline 2 which reflects the May 2022 Tolvik Report and importantly, the 19.4 million tonnes per annum capacity figure. The updated WFAA concludes that with a municipal recycling rate of 55-60%, future baseline levels of HIC residual waste are estimated to be between 21.0 and 24.5 million tonnes by 2030 – thereby resulting in a shortfall of capacity of between 1.6 and 5.1 million tonnes per annum.</p> <p>The adoption of these recycling scenarios also sits well with the provisions of the recently published Environmental Improvement Plan (EIP) 2023, which seeks the total mass of residual waste not exceeding 25.5 million tonnes by the beginning of 2028. As such, even if residual waste reduction targets are achieved, there remains a minimum national capacity shortfall of 1.6 million tonnes.</p>
Waste Fuel Availability Assessment	Appendix 2: Comments on the WFAA Summary	<p>It would, in our view, be more logical to consider the national picture first (to check whether any additional EfW capacity is warranted) and then – if there is a capacity need - consider whether such a need exists locally. The Applicant follows the reverse approach, and in doing so, draws an arbitrary and artificial boundary within which to conduct its hunt for a means to justify 630,000 tonnes of additional EfW capacity.</p> <p>The analysis is, generally, backward looking, and is frequently based on data which are not up to date (the local data relate to the year 2019). Given the difficulty in</p> <p>The ordering of the assessments in the WFAA (Volume 7.3) [REP2-009] has been presented to reflect the provisions of paragraph 2.5.66 (page 22) of National Policy Statement for Renewable Energy Infrastructure (EN-3), which <i>requires that applicants prepare “an assessment that examines the conformity of the scheme with the waste hierarchy and the effect of the scheme on the relevant waste plan or plans where a proposal is likely to involve more than one local authority”</i>. Extant national policy refers only to assessment at a localised level – the need for national assessment is introduced by the revised</p>



Topic	Representation reference	Summary of Representation
		<p>generating quality data in this area, use of landfill tax returns might have been considered a relevant approach.</p> <p>draft NPS EN-3, which states that a new EfW must not result in over capacity of EfW waste at a national or local level (paragraph 3.7.7). Given the emerging status of this guidance, the WFAA (Volume 7.3) [REP2-009] has presented the requirements of extant guidance first i.e., the localised assessment, followed by the potential requirements of the draft, emerging policy i.e., national assessment. Furthermore, the ordering of the assessment reflects the proximity principle i.e., the need to manage waste as close as possible to its point of arising.</p> <p>In addition to this, the WFAA (Volume 7.3) [APP-009] is a robust, transparent document that has been based on up to date, publicly available data, including evidence bases that underpin Waste Local Plans, which have been the subject of rigorous examination. The national data sources used are Government collated data sets (DEFRA and Environment Agency data), which have been prepared to specifically assist Waste Planning Authorities and others with the identification of potential future waste management needs. The data sets relied upon are informed by data collected from various sources, including landfill tax returns.</p>
Waste Fuel Availability Assessment	Appendix 2: Comments on the WFAA Summary	<p>Paragraph 5.1.16 of the WFAA suggests that of 27.5 million tonnes of residual waste in 2019, 12.63 million tonnes were incinerated, and 2.8 million tonnes were exported as RDF, leaving 12.07 million tonnes being landfilled. The figure for the quantity incinerated rose to 13.96 million tonnes in 2020, whilst the amount exported as RDF fell to 1.9 million tonnes, leaving 10.94 million tonnes being landfilled. However, the following table indicates that capacity for incineration and co-incineration either operational, commissioned, or in construction, excluding any export of RDF, was 21.450</p> <p>The data set out by the respondent is noted and acknowledged as being derived from Table 2 of the May 2022 Tolvik Report – although total permitted capacity in the UK at December 2021 is recorded in Table 2 of the Tolvik report as 21.67 million tonnes.</p> <p>However, as acknowledged by the May 2022 Tolvik Report at Section 7 <i>“Permit Capacity is not suitable for projecting future EfW capacity in any analysis of the UK Residual Waste market – as EfWs generally do not operate at this</i></p>



Topic	Representation reference	Summary of Representation																		
		<p>million tonnes in the UK, and 18.908 million tonnes in England.</p> <p>Table 3: EfW Capacity in Operation, Commissioning and Construction, 2021</p> <table border="1" data-bbox="636 475 1310 647"> <thead> <tr> <th></th> <th>UK</th> <th>England</th> </tr> </thead> <tbody> <tr> <td>Operating Capacity (2021)</td> <td>16.370</td> <td>14.870</td> </tr> <tr> <td>In Commissioning</td> <td>0.940</td> <td>0.940</td> </tr> <tr> <td>In Construction</td> <td>3.745</td> <td>2.703</td> </tr> <tr> <td>Co-incineration (cement / lime kilns)</td> <td>0.375</td> <td>0.375</td> </tr> <tr> <td>Total</td> <td>21.450</td> <td>18.908</td> </tr> </tbody> </table> <p><small>Source: based on data in Tolvik (2022) UK Energy from Waste Statistics - 2021, May 2022.</small></p> <p>It seems increasingly likely that if – as Defra indicates – changes already in the pipeline lead to a reduction in residual waste of the order 30%, then consenting this facility will indeed lead to overcapacity for incineration. 19 We already have far more than 50% of the 2019 quantity of residual waste being sent to EfW. The government has a target to halve residual waste by 2042. It is anticipating a significant drop (of around 30%) more or less by the time the Proposed Development would become operational. There is no benefit to consenting this Proposed Development. In light of the Regulations now seeking to halve residual waste from 2019 levels by 2042, this suggests that no more EfW is needed, and that England and the UK are already approaching excess capacity</p>		UK	England	Operating Capacity (2021)	16.370	14.870	In Commissioning	0.940	0.940	In Construction	3.745	2.703	Co-incineration (cement / lime kilns)	0.375	0.375	Total	21.450	18.908
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<p>Waste Fuel Availability Assessment</p>	<p>Appendix 2: Comments on the WFAA</p> <p>Section 1.0 Comments on the Waste Fuel</p>	<p>Whilst the methodology for the WFAA is to start local and then take a broader view, logic, and the reality of waste movements, would suggest the opposite as the logical approach. If there is – because of the choice of the spatial area being investigated – an apparent local lack of capacity, but excess capacity at the national level, then building more capacity locally will simply worsen the problem of over-</p>																		
		<p>level. “Operational Capacity” is a more appropriate measure; it is estimated (based upon the EfWs listed in Appendix 1, that by 2026 the UK Operational Capacity will be 19.4Mtpa.”</p> <p>An updated version of the WFAA (Volume 7.3) [REP2-009] has been produced which reflects the May 2022 Tolvik Report and importantly, the 19.4 million tonnes per annum capacity figure. The updated WFAA concludes that with a municipal recycling rate of 55-60%, future baseline levels of HIC residual waste are estimated to be between 21.0 and 24.5 million tonnes by 2030 – thereby resulting in a shortfall of capacity of between 1.6 and 5.1 million tonnes per annum.</p> <p>The adoption of these recycling scenarios also sits well with the provisions of the recently published Environmental Improvement Plan (EIP) 2023, which seeks the total mass of residual waste not exceeding 25.5 million tonnes by the beginning of 2028. As such, even if residual waste reduction targets are achieved, there remains a minimum national capacity shortfall of 1.6 million tonnes.</p> <p>Noted. However, the assertion that there is excess national EfW capacity. The updated WFAA (Volume 7.3) [REP2-009] concludes that at a national level:</p> <ul style="list-style-type: none"> In 2021, ~9.95 million tonnes of residual HIC waste was disposed of to landfill, and 1.7 million 																		



Topic	Representation reference	Summary of Representation
Availability Assessment	Availability Assessment	<p>capacity at the national level. All that would happen is that the extent of under-utilised capacity would increase, with the likely effect that prices would fall, and with the possible consequence that waste otherwise being recycled is then diverted into EfW. This is, indeed, what has happened in other countries in the past.</p>
Waste Fuel Availability Assessment	Appendix 2: Comments on the WFAA	<p>The spatially circumscribed part of the WFAA is irrelevant if there is excess capacity at the national level.</p>
	Section 1.0 Comments on the Waste Fuel	

tonnes was exported as refuse derived fuel (RDF) to Europe and beyond; and

- 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 ~1.6 million tonnes of residual HIC capacity in the UK** (rising to over 5 million tonnes if the Government's recycling target is undershot by 5%).

Additionally, the focus of the **WFAA (Volume 7.3) [REP2-009]** is on the diversion of potentially suitable residual waste from being managed at the bottom of the waste hierarchy i.e., landfill. Indeed, it is not the expectation that the Proposed Development would divert waste from any other means of management apart from landfill or exportation (which are both covered in some detail in the **WFAA (Volume 7.3) [REP2-009]**).

In this context, it is concluded that the Proposed Development could offer up to 625,600 tonnes per annum of much needed national EfW residual waste management capacity.

Please see the previous response.



Topic	Representation reference	Summary of Representation
	Availability Assessment (page 2)	
Waste Fuel Availability Assessment	Appendix 2: Comments on the WFAA Section 1.0 Comments on the Waste Fuel Availability Assessment (page 2)	I think it unlikely that, especially given the way in which markets for RDF expert [<i>sic</i>] have developed over the last decade and more, that the above choice [<i>Study Area</i>] is based on sensible 'professional judgement'. If so, it would be useful to understand who the professional is that made this judgement. It is true, of course, that moving waste costs money, and the further it is transported, the more the transport (other things being equal – and they often are not) costs. If the cost differential justifies it, though, the waste may well move this and greater distances. Professional judgement on the Study Area has been made by the Applicant's team, who collectively have several decades experience in all technical, commercial, planning and environmental matters associated with the successful delivery of waste management infrastructure. The recognition from the respondent that cost differentials may well result in the movement of waste across greater distances is noted and welcomed.
Waste Fuel Availability Assessment	Appendix 2: Comments on the WFAA Section 1.0 Comments on the Waste Fuel Availability Assessment (page 2)	It would be useful to know where the Applicant plans to send any air pollution control residues: will this be within a two-hour transport distance? The Applicant's response to the ExA's Written Questions (ExQ1) – Appendix 10.2B Technical Note – IBA and APCr Sites and Capacity (Volume 10.2) [REP2-019] summarises the IBA treatment facilities and APCr treatment/disposal facilities that would support the Proposed Development. Many of the identified sites are within a two hour transport distance from the Proposed Development.
Waste Fuel Availability Assessment	Appendix 2: Comments on the WFAA Section 1.0 Comments on the Waste Fuel Availability	Virtually all the national sources highlighted in para 3.3.11 are outdated and many have been superseded. Given how poor data outside the 'local authority collected waste' are, it would also have been logical to triangulate the figures using landfill tax data: the merit of such data is that they are linked to financial transactions, and HMRC has powers of entry to check for fraudulent declarations made by operators. An updated version of the WFAA (Volume 7.3) [REP2-009] has been produced which relies upon the following updated data sources: <ul style="list-style-type: none"> • <i>UK Statistics on Waste</i>, Defra (published May 2022 update); • <i>UK Energy from Waste Statistics - 2021</i>, Tolvik Consulting Ltd (May 2022); • <i>UK Residual Waste: 2030 Market Review</i>, produced by Tolvik Consulting Ltd on behalf of the



Topic	Representation reference	Summary of Representation
	Assessment (page 2)	<p>Environmental Services Association (November 2017); and</p> <ul style="list-style-type: none"> • <i>Overview of Statistics for RDF Export from England</i>, Footprint Services (November 2022). <p>Reference to the data set out in the HMRC Environmental Taxes Bulletin is noted. However, no further analysis of this data has been carried out by the Applicant because the data appears to be only presented on a 'global' England & Northern Ireland basis. As such, no analysis at either a national (England) level or a regional/ local level is possible.</p>
Waste Fuel Availability Assessment	<p>Appendix 2: Comments on the WFAA</p> <p>Section 1.0 Fuel Availability Assessment (page 4)</p>	<p>A report by Tolvik from May 2022 (a further version of the report cited in the WFAA) indicated the capacity of existing operational EfW facilities for the whole of the UK of 16.37 million tonnes, with 14.85 million tonnes actually processed in 2021. Of the UK capacity, 1.5 million tonnes were outside England. A further 0.94 million tonnes were in commissioning at the time (all in England). Facilities in construction in the UK accounted for a further 4.365 million tonnes capacity, though 0.7 million tonnes capacity was the replacement of the Edmonton facility (the capacity is 0.08 million tonnes greater than the facility it replaces). Of this England accounted for a further 3.323 million tonnes, or 2.703 million tonnes accounting for the retirement of 620kt at Edmonton in London.</p> <p>The data set out by the respondent is noted and acknowledged as being derived from Table 2 of the May 2022 Tolvik Report – although total permitted capacity in the UK at December 2021 is recorded in Table 2 of the Tolvik report as 21.67 million tonnes. However, as acknowledged by the May 2022 Tolvik Report at Section 7 “Permit Capacity is not suitable for projecting future EfW capacity in any analysis of the UK Residual Waste market – as EfWs generally do not operate at this level. “Operational Capacity” is a more appropriate measure; it is estimated (based upon the EfWs listed in Appendix 1, that by 2026 the UK Operational Capacity will be 19.4Mtpa.”</p> <p>An updated version of the WFAA (Volume 7.3) [REP2-009] has been produced and submitted at Deadline 2 which reflects the May 2022 Tolvik Report and importantly, the 19.4 million tonnes per annum capacity figure. The updated WFAA concludes that with a municipal recycling rate of 55-60%, future baseline levels of HIC residual waste are estimated to be between 21.0</p>



Topic	Representation reference	Summary of Representation
		<p>and 24.5 million tonnes by 2030 – thereby resulting in a shortfall of capacity of between 1.6 and 5.1 million tonnes per annum.</p> <p>The adoption of these recycling scenarios also sits well with the provisions of the recently published Environmental Improvement Plan (EIP) 2023, which seeks the total mass of residual waste not exceeding 25.5 million tonnes by the beginning of 2028. As such, even if residual waste reduction targets are achieved, there remains a minimum national capacity shortfall of 1.6 million tonnes.</p>
Waste Fuel Availability Assessment	<p>Appendix 2: Comments on the WFAA</p> <p>Section 1.0 Comments on the Waste Fuel Availability Assessment (page 4)</p>	<p>We are not clear how, based on the description of sources in Table 3.2, how the data in Table 4.4 have been derived with the associated EWC Codes. The methodology for doing so is unclear.</p> <p>The data set out in Table 4.4 of the WFAA (Volume 7.3) [REP2-009] has been derived from the Waste Data Interrogator (2021) and is based on 'waste received' at permitted non-hazardous landfill sites within England, with the origin of the defined WPA.</p>
	<p>Appendix 2: Comments on the WFAA</p> <p>Section 1.0 Comments on the Waste Fuel Availability Assessment (page 5)</p>	<p>The WFAA states: <i>4.1.10 The data provides clear evidence that substantial quantities of potentially suitable material within the spatial scope of this WFAA are currently being disposed of to landfill – almost 2.4 million tonnes.</i> “</p> <p>The word 'currently' is not applicable, and the data does not provide evidence that is 'clear'. The story would be far more compelling if the study provided a clear mass balance for all the waste codes concerned, mapping the 17.9 million tonnes supposedly generated in 2019 to the 2.4 million</p> <p>The Applicant considers that the WFAA (Volume 7.3) [REP2-009] provides a clear and robust case of need – and one which is based upon a range of relevant, publicly available, credible and rigorously examined data sources, which are as up to date as possible.</p> <p>The focus of the assessment is on the diversion of potentially suitable residual waste from being managed at the bottom of the waste hierarchy i.e., landfill. It is unclear what benefit would be gained from understanding the fate of all potentially suitable HIC arisings within the Study</p>



Topic	Representation reference	Summary of Representation
		tonnes sent to non-hazardous landfill. Has the fate of the other 15.5 million tonnes been understood?
Waste Fuel Availability Assessment	Appendix 2: Comments on the WFAA Section 1.0 Comments on the Waste Fuel Availability Assessment (page 5)	<p>The statement at 4.1.14 also needs qualification regarding what is and is not 'current'.</p> <p>Paragraph 4.1.14 of the updated WFAA (Volume 7.3) [REP2-009] states:</p> <p>"It can therefore be concluded that based upon the current pattern of waste arising and management across the spatial scope of this assessment, there is potential for almost 2.6 million tonnes of suitable HIC waste that is currently sent to landfill (2.4 million tonnes) and/or exported as RDF (0.2million tonnes) which could be managed further up the waste hierarchy and/or at a location that is more proximate to the point of arising."</p> <p>Section 3.4 of the WFAA (Volume 7.3) [REP2-009] states that the baseline year for the assessment is 2021. Any reference to current in the document is therefore based upon 2021.</p>
Waste Fuel Availability Assessment	Appendix 2: Comments on the WFAA Section 1.0 Comments on the Waste Fuel Availability Assessment (page 5)	<p>Section 4.2 is now somewhat outdated, taking into account the Government's new target to halve residual waste.</p> <p>The assessment has been based upon up to date available waste data, but also rigorously examined data that underpins extant Development Plans. The updated WFAA (Volume 7.3) [REP2-009] has considered the Government's aspirations in relation to residual waste, as well as look at future needs as presented by extant statutory development plans. In both regards, a need for additional residual waste management capacity has been identified.</p>



Topic	Representation reference	Summary of Representation
Waste Fuel Availability Assessment	Appendix 2: Comments on the WFAA Section 1.0 Comments on the Waste Fuel Availability Assessment (page 6)	<p>The more recent Tolvik report for 2021 indicates (see Table 1) that capacity for incineration and co-incineration either operational, commissioned, or in construction, excluding any export of RDF, was 21.450 million tonnes in the UK, and 18.908 million tonnes in England. It seems increasingly likely that if – as Defra indicates (see Figure 1) – changes already in the pipeline lead to a reduction in residual waste of the order 30%, then consenting this facility will indeed lead to overcapacity for incineration. We already have far more than 50% of the 2019 quantity of residual waste being sent to EfW. The government has a target to halve residual waste by 2042. It is anticipating a significant drop (of around 30%) more or less by the time the Proposed Development would become operational. There is no benefit to consenting this Proposed Development. In light of the Act now seeking to halve residual waste from 2019 levels by 2042, this suggests that no more EfW is needed and that England and the UK are already approaching excess capacity.</p> <p>The data set out by the respondent is noted and acknowledged as being derived from Table 2 of the May 2022 Tolvik Report – although total permitted capacity in the UK at December 2021 is recorded in Table 2 of the Tolvik report as 21.67 million tonnes. However, as acknowledged by the May 2022 Tolvik Report at Section 7 <i>“Permit Capacity is not suitable for projecting future EfW capacity in any analysis of the UK Residual Waste market – as EfWs generally do not operate at this level. “Operational Capacity” is a more appropriate measure; it is estimated (based upon the EfWs listed in Appendix 1, that by 2026 the UK Operational Capacity will be 19.4Mtpa.”</i></p> <p>An updated version of the WFAA (Volume 7.3) [REP2-009] has been produced and submitted at Deadline 2 which reflects the May 2022 Tolvik Report and importantly, the 19.4 million tonnes per annum capacity figure. The updated WFAA concludes that with a municipal recycling rate of 55-60%, future baseline levels of HIC residual waste are estimated to be between 21.0 and 24.5 million tonnes by 2030 – thereby resulting in a shortfall of capacity of between 1.6 and 5.1 million tonnes per annum.</p> <p>The adoption of these recycling scenarios also sits well with the provisions of the recently published Environmental Improvement Plan (EIP) 2023, which seeks the total mass of residual waste not exceeding 25.5 million tonnes by the beginning of 2028. As such, even if residual waste reduction targets are achieved, there remains a minimum national capacity shortfall of 1.6 million tonnes.</p>



Topic	Representation reference	Summary of Representation
Benefits of the Proposed Development	Main Report: Section 4.0 of the Assessment of Benefits of the Proposed Application	<p>Section 4 of the Written Representation challenges the proposed benefits that the Applicant has stated will occur as a result of the Proposed Development. This includes the contribution of the Proposed Development to the British Energy Security Strategy, the level of power generated, the carbon savings, and the potential uptake of CHP users.</p> <p>The Applicant maintains its conclusions with regard to the benefits of the Proposed Development. It can confirm that the Proposed Development will generate (net) 55MW of electricity and that this will support government policy as set out within the British Energy Security Strategy supporting a British energy system that is much more self-sufficient. ES Chapter 14 Climate (Volume 6.2) [APP-041] presents the carbon savings that will be delivered by the Proposed Development. The Applicant's project includes the construction and operation of a CHP Connection and the Applicant is of the opinion that local businesses will take the opportunity to source low carbon heat from the Proposed Development.</p>
Benefits of the Proposed Development	Main Report: Section 4.0 of the Assessment of Benefits of the Proposed Application (page 19)	<p>The Proposed Development will not make a significant contribution to the British Energy Security Strategy, including whether it can match for the intermittency of some renewables. It is unlikely the EfW CHP Facility will have a discernible effect on fuel / power imports.</p> <p>By virtue of the primary purpose of EfW – which is the treatment of waste – very few EfW facilities are 'turned on and off' to generate a quantity of power that is varied over time. Indeed, the Applicant claims 90% availability running at its design capacity. So, it is not a dispatchable source of power, whatever NPS EN-1 may have assumed EfW might be. The claim made for the facility is one that is not relevant to the Proposed Development.</p> <p>The Planning Statement (Volume 7.1) [APP-091] does not state that the Proposed Development will make a significant contribution to the British Energy Strategy. It will however contribute to the aims of the strategy which is to build an energy system that is more self-sufficient by generating electricity using a fuel source that is sourced domestically and not imported. NPS EN-1 paragraph 3.4.4 states that EfW can be used to generate 'dispatchable' power providing peak load and base load electricity on demand. The Applicant's EfW CHP Facility is not designed for intermittency, and this is recognised within the Project Benefits Report (Volume 7.4) [APP-095] which states that it will instead provide a baseload supply. Baseload is increasingly recognised as a means of ensuring that there remains sufficient electricity at times of low wind and/or days with low levels of sunlight, times when wind and solar farms produce lower levels of electricity.</p>



Topic	Representation reference	Summary of Representation
Benefits of the Proposed Development	Appendix 3: Comments on the Project Benefits Report	<p>The extent of the power proposed to be generated from the EfW CHP Facility is queried.</p> <p>The case for further EfW capacity in England is weak, and getting weaker by the day as facilities that have been consented move into the construction phase (as with the Rivenhall facility in Essex, which is one of many facilities that have escaped the attention of those conducting the WFAA).</p>
	Section 1.0 Comments on the Project Benefits Report	<p>The assertion that the Proposed Development may not produce 50 megawatts (MW) of electricity has been raised by other IPs and responded to by the Applicant. For example, see the Applicant's response to RR-296 (Volume 9.2) [REP1-031]. In summary, this response explains that the amount of residual waste to be processed at the EfW CHP Facility will generate in excess of 50MW of electricity.</p> <p>Standard methodologies and conversion factors have been used for determining GHG emissions for both the EfW CHP Facility Proposed Development case) and LFG (without Proposed Development case), which are set out in ES Chapter 14: Climate Change (Volume 6.2) [APP-041]. For both cases the relevance of the parameter 'MWh of power generated' is to determine the GHG emissions associated with an equivalent amount of power being supplied by UK Grid Average electricity generation, i.e. the GHG emissions avoided in both cases. As such, rather than the extent to which power would be generated by biogenic (renewable) or non-biogenic (fossil) sources in the waste, the relevant factor to consider in terms of avoided GHG emissions is the mix of energy sources used to generate UK Grid Average electricity, as reported by BEIS in DUKES (2021)⁵, which is the approach that has been used in the ES.</p> <p>It is also noted that the Applicant considers that the use of UK Grid Average electricity generation to determine avoided GHG emissions in the ES is a conservative approach and that displacement of electricity generation from conventional fossil fuels (i.e. from gas-fired power</p>

⁵ BEIS (2021). Digest of UK Energy Statistics (DUKES) 2021.



Topic	Representation reference	Summary of Representation
		<p>stations (CCGT)) is the most likely scenario for the EfW CHP Facility.</p> <p>In terms of the national case of need an updated version of the WFAA was produced at Deadline 2 – see WFAA (Volume 7.3) [REP2-009]. This provides a clear and robust case of need – and one which is based upon a range of up to date, publicly available, credible and rigorously examined data sources. This has continued to conclude that there is insufficient existing or planned residual waste management capacity to ensure that residual, 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). The WFAA (Rev 2) demonstrates that the project would not result in an overcapacity of waste management at either a local or a national level. Furthermore, the assessment includes consideration of all new and emerging EfW capacity, and it can be confirmed that capacity offered by the Rivenhall facility in Essex (along with all capacity that is currently under construction) forms part of the Applicant's need assessment.</p>
<p>Benefits of the Proposed Development</p>	<p>Appendix 3: Comments on the Project Benefits Report</p> <p>Summary (page ii)</p>	<p>The net contribution to renewable energy comes with a contribution from the fossil fuel elements.</p> <p>As described in Section 14.9 of ES Chapter 14: Climate Change (Volume 6.2) [APP-041], it is acknowledged that fossil (non-biogenic carbon) sources of material in the residual waste used as fuel would contribute to the energy generated by the EfW CHP facility and this is accounted for in the assessment. The ES sets out how fossil derived CO₂ emissions have been calculated (Table 14.27 of ES Chapter 14), which have been included in the overall emissions determined for the Proposed Development case (EfW CHP facility) for comparison with the without</p>



Topic	Representation reference	Summary of Representation	
Benefits of the Proposed Development	Appendix 3: Comments on the Project Benefits Report Summary (page ii)	The Proposed Development will not deliver the heat claimed and companies seeking to decarbonise their heat supply will not find it an attractive source. The demand for heat customers is questioned.	<p>Proposed Development case (landfill disposal of residual waste).</p> <p>It is noted that other forms of electricity generation (such as a modern gas fired power station referred to in the representation), may be less carbon intensive than electricity generated by the EfW CHP facility. However, as the Proposed Development uses residual waste to generate electricity the most appropriate basis for comparison of the net change in GHG emissions compared to a baseline is the use of landfill for disposing of residual waste (as described in Section 14.5 of ES Chapter 14).</p>
Benefits of the Proposed Development	Appendix 3: Comments on the Project Benefits Report Summary (page ii)	The claimed benefit regarding energy security suggests that all waste should simply be combusted in the interests of energy security.	The Applicant is confident that there is demand for heat within the industrial estate which neighbours the EfW CHP Facility Site. ES Chapter 2 Alternatives (Volume 6.2) [APP-029] records that one of the Applicant's siting criteria was proximity to potential customers and refers to the BEIS UK CHP Development Map which demonstrates that Wisbech, alongside Norwich has the highest heat demand within Cambridgeshire and Norfolk. The Applicant has also prepared a Combined Heat and Power Assessment (Volume 7.6) [APP-097] which provides further consideration as to the viability of heat supply.
Benefits of the Proposed Development	Appendix 3: Comments on the Project Benefits Report Summary (page ii)	The claimed benefit regarding energy security suggests that all waste should simply be combusted in the interests of energy security.	The Proposed Development would only use residual waste as its fuel source. That is waste which is left over once waste that can be recycled or re-used has been removed. The Applicant is of the view that it is better to generate electricity (and heat) from the waste than to landfill it. This is consistent with the waste hierarchy and



Topic	Representation reference	Summary of Representation
Benefits of the Proposed Development	Appendix 3: Comments on the Project Benefits Report Summary (page ii)	<p>It has not been demonstrated that there will be sufficient waste available for the Proposed Development to operate.</p> <p>It is questioned whether use the proximity principle and the catchment area defined in the Waste Fuel Availability Assessment (Volume 7.3) [REP2-009] are appropriate</p> <p>The application of the waste hierarchy is not appropriate.</p> <p>The significance of the Environmental Targets (Residual Waste) (England) Regulations has not been recognised.</p>
		<p>the energy generated from the waste would contribute towards the UK's energy security.</p> <p>Requirement 14 in Schedule 2 of the Draft Development Consent Order (Volume 3.1) (Revision 3 has been produced at Deadline 3) confirms that a scheme must be submitted to the relevant planning authority that sets out how the Applicant will maintain the waste hierarchy and minimise the receipt of recyclable and reusable waste at the EfW CHP Facility.</p>
		<p>An updated version of the WFAA was produced at Deadline 2 – see WFAA (Volume 7.3) [REP2-009]. This provides a clear and robust case of need – and one which is based upon a range of up to date, publicly available, credible and rigorously examined data sources. This has continued to conclude that there is insufficient existing or planned residual waste management capacity to ensure that residual 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).</p> <p>The focus of the Applicant's assessment is on the diversion of potentially suitable residual waste from being managed at the bottom of the waste hierarchy i.e., landfill. Indeed, it is not the expectation that the Proposed Development would divert waste from any other means of management apart from landfill or exportation (which are both covered in some detail in the WFAA (Volume 7.3) [REP2-009]). The WFAA demonstrates that the project would not result in an overcapacity of waste management at either a local or a national level.</p>



Topic	Representation reference	Summary of Representation
		<p>The updated WFAA (Volume 7.3) [REP2-009] concludes that at a national level:</p> <ul style="list-style-type: none"> • In 2021, ~9.95 million tonnes of residual HIC waste was disposed of to landfill, and 1.7 million tonnes was exported as refuse derived fuel (RDF) to Europe and beyond; and • 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 ~1.6 million tonnes of residual HIC capacity in the UK (rising to over 5 million tonnes if the Government's recycling target is undershot by 5%). <p>Furthermore, at a more localised level, the updated WFAA (Volume 7.3) [REP2-009] concludes that based upon the current pattern of waste arising and management across the spatial scope of the assessment, there is potential for around 2.6 million tonnes of material to be managed further up the waste hierarchy and/or at a location that is more proximate to the point of arising. Looking ahead to the position up to around 2035 it is estimated that there will be a gap in residual waste management capacity of at least ~1.3 million tonnes per annum.</p> <p>In this context, the Proposed Development could offer up to 625,600 tonnes per annum of much needed national and local residual waste management capacity.</p>



Topic	Representation reference	Summary of Representation
Benefits of the Proposed Development	Appendix 3: Comments on the Project Benefits Report Summary (page iii)	We would agree with the applicant that applying carbon capture and storage would be beneficial, but the facility is proposed only to be carbon capture ready.
Benefits of the Proposed Development	Appendix 3: Comments on the Project Benefits Report Summary (page iii)	It is agreed that there are likely to be some local economic benefits if the Proposed Development goes ahead, but consideration should be given to the over-heated construction employment market.
Benefits of the Proposed Development	Appendix 3: Comments on the Project Benefits Report Summary (page iii)	The employment (and multiplier) benefits beyond the construction period are not articulated and in any case the socio-economic benefits would need to consider the displaced activity associated with alternative ways of managing waste, which the applicant has assumed to be landfilling

Support for the application of carbon capture and storage is noted. Requirements 22 and 23 of the **draft DCO (Volume 3.1) [REP1-007]** sets out the Applicant's commitment to reserving space for carbon capture infrastructure, so that there is no impediment to implementing such infrastructure if it becomes feasible to do so.

ES Chapter 15 Socio-economic, Tourism, Recreation and Land use (Volume 6.2) [APP-042] considers the economic effects of the Proposed Development and takes into consideration the Applicant's commitments set out within the **Outline Employment and Skills Strategy (Volume 7.8) [APP-099]**. This document seeks to work with local education and training establishments to support initiatives to encourage more people into the construction industry. It is therefore complementary to and supportive of the Cambridgeshire and Peterborough Combined Authority Skills Strategy and New Anglia Sector Skills Plan (Construction) both of which identify the construction sector as a skills priority area.

The Applicant's experience of constructing other EfW CHP facilities within the UK is such that it is confident that a three year construction timetable is achievable.

ES Chapter 15 Socio Economics, Tourism, Recreation and Land Use Section 15.9 (Volume 6.2) [APP-042] identifies, under 'Operation' that 40 FTEs would be employed at the EfW CHP Facility. In addition, an estimated 32 FTEs would be employed across the region/county.

The Applicant has not assessed the potential for job losses at landfill sites as a result of moving waste up the



Topic	Representation reference	Summary of Representation
Benefits of the Proposed Development	Appendix 3: Comments on the Project Benefits Report – Air Quality (page 10)	<p>The level of emissions in relation to the Best Available Technology Associated Emission Levels (BAT-AELs) are discussed in the Written Representation. A related comment was made in the Deadline 1 Submission [REP1-094].</p> <p>The Deadline 1 Submission [REP1-094] requested comment on the validity of the assessment of baseline air quality in the light of the potential confounding impact of the Covid-19 pandemic.</p>
		<p>waste hierarchy. The number of people employed at a landfill site is likely to be less than that at the EfW CHP Facility.</p> <p><u>Air Quality – Combustion emissions abatement</u> An application has been made by the Applicant for an Environmental Permit (EP) in August 2022. The Applicant has been informed by the Environment Agency that the application was duly made on 23 March 2023. An assessment of the Best Available Technology (BAT) for the plant is included in the EP submission.</p> <p>The BAT Assessment concludes that selective non-catalytic reduction (SNCR) represents the BAT option for the proposed EfW CHP Facility. This is because whilst selective catalytic reduction (SCR) performs better from a NO_x emissions release perspective (NO_x emission reductions achieved with SNCR are expected to be 78% of those achieved with SCR), SNCR has fewer cross media effects than SCR (e.g. ammonia slip and spent catalyst waste streams) and, on its own, will meet the required BAT Associated Emission Levels (BAT-AELs) and prevent an exceedance of environmental benchmarks.</p> <p>The emission concentrations used in the dispersion modelling are presented in Table 8B4.2 of Environmental Statement Appendix 8B: Air Quality Technical Report Revision: 3.0 (Volume 6.4) [REP2-006]. This Appendix was updated for Deadline 2, but Table 8B4.2 has remained unchanged since original publication. Table 8B4.2 confirms that the upper NO_x BAT-AEL (120 mg/Nm³) was used for the dispersion modelling, reflecting the selection of SNCR.</p>



Topic	Representation reference	Summary of Representation																																																																						
		<p data-bbox="1346 347 1603 373"><u>Air Quality – Baseline</u></p> <p data-bbox="1346 379 2022 836">Project specific air quality monitoring was carried out from 2020-2022 as detailed in paragraph 8.4.1 of Environmental Statement: Chapter 8 – Air Quality [APP-035], however this data was not used alone to characterise baseline air quality. Monitoring data collected by Fenland District Council (FDC) as part of the Local Air Quality Management (LAQM) was also used, as detailed in Section 3 of Environmental Statement Appendix 8B: Air Quality Technical Report Revision: 3.0 (Volume 6.4) [REP2-006]. Nitrogen dioxide (NO₂) diffusion tube data is provided up to and including 2019 in Table 8B3.4. More recent data are available on the FDC website. Diffusion tube results taken from the 2022 Air Quality Annual Status Report (ASR)⁶ and Fenland Air Quality Data – Monthly⁷ are provided below.</p> <table border="1" data-bbox="1346 839 1968 1190"> <thead> <tr> <th>Site ID</th> <th>2017</th> <th>2018</th> <th>2019</th> <th>2020</th> <th>2021</th> <th>2022</th> </tr> </thead> <tbody> <tr> <td>S3</td> <td>25.7</td> <td>21.1</td> <td>21.6</td> <td>17.7</td> <td>18.1</td> <td>16.7</td> </tr> <tr> <td>S5</td> <td>35.7</td> <td>28.2</td> <td>30.1</td> <td>23.7</td> <td>26.8</td> <td>24.7</td> </tr> <tr> <td>S8</td> <td>20.3</td> <td>29.1</td> <td>28.7</td> <td>23.4</td> <td>23.9</td> <td>23.0</td> </tr> <tr> <td>S12</td> <td>16.1</td> <td>14.8</td> <td>16.6</td> <td>14.3</td> <td>13.3</td> <td>12.2</td> </tr> <tr> <td>S13</td> <td>26.3</td> <td>27.2</td> <td>25.5</td> <td>26.9</td> <td>28.7</td> <td>27.4</td> </tr> <tr> <td>S15</td> <td>33.7</td> <td>29.7</td> <td>30.3</td> <td>24.4</td> <td>25.5</td> <td>25.3</td> </tr> <tr> <td>S16</td> <td>29.7</td> <td>30.6</td> <td>29.6</td> <td>23.5</td> <td>24.6</td> <td>23.6</td> </tr> <tr> <td>S17</td> <td>20.4</td> <td>17.6</td> <td>18.9</td> <td>15.2</td> <td>18.6</td> <td>15.2</td> </tr> <tr> <td>S20</td> <td>29.0</td> <td>27.3</td> <td>26.9</td> <td>21.8</td> <td>24.5</td> <td>23.6</td> </tr> </tbody> </table> <p data-bbox="1346 1225 2022 1315">These data show that 2020 NO₂ concentrations were generally lower than those in 2019 and 2021 as a result of Covid-19 lockdowns, however there is a general</p>	Site ID	2017	2018	2019	2020	2021	2022	S3	25.7	21.1	21.6	17.7	18.1	16.7	S5	35.7	28.2	30.1	23.7	26.8	24.7	S8	20.3	29.1	28.7	23.4	23.9	23.0	S12	16.1	14.8	16.6	14.3	13.3	12.2	S13	26.3	27.2	25.5	26.9	28.7	27.4	S15	33.7	29.7	30.3	24.4	25.5	25.3	S16	29.7	30.6	29.6	23.5	24.6	23.6	S17	20.4	17.6	18.9	15.2	18.6	15.2	S20	29.0	27.3	26.9	21.8	24.5	23.6
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⁶ Fenland District Council (2022) 2022 Air Quality Annual Status Report (ASR)

⁷ Fenland District Council (2023) Fenland Air Quality Data - Monthly



Topic	Representation reference	Summary of Representation
		<p>downward trend in concentrations. 2022 NO₂ concentrations were lower than 2021 concentrations at all sites. The data collected in 2021 in the survey for the Proposed Development is therefore considered to be in the expected range and not affected by Covid-19 lockdowns, and therefore appropriate for the assessment.</p>
<p>Alternatives (including the waste hierarchy)</p>	<p>Main Report: Section 2.4 Alternatives (page 8)</p>	<p>Section 2.4 of the written representation provides an interpretation of the application of the waste hierarchy. The representation questions whether the Applicant's assessment of alternatives is appropriate, in accordance with the requirements of NPS EN-1 paragraphs 4.4.1 and 4.4.2.</p> <p>An updated version of the WFAA was produced at Deadline 2 – see WFAA (Volume 7.3) [REP2-009]. This provides a clear and robust case of need – and one which is based upon a range of up to date, publicly available, credible and rigorously examined data sources. This has continued to conclude that there is insufficient existing or planned residual waste management capacity to ensure that residual 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). The WFAA (Revision 2) demonstrates that the project would not result in an overcapacity of waste management at either a local or a national level.</p> <p>Furthermore, a statement of the Applicant's compliance with the waste hierarchy principles is set out in Section 2.3 of the WFAA (Volume 7.3) [REP2-009].</p> <p>NPS EN-1 paragraph 4.4.2 states that applicant's should include in their ES, as a matter of fact, information about the main alternatives they have studied and that the ES "should include an indication of the main reasons for the applicant's choice, taking into account the environmental, social and economic effects and including, where relevant, technical and commercial feasibility". The Applicant's ES Chapter 2 Alternatives (Volume 6.2)</p>



Topic	Representation reference	Summary of Representation	
Alternatives (including the waste hierarchy)	Main Report: Section 5.0 Consideration of Alternatives (and the Waste (England and Wales) Regulations) (page 23)	This section contends that the Applicant has failed in its duty to apply the waste hierarchy.	[APP-029] does presents this information and is compliant with the national policy stated.
Alternatives (including the waste hierarchy)	Appendix 4: Comments on ES Chapter 2 Alternatives 1.2 Site Selection Process	The approach to selection, informed by the WFAA is backward looking in that it considers waste availability seven years before operation rather than looking forward	To demonstrate the need for the Proposed Development it is necessary to understand both the existing and future amounts and availability of residual waste. This is done by examining current local authority information most readily found within Waste and Mineral local plans. Local authorities undertake their own baseline assessments and include consideration of current and future waste initiatives when predicting their requirements for waste management over the future lifetime of their local plans. The WFAA (Volume 7.3) [REP2-009]. uses this information, along with other national and regional studies, to predict future residual waste requirements
Alternatives (including the waste hierarchy)	Appendix 4: Comments on ES Chapter 2 Alternatives 1.2 Site selection	The potential for using heat is considered within the sensitivity analysis yet if the Applicant was genuinely interested in providing heat it would have considered district heat to households and businesses. The Environment Agency should be satisfied that heat has been recovered as far as is practicable.	The Applicant's climate assessment reported within ES Chapter 14 Climate (Volume 6.2) [APP-041] considered a base case which is that there is no heat supplied by the Proposed Development and hence, there are no carbon savings to be made by businesses switching from natural gas to renewable heat. This was undertaken to present a 'worse case' in terms of emissions saved yet the conclusions drawn were that the Proposed Development will still reduce carbon emissions over the existing



Topic	Representation reference	Summary of Representation	
Alternatives (including the waste hierarchy)	Appendix 4: Comments on ES Chapter 2 Alternatives 1.2 Site selection	There is no explanation as to the choice for the size of the facility.	<p>situation which is to use landfill. Because the use of heat by local businesses would lead to greater GHG emission savings a sensitivity analysis was undertaken and presented within ES Chapter 14 Climate Appendix 14C (Volume 6.4) [APP-088]. This concluded that exporting steam (heat) in addition to electricity would enhance the net savings in emissions.</p> <p>The Applicant is committed to the export of heat to surrounding businesses and has included a CHP Connection as part of the Proposed development. The Applicant's other EfW CHP Facilities in Europe and in the UK export heat, or in the case of Dundee are designed to export heat and one of the reasons for selecting Wisbech was the potential high heat loads within the local area. The Applicant is aware of FDC plans to develop land to the south and east of the Proposed Development for business and residential uses and it would wish to engage with FDC to discuss opportunities to supply a district heating system.</p>
Alternatives (including	Appendix 4: Comments on ES	There is no discussion of alternative configurations for dealing with residual waste. The Applicant is required to discharge its duties with regard to the waste hierarchy. In	<p>The size of the EfW CHP Facility is informed by the availability of the fuel source (residual waste) and a requirement to move its treatment up the waste hierarchy and away from landfill. That there is sufficient residual waste to serve the Proposed Development is evidenced by the WFAA (Volume 3.1) [REP2-009]. There are efficiencies in terms of the amount of electricity and heat generated in using a single facility to handle the amount of residual waste identified rather than it being processed in more than one facility each with a lower capacity.</p> <p>The Applicant is keen to see an increase in recycling rates and agrees that the most efficient method of achieving this is through source separated kerbside collection systems,</p>



Topic	Representation reference	Summary of Representation
the waste hierarchy)	Chapter 2 Alternatives 1.3 Technology and Processes	630,000 tonnes of waste leftover after source separation, a considerable quantity of material can be sorted and recycled. or processing mixed waste using sorting systems to extract what can be recycled. The waste that will be received at the Proposed Development will be residual waste collected alongside source separated recyclable materials, or mixed waste that has been processed using sorting systems; since this waste would have otherwise been landfilled it will have been moved up the waste hierarchy, therefore discharging the Applicants duties with regard to the waste hierarchy. Any practical and economically feasible opportunity to maximise recycling will have taken place prior to delivery of residual waste to the Proposed Development, by which time any potentially recyclable materials will be too contaminated and or too mixed to be safely and economically separated and therefore recycled.
Alternatives (including the waste hierarchy)	Appendix 4: Comments on ES Chapter 2 Alternatives 1.3 Technology and Processes	The Proposed Development could have chosen to integrate a high quality mixed waste sorting system at the front of the incineration facility. There are existing examples in Europe. This could reduce the amount of waste needed to be burnt, thereby reduce the calorific value and hence the total calorific content of the residual waste by around 30% leading to a reduction in the net climate impact and emissions. Based on MVV's experience, we refer the ExA to the last sentence in the response immediately above. Whilst referred to, no examples of "high quality mixed sorting systems" and specifically those in the UK dealing with residual waste are provided by the Interested Party.
Alternatives (including the waste hierarchy)	Appendix 4: Comments on ES Chapter 2 Alternatives 1.3 Technology and Processes	Whilst a matter for permitting, no discussion has been given regarding the abatement techniques chosen and it appears that cheaper, lower performance, selective non-catalytic reduction of NOx has been chosen. As highlighted by the Interested Party, this is a matter for the Environmental Permit. The Applicant's Environmental Permit was duly made by the Environment Agency on the 23 March 2023 and the Applicant anticipates the Environment Agency will commence consultation soon.
Alternatives (including the waste hierarchy)	Appendix 4: Comments on ES	The CHP connection proposed considers alternative routes, but seems to have decided on a means of connection above The CHP Connection would not prevent the reopening of the Disused March to Wisbech Railway. ES Chapter 3



Topic	Representation reference	Summary of Representation	
the waste hierarchy)	Chapter 2 Alternatives 1.4 CHP Connection	ground and in a location which raises the likelihood of closing off other alternative uses of the same land, not least given the 40 year planned operational period.	Description of the Proposed Development (Volume 6.3) [APP-049] Figure 3.27 demonstrates how the connection would be accommodated within the railway corridor. The Applicant has engaged with network Rail and the Statement of Common Ground (Volume 8.2) [PDA-002] records that business clearance was issued by network Rail on 01 April 2022 and that Network Rail does not have an in-principal objection to the CHP Connection being located on its land.
Climate	Main Report: Section 2.3 Climate Change Impacts of EfW Main Report: Section 3.1 Slowing the Pace of Decarbonisation of Power Appendix 5: Comments on ES Chapter 14 Climate Section 1.1 Policies and Implications	Section 2.3 of the Written Representation sets out a view that EfW facilities could be perceived as much 'fossil fuel' power stations as they are sources of renewable energy. The representation provides commentary on the nature of the waste that may be accepted at the EfW Facility, and the potential carbon outputs of burning this waste	The CHP Connection would not prevent the reopening of the Disused March to Wisbech Railway. ES Chapter 3 Description of the Proposed Development (Volume 6.3) [APP-049] Figure 3.27 demonstrates how the connection would be accommodated within the railway corridor. The Applicant has engaged with network Rail and the Statement of Common Ground (Volume 8.2) [PDA-002] records that business clearance was issued by network Rail on 01 April 2022 and that Network Rail does not have an in-principal objection to the CHP Connection being located on its land.
Climate	Main Report: Section 3.2 A Worsening of Climate Change Outcomes Appendix 5: Comments on ES	Section 3.2 of the written representation provides commentary on the methodology adopted within the climate assessment, highlighting perceived errors in the assessment. The written representation asserts that the Proposed Development would have a negative significant effect, rather than a beneficial significant effect concluded in the Applicant's assessment. The written representation	NPS for Renewable Energy Infrastructure (EN-3) considers EfW as renewable energy. It is acknowledged that as a standalone entity the Proposed Development results in net carbon emissions when considering emissions from the EfW combustion processes compared to avoided emissions for energy generated by the EfW CHP Facility. However, the GHG



Topic	Representation reference	Summary of Representation	
Climate	Chapter 14 Climate Section 1.1 Policies and Implications and 1.2 Assessment of EfW (Relative to Landfill)	goes on to suggest that the Proposed Development will increase GHG emissions rather than reduce them.	assessment in Section 14.9 of ES Chapter 14: Climate Change (Volume 6.2) [APP-041] indicates a net reduction in emissions in the 'with Proposed Development' scenario compared to a 'without Proposed Development' scenario. EfW is the generation of partly renewable electricity and/or usable heat from non-recyclable waste. 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. Relative to the 'without Proposed Development' case, the Proposed Development is estimated to result in a net decrease in GHG emissions equivalent to approximately 2,571ktCO ₂ e over its lifetime.
Climate	Appendix 5: Comments on ES Chapter 14 Climate Section 1.2 Assessment of EfW (Relative to Landfill)	Comments on the waste composition considered.	The assessment of methane emissions for landfill in ES Chapter 14: Climate Change (Volume 6.2) [APP-041] assumes that rather than all non-fossil (biogenic) carbon being turned into methane, only a proportion of the non-fossil carbon in residual waste is turned into methane. Therefore allowance has been made for the proportion of non-fossil carbon sequestered in landfill, which has been deducted from the landfill emissions. This is in-line with Defra's model ⁸ (referred to in the representation) for evaluating sensitivity factors related to CO ₂ emissions from EfW and landfill, which assumes a proportion of biogenic carbon in residual waste would be locked away (sequestered) in the landfill. The Defra model also considers scenarios for EfW where CO ₂ emissions from biogenic carbon sources are included and excluded, noting that the conventional approach is to exclude

⁸ Defra (2014). Energy recovery for residual waste. A carbon based modelling approach.



Topic	Representation reference	Summary of Representation
		<p>biogenic carbon sources from CO₂ emissions for EfW. The conventional approach has been adopted in the ES.</p> <p>Assumptions regarding the proportion of non-fossil carbon converted to methane are reported in Section 14.9 of Chapter 14 (paragraphs 14.9.14 to 14.9.15), which as referenced, are based on factors published by Defra⁹ on landfill emissions modelling for a UK scenario.</p> <p>The following assumptions are included in Section 14.9: biogenic (non-fossil) carbon in residual waste is converted to landfill gas (LFG); the percentage of biogenic carbon converted to LFG is 50% of the total biogenic (non-fossil) carbon in the residual waste; the ratio of methane to carbon dioxide in LFG at UK landfill sites is calculated to be 57:43%; and fossil (non-biogenic) carbon in landfill waste does not contribute to GHG emissions. Therefore, whilst an assumption is stated that non-fossil carbon in the waste turns into LFG, the assessment has also considered that LFG represents a proportion of non-fossil carbon in the waste (half), and of this, only some of the LFG would be available as methane (57%).</p> <p>The UK Grid Average emissions factor for electricity generation, from DUKES (2021)¹⁰, was used in the ES (rather than gas-fired power stations (CCGT)) in response to comments at PEIR stage: “<i>Concern that the assumption that energy generated by the development is only substituting fossil fuels is not consistent with the current energy mix where gas is used to generate only 41% of the electricity used in 2019.</i>” For the purposes of the assessment in the ES, to provide a conservative estimate</p>

⁹ Defra (2014). Review of Landfill Methane Emissions Modelling (WR1908).

¹⁰ BEIS (2021). Digest of UK Energy Statistics (DUKES) 2021.



Topic	Representation reference	Summary of Representation
Climate	Appendix 5: Comments on ES Chapter 14 Climate Section 1.2 Assessment of EfW (Relative to Landfill)	Comments on the firing capacity diagram (Graphic 14.2).

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. Displacement of conventional fossil fuels is the most likely scenario for the EfW CHP Facility.

In response to comments received from CCC and a meeting on 20 October 2022 with representatives from CCC, and King's Lynn and West Norfolk Council, a Technical Meeting Note (TNCC01) (provided at **Appendix 9.2c (Part 9) [REP1-036]**) was provided that additionally considered a gradual decarbonisation of the UK electricity grid over time.

The Technical Meeting Note (TNCC01) indicates that, 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 ktCO_{2e} to 414 ktCO_{2e} over its lifetime. However, as identified in the ES Core Case and the previous sensitivity analysis for the ES, 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.

The waste composition used in the **ES (Chapter 14 (Volume 6.2) [APP-041])** has been based on the availability of residual waste going to landfill, as identified in the **Waste Fuel Availability Assessment (Volume 7.3) [REP2-009]** submitted at Deadline 2. Information on the detailed breakdown of residual waste composition for



Topic	Representation reference	Summary of Representation
		<p>relevant Waste Planning Authorities is limited in terms of consistency and quality so, for the reasonable worst-case scenario at this stage, the assessment has used information on residual waste composition available from WRAP's national survey of municipal waste for England in 2017 (published in 2020)¹¹, which is considered to be representative of waste that would be available for the EfW CHP Facility.</p> <p>It is acknowledged that variation in residual waste composition affects the estimation of GHG emissions associated with EfW and LFG processes, so the GHG assessment 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 composition¹¹, assuming this accounts for a recycling rate of 45%¹². • 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

¹¹ WRAP (2020). National Municipal Waste Composition, England 2017, Table 3.

¹² HM Government (2018). England's National Waste Strategy. OUR WASTE, OUR RESOURCES: A STRATEGY FOR ENGLAND.



Topic	Representation reference	Summary of Representation
		<p>to achieve a 65% recycling for municipal solid waste by 2035¹²).</p> <p>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>
Climate	Appendix 5: Comments on ES Chapter 14 Climate Section 1.2 Assessment of EfW (Relative to Landfill)	Comments on the methodology for calculating embodied carbon, requesting details on the methodology and assumptions used.
		<p>The optimum conditions for operation of the EfW CHP facility would be to treat residual waste at a constant composition and rate. However, it is recognised that there may be variability in the composition of waste received. The firing capacity diagram presented as Graph 14.2 in ES Chapter 14: Climate Change (Volume 6.2) [APP-041], is provided to confirm that the EfW CHP facility has been designed with a degree of flexibility to accommodate such variations in waste composition. The EfW CHP facility is designed to be operated as two parallel streams; the firing capacity diagram represents the thermal output and throughput rate for one operating stream.</p>
Climate	Appendix 5: Comments on ES Chapter 14 Climate Section 1.2 Assessment of EfW (Relative to Landfill)	Comments on the consideration of CHP in the sensitivity analysis.
		<p>The assessment methodology for the quantification of GHG emissions is clearly described in Section 14.8 and 14.9 of Chapter 14: Climate Change (Volume 6.2) [APP-041]. A summary of the desktop data used to inform the assessment is provided in Table 14.10 and a full list of assumptions made in the GHG assessment are appended to the ES (Appendix 14B: Assumptions and limitations (Volume 6.4) [APP-088]). Based on assumptions from the Waste and Resources Action Programme (WRAP), Net Waste Tool (2008), wastage rates were used to assess the material quantities based on the amount of waste, and the Waste Benchmark Calculator data from Query submitted on BRE Smartwaste 21/03/2019, this calculates the estimated</p>



Topic	Representation reference	Summary of Representation
		<p>material resource required for the project over the construction period. The calculation uses a 15,000 m² estimate of the gross internal area (GIA) of the Proposed Development and categorises this as civil engineering under BRE Smartwaste's defined component categories. Material quantities for concrete and metals are based upon information available from the Applicant from similar facilities. Using the total materials required for the Proposed Development (inclusive of waste) and the Inventory of Carbon and Energy (ICE) Database carbon factors / BEIS 2021 emission factors the embodied carbon GHG emissions over the construction phase is determined.</p>

4. Comments on the Written Representation from UKWIN

4.1 Introduction

4.1.1 This section provides a summary of the points raised in **REP2-066** and provides the Applicant's response to the points raised.

4.1.2 **Table 4.1** addresses the matters raised on a thematic basis under the following topic headings:

- Climate; and
- Planning Policy and Need

4.1.3 The written representation also includes a copy of the following documents:

- Institute of Environmental Management & Assessment (IEMA) Guide: Assessing Greenhouse Gas Emissions and Evaluating their Significance (2nd Edition) February 2022;
- Secretary of State's (Department for Business, Energy & Industrial Strategy) decision letter in relation to the application for the Wheelabrator Kemsley K3 Generating Statement and Wheelabrator Kemsley North Waste to Energy Facility Order (19 February 2021);
- PAS 2080: 206 Carbon Management in Infrastructure (extracts); and
- Department for Environment Food and Rural Affairs, Resources and Waste Strategy Monitoring Progress (2020) (extracts).



Table 4.1 Comments on the written representation from UKWIN

Topic/Para	Summary of Representation	Applicant Comment
Climate (page 6)		
Climate change spreadsheets (page 5)	Request for climate change modelling data spreadsheet (paragraphs 3 to 12).	<p>The Applicant has submitted its GHG emissions assessment spreadsheets (in PDF format as required) to the examination as Appendix 10.6A to this document – Summary of Submissions made by Interested Parties at Deadline 1 and the Applicant's Response Appendix 10.6A Climate Data (Volume 10.6) [REP2-023].</p> <p>The MS Excel spreadsheets were submitted direct to UKWIN on 24 March 2023.</p>
Climate change spreadsheets (page 5)	Request for further elaboration of the implications of the Medworth Firing Capacity Diagram with regard to the link between NCV/thermal input and MW/MWh output (paragraphs 6 and 7).	<p>The optimum conditions for operation of the EfW CHP facility would be to treat residual waste at a constant composition and rate. However, it is recognised that there will be variability in the composition of waste received and the associated Net Calorific Value (NCV). The firing capacity diagram presented as Graphic 14.2 in ES Chapter 14: Climate Change (Volume 6.2) [APP-041], is provided to confirm that the EfW CHP facility has been designed with a degree of flexibility to accommodate such variations in waste composition. The EfW CHP facility is designed to be operated as two parallel streams; the firing capacity diagram represents the thermal output and throughput rate for one operating stream.</p> <p>The flexibility in the design allows for residual waste with a higher NCV to be processed at a lower throughput volume than the maximum design capacity (625,600 tonnes per annum). For example: Point 'B' on the firing capacity diagram indicates that the design thermal capacity of 201MW (2 x 100.5MW for two operating streams) would be achieved for waste with a NCV of 10.9MJ/kg at a</p>



Topic/Para	Summary of Representation	Applicant Comment
		<p>throughput of 66.4 tonnes/hr (2 x 33.2 tonnes/hr (Mg/h) for two operating streams), equivalent to 531,200 tonnes per annum, i.e. lower than the maximum throughput volume of 625,600 tonnes per annum.</p> <p>As stated in the ES Chapter 14: Climate Change (Volume 6.2) [APP-041], for UK residual waste the NCV of 9.53 MJ/kg is within the design range for the EfW CHP Facility, which the firing capacity diagram indicates would be acceptable at a waste throughput of around 608,000 tonnes per annum (equivalent to approximately 38 tonnes/hr (Mg/h) for one operating stream on the firing capacity diagram), which again is lower than the maximum throughput volume. However, rather than assuming a reduced throughput volume the ES has sought to determine GHG emissions associated with the maximum allowable volume of waste for the EfW CHP facility.</p> <p>In Graphic 14.2 of ES Chapter 14: Climate Change (Volume 6.2) [APP-041], the line between point C and point A represents 100% steam production of 125 Mg/h. At point C, with a high NCV of 14 MJ/kg, a thermal input of 98.9 MWth is required to produce 125 Mg/h of steam. Similarly, at point A, with a low NCV of 9.0 MJ/kg, a thermal input of 102 MWth is required to produce 125 Mg/h of steam. The facility is designed to operate at full load or 125 Mg/h steam production per stream (250 Mg/h combined) with any waste NCV between these two points and, since steam production is constant throughout this range, gross power production will remain close to 60 MWe throughout.</p>
<p>Conformity guidance (page 7)</p>	<p>with Conformity with Environmental Impact Assessment Guide to Assessing Greenhouse Gas Emissions and Evaluating their Significance – 2nd Edition, the General Principles of PAS 2080, and UKWIN's Good Practice Guidance (paragraphs 13 to 26).</p>	<p>The approach to quantifying GHG emissions from the construction, operation and decommissioning of the Proposed Development has been undertaken in line with</p>



Topic/Para	Summary of Representation	Applicant Comment
		<p>the latest IEMA guidance for assessing GHG emissions¹³ and the infrastructure life-cycle modules set out in PAS 2080: Carbon Management Infrastructure¹⁴. Assumptions remain in line with published material and the guidance documents.</p> <p>The Applicant has considered the ten recommendations of UKWIN's own guidance:</p> <ul style="list-style-type: none"> • Transparency and openness to scrutiny (1): The assessment methodology for the quantification of GHG emissions is clearly described in Section 14.8 and 14.9 of Chapter 14: Climate Change (Volume 6.2) [APP-041]. A summary of the desktop data used to inform the assessment is provided in Table 14.10 and a full list of assumptions made in the GHG assessment are appended to the ES (Appendix 14B: Assumptions and limitations (Volume 6.4) [APP-088]). • Impact of waste composition and technology on energy and GHG outputs (2 to 4): A summary of the desktop data used to inform the assessment is provided in Table 14.10 and a full list of assumptions made in the GHG assessment are appended to the ES (Appendix 14B: Assumptions and limitations (Volume 6.4) [APP-088]), including the operating parameters and waste composition that have been assumed for the EfW CHP Facility. It is acknowledged that variation in residual waste composition affects the estimation of GHG emissions, as such, the ES includes a sensitivity analysis of waste composition and GHG emissions (Appendix 14C: Sensitivity Analysis (Volume 6.4) [APP-088]).

¹³ IEMA (2022). Environmental Impact Assessment Guide to: Assessing Greenhouse Gas Emissions and Evaluating their Significance – 2nd Edition.

¹⁴ The Green Construction Board, Construction Leadership Council (2016). PAS 2080:2016 Carbon Management in Infrastructure.



Topic/Para	Summary of Representation	Applicant Comment
		<ul style="list-style-type: none"> • The role of landfill as a biogenic carbon sink (5): The assessment methodology for the quantification of GHG emissions is clearly described in Section 14.8 and 14.9 of Chapter 14: Climate Change (Volume 6.2) [APP-041]. The GHG assessment considers the net change between two scenarios: the ‘with Proposed Development’ case in which the EfW CHP Facility is constructed and operated, and the ‘without Proposed Development’ case in which the residual waste is disposed of at landfill. The ES also includes a sensitivity analysis of waste composition and GHG emissions (Appendix 14C: Sensitivity Analysis (Volume 6.4) [APP-088]). • Discrepancies between theoretical and real world performance (6 and 7): A summary of the desktop data used to inform the assessment is provided in Table 14.10 of Chapter 14: Climate Change (Volume 6.2) [APP-041] and a full list of assumptions made in the GHG assessment are appended to the ES (Appendix 14B: Assumptions and limitations (Volume 6.4) [APP-088]), including the operating parameters and waste composition that have been assumed for the EfW CHP Facility. The ES also includes a sensitivity analysis of waste composition and GHG emissions (Appendix 14C: Sensitivity Analysis (Volume 6.4) [APP-088]). • Displacement of other sources of electricity and/or heat (8): At Appendix A of Technical Note Climate Change (Doc Ref: TNCC01) [submitted at Deadline 1 - Volume 9.2 Applicant’s Comments on the Relevant Representations – Part 9 Appendices [REP1-036]] the Applicant has completed additional sensitivity analysis considering the gradual decarbonisation of the UK Grid and the potential impact on the assessment of avoided emissions. GHG



Topic/Para	Summary of Representation	Applicant Comment
Conformity guidance	<p>with IEMA GHG Mitigation Hierarchy (paragraphs 27 to 43). The representation suggests that an alternative approach of “Do Not Build” has not been adequately considered. The reasonableness of future baseline against which the Proposed Development is assessed is also queried.</p>	<p>emissions will be lower in the ‘with Proposed Development’ case compared to the ‘without Proposed Development’ case.</p> <ul style="list-style-type: none"> • Waste treatment comparators/counterfactuals (9): The EfW CHP Facility provides an option for the management of residual waste, remaining after the removal of recyclables. The Waste Fuel Availability Assessment (Volume 7.3) [REP2-009] identifies that landfill disposal is the reasonable alternative for the management of residual waste proposed to be used at the EfW CHP Facility. The GHG assessment in Chapter 14: Climate Change (Volume 6.2) [APP-041] therefore considers a ‘without Proposed Development’ case in which the residual waste is disposed of at landfill. • Low carbon claims (10): EfW is the generation of partly renewable electricity and/or usable heat from non-recyclable waste. 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. 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 (see Chapter 14: Climate Change (Volume 6.2) [APP-041]). <p>The Waste Fuel Availability Assessment (Volume 7.3) (Revision 2.0) [REP2-009] identifies that landfill disposal is the reasonable alternative for the management of residual waste proposed to be used at the EfW CHP Facility. This is considered to be the “Do Not Build” scenario.</p>



Topic/Para	Summary of Representation	Applicant Comment
		<p>It is acknowledged that as a standalone entity the Proposed Development results in net carbon emissions when considering emissions from the EfW combustion processes compared to avoided emissions for energy generated by the EfW CHP Facility. However, the GHG assessment in Section 14.9 of ES Chapter 14: Climate Change (Volume 6.2) [APP-041] indicates a net reduction in emissions in the 'with Proposed Development' scenario compared to a 'without Proposed Development' scenario where waste is sent to landfill. This supports the case for building the Proposed Development.</p> <p>EfW is the generation of partly renewable electricity and/or usable heat from non-recyclable waste. 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. Relative to the 'without Proposed Development' case, the Proposed Development is estimated to result in a net decrease in GHG emissions equivalent to approximately 2,571ktCO_{2e} over its lifetime.</p> <p>With regards to mitigation through the reduction of emissions, the Applicant has also set aside land for carbon capture and ensured that the EfW CHP Facility is carbon capture-ready. The Draft DCO (Volume 3.1) (Rev 3) includes Requirements 22 and 23 which require the retention of the carbon capture reserve space and the preparation of a regular report into the viability of carbon capture.</p>



Topic/Para	Summary of Representation	Applicant Comment
Conformity guidance	with Decarbonisation of the electricity grid (paragraphs 44 to 57).	<p>The UK Grid Average emissions factor for electricity generation, from DUKES (2021)¹⁵, was used in the ES (rather than gas-fired power stations (CCGT)) in response to comments at PEIR stage: “<i>Concern that the assumption that energy generated by the development is only substituting fossil fuels is not consistent with the current energy mix where gas is used to generate only 41% of the electricity used in 2019.</i>” 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. Displacement of conventional fossil fuels is the most likely scenario for the EfW CHP Facility.</p> <p>In response to comments received from CCC and a meeting on 20 October 2022 with representatives from CCC, and King’s Lynn and West Norfolk Council, a Technical Meeting Note (TNCC01) (provided at Appendix 9.2c (Part 9) [REP1-036]) was provided that additionally considered a gradual decarbonisation of the UK electricity grid over time.</p> <p>The Technical Meeting Note (TNCC01) indicates that, 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 ktCO_{2e} to 414 ktCO_{2e} over its lifetime. However, as identified in the ES Core Case and the previous sensitivity analysis for the ES, this additional sensitivity analysis for lifetime grid mix decarbonisation shows that GHG emissions will still be</p>

¹⁵ BEIS (2021). Digest of UK Energy Statistics (DUKES) 2021.



Topic/Para	Summary of Representation	Applicant Comment
		<p>lower in the 'with Proposed Development' case compared to the 'without Proposed Development' case, albeit at a reduced scale.</p> <p>As stated above, 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/GWh), 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.</p>
Conformity guidance	with Complete, consistent, transparent and accurate assessment (paragraphs 58 to 78).	<p>The assessment methodology for the quantification of GHG emissions is clearly described in Section 14.8 and 14.9 of Chapter 14: Climate Change (Volume 6.2) [APP-041]. A summary of the desktop data used to inform the assessment is provided in Table 14.10 and a full list of assumptions made in the GHG assessment are appended to the ES (Appendix 14B: Assumptions and limitations (Volume 6.4) [APP-088]).</p> <p>See responses under 'Climate change spreadsheets' above and comments on the recommendations of UKWIN's guidance.</p>
Conformity guidance	with GHG quantification principles – biogenic carbon sequestration (paragraphs 79 to 88).	<p>The assessment of methane emissions for landfill in ES Chapter 14: Climate Change (Volume 6.2) [APP-041] assumes that rather than all non-fossil (biogenic) carbon being turned into methane, only a proportion of the non-fossil carbon in residual waste is turned into methane. Therefore allowance has been made for the proportion of non-fossil carbon sequestered in landfill, which has been</p>



Topic/Para	Summary of Representation	Applicant Comment
		<p>deducted from the landfill emissions. Assumptions regarding the proportion of non-fossil carbon converted to methane are reported in Section 14.9 of Chapter 14 (paragraphs 14.9.14 to 14.9.15), which as referenced, are based on factors published by Defra¹⁶ on landfill emissions modelling for a UK scenario.</p> <p>The following assumptions are included in Section 14.9: biogenic (non-fossil) carbon in residual waste is converted to landfill gas (LFG); the percentage of biogenic carbon converted to LFG is 50% of the total biogenic (non-fossil) carbon in the residual waste; the ratio of methane to carbon dioxide in LFG at UK landfill sites is calculated to be 57:43%; and fossil (non-biogenic) carbon in landfill waste does not contribute to GHG emissions. Therefore, whilst an assumption is stated that non-fossil carbon in the waste turns in to LFG, the assessment has also considered that LFG represents a proportion of non-fossil carbon in the waste (half), and of this, only some of the LFG would be available as methane (57%).</p>
Conformity guidance	with Significance – carbon intensity and impact on decarbonisation of the electricity supply (paragraphs 89 to 106).	<p>It is acknowledged that as a standalone entity the Proposed Development results in net carbon emissions when considering emissions from the EfW combustion processes compared to avoided emissions for energy generated by the EfW CHP Facility. However, the GHG assessment in Section 14.9 of ES Chapter 14: Climate Change (Volume 6.2) [APP-041] indicates a net reduction in emissions in the 'with Proposed Development' scenario compared to a 'without Proposed Development' scenario. EfW is the generation of partly renewable electricity and/or usable heat from non-recyclable waste. The EfW CHP Facility provides an option for the management of residual waste, remaining after the removal of recyclables, which</p>

¹⁶ Defra (2014). Review of Landfill Methane Emissions Modelling (WR1908).



Topic/Para	Summary of Representation	Applicant Comment
		<p>moves the management higher up the waste hierarchy than the alternative 'without Proposed Development' scenario where waste is sent to landfill. Relative to the 'without Proposed Development' case, the Proposed Development is estimated to result in a net decrease in GHG emissions equivalent to approximately 2,571ktCO_{2e} over its lifetime.</p>
<p>Weight to be given to the Applicant's claimed climate change benefits</p>	<p>Weight to be given to the Applicant's claimed climate change benefits (paragraphs 107 to 115).</p>	<p>The Planning Statement (Volume 7.1) [APP-091] contains the Applicant's planning assessment of the Proposed Development against relevant national and local policy. The assessment notes that it is the Government's approach that operational emissions are not a reason to refuse consent for the Proposed Development; these emissions will be managed at a higher level through mechanisms such as the UK Emission Trading Scheme (ETS). Notwithstanding this, the Proposed Development would not have an adverse, material effect on the ability of the UK Government to meet its carbon target and budgets and it would instead make a positive contribution to the achievement of UK, and local, climate change commitments.</p>
<p>Planning Policy / Need for the Development (page 21)</p>	<p>The Applicant has not demonstrated that their proposed capacity for Medworth would not result in overcapacity at a local or national level, and they have not demonstrated that their proposed new incineration capacity would not undermine the achievement of long-term recycling and residual waste reduction targets.</p>	<p>An updated version of the WFAA was produced at Deadline 2 – see WFAA (Volume 7.3) [REP2-009]. This provides a clear and robust case of need – and one which is based upon a range of up to date, publicly available, credible and rigorously examined data sources. This has continued to conclude that there is insufficient existing or planned residual waste management capacity to ensure that residual, 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). The updated WFAA (Volume 7.3) [REP2-009] demonstrates that the project would not result in an</p>



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		<p>overcapacity of waste management at either a local or a national level.</p> <p>The focus of the Applicant's assessment is on the diversion of non-recyclable residual waste from being managed at the bottom of the waste hierarchy in landfill. The Proposed Development would not divert waste from any means of management than from landfill or exportation (which are both covered in some detail in the WFAA (Volume 7.3) [REP2-009]) due to the scope of its Environmental Permit limiting the waste that can be accepted by the EfW CHP Facility.</p> <p>Requirement 14 in Schedule 2 of the Draft Development Consent Order (Volume 3.1) (Revision 3 has been produced at Deadline 3) confirms that a scheme must be submitted to the relevant planning authority that sets out how the Applicant will maintain the waste hierarchy and minimise the receipt of recyclable and reusable waste at the EfW CHP Facility.</p>
<p>Government policy on need to avoid incineration overcapacity</p>	<p>As set out in REP1-06 paragraphs 32-48 (electronic pages 8-10), and as explored further in UKWIN's evaluation of the Applicant's WFAA, it is important to give full consideration to the implications of the 2027 and 2042 residual waste reduction targets in the Government's Environmental Improvement Plan 2023 and the Environmental Targets (Residual Waste) (England) Regulations 2023.</p> <p>This especially important in light of the UK Government's Jet Zero strategy which, alongside the potential increase in the use of SRF at cement kilns, could create increased competition with incineration for residual waste feedstock and therefore increase the chance of incineration overcapacity. It would also increase the</p>	<p>The WFAA (Volume 7.3) [REP2-009] has considered the implications of achieving the Government's target which seeks the total mass of residual waste not exceeding 25.5 million tonnes by the beginning of 2028; and their longer term 'stretch' target of halving residual waste produced per person by 2042 (equating to no more than 287kg per head of population in England) as set out in the Environmental Improvement Plan and the Environmental Targets (Residual Waste) (England) Regulations 2023.</p> <p>In this regard, the updated WFAA (Volume 7.3) [REP2-009] notes that a fundamental factor is that the EIP neither includes a clear strategy nor puts the required funding in place to set out how a halving of residual waste by 2042</p>



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	<p>likelihood that Medworth plant would be displacing recycling or other forms of Energy from Waste rather than landfill.</p>	<p>will be achieved - especially given the stagnating municipal recycling rates discussed at length in the assessment.</p> <p>Notwithstanding this, the updated WFAA (Volume 7.3) [REP2-009] has assessed the 'need case' for the capacity offered by the Proposed Development in the event of such an aspirational target being achieved.</p> <p>Current Office for National Statistics (ONS) population predictions are that in 2043, there will be approximately 61,744,098 people in England – and at 287kg of residual waste per head, this equates to 17.72 million tonnes of residual waste for England alone. Whilst current operational and 'in construction' EfW capacity in the UK equates to 19.4 million tonnes (as predicted by Tolvik in 2022), inevitably by 2042, a large proportion of the existing operational capacity will be decommissioned – particularly the older non-R1 compliant facilities . Furthermore, a significant portion of this capacity is located in other parts of the UK (Scotland, Wales and Northern Ireland), for which there will be 'localised' demands, taking account of the residual waste produced by these populations. With this in mind, it is considered that even in the unlikely event of the EIP stretch target of halving residual waste by 2042 being achieved, due to the necessary decommissioning of existing capacity and future capacity requirements, there remains a clear need for the capacity offered by the Proposed Development.</p> <p>In terms of the UK Government's Jet Zero strategy and the potential increase in the use of SRF at cement kilns, this has also been considered in detail in the updated WFAA (Volume 7.3) [REP2-009].</p> <p>Whilst it is acknowledged that there are emerging technologies and initiatives which may contribute to the</p>



Topic/Para	Summary of Representation	Applicant Comment
		<p>achievement of future patterns of sustainable waste management, such initiatives are embryonic in stage and yet to be proven. Furthermore, it is not considered that these projects represent a credible alternative to the Proposed Development because:</p> <ul style="list-style-type: none"> • All the projects receiving Government funding, and which plan to use residual waste, sit outside the Study Area of this WFAA. • The Sustainable Aviation Fuel (SAF) developments represent a first-of-a-kind production plants which carry with them high capital costs, as well as technology and economic risk. This is acknowledged by the Jet Zero strategy (e.g. see paragraph 3.16). These aspects currently present a barrier to private investment. • No facilities currently exist either in the UK or Europe, with the first potentially becoming operational in 2027. • Any residual waste to fuel facility going into successful operation may replace EfW facilities utilising Advanced Combustion Technology, such as gasification, which will be unable to compete once their ROC subsidies expire. In 2021 EfW capacity utilising Advanced Conversion Technology totalled around 1 million tonnes. Such facilities need an RDF/SRF type feedstock, and their cost base is such that, once their ROC subsidies expire, they may be unable to compete with a Waste to Chemical/Waste to Fuel production facility. It therefore seems reasonable to assume that as these less efficient facilities decommission due to the impact of ROC expiry, their capacity will be cumulatively replaced by new Waste to Chemical/Waste to Fuel production facilities of equal capacity, with no net impact on the residual waste capacity demand.



Topic/Para	Summary of Representation	Applicant Comment
<p>The proposed capacity could undermine recycling and the circular economy</p>	<p>Reducing the amount of plastic in incinerator feedstock can increase the effective capacity of UK incinerators by 21-31% (with the lower end of the range assuming decreases in plastic coincide with decreases in food waste).</p>	<p>For these reasons, there is a significant question mark over the ability of emerging technology such as that proposed to generate SAF to provide adequate capacity to accommodate future residual waste. Furthermore, the use of residual waste to create SAF would not result in the management of that waste being driven further up the waste management hierarchy than use of the waste at the Proposed Development – the recovery of heat and electricity (as would be the case for the Proposed Development) is, in waste planning policy terms, equivalent to the development of SAF.</p> <p>With these points in mind, it is not considered that emerging technologies such as the manufacture of SAF from residual waste represent an alternative to the Proposed Development.</p>
<p>The proposed development could undermine recycling and the circular economy.</p>	<p>As explained by the Climate Change Committee (CCC), moving towards a circular economy requires a move away from incineration: "<i>Achieving significant emission reductions in the waste sector requires a step-change towards a circular economy,</i></p>	<p>An updated version of the WFAA (Volume 7.3) [REP2-009] has been produced which reflects a municipal recycling rate of 55-60%. These ambitious recycling rates take account of the Government's desire to see increasing quantities of plastics (and biodegradable waste) removed from the residual waste stream.</p> <p>The WFAA (Volume 7.3) [REP2-009] has demonstrated that even with the ambitious recycling rates of 55-60%, future baseline levels of HIC residual waste are estimated to be between 21.0 and 24.5 million tonnes by 2030 – which would still equate to a national shortfall in residual waste management capacity of between 1.6 and 5.1 million tonnes per annum.</p> <p>The Applicant fully supports the reduction of waste, reuse of waste and recycling of waste and it must be stressed that the Proposed Development will not prevent waste reduction, reuse or recycling.</p>



Topic/Para	Summary of Representation	Applicant Comment
	<p><i>moving away from landfill and incineration (and the associated methane and fossil CO₂ emissions), and towards a reduction in waste arisings and collection of separated valuable resources for re-use and recycling. This applies at local, regional and national levels..."</i></p> <p>Incineration is considered to be a 'leakage' from the circular economy because it results in the loss of materials and nutrients from their original cycles. Furthermore, money invested in incineration cannot then be invested in better collection, sorting and treatment infrastructure, and the presence of expensive residual waste treatment infrastructure results reduce the financial incentives to reduce, re-use and recycle.</p> <p>The proposed capacity would impact on a market that already includes a significant quantity of incineration capacity. This means that even if the Medworth facility were to limit itself to processing feedstock that is 100% genuinely non-recyclable combustible material, over the lifetime of the facility a significant proportion of that feedstock would consist of material that would otherwise have been used to keep a different existing incinerator supplied with feedstock. This would require that existing incinerator to look further afield for their feedstock, and it could result in a lowering of standards (i.e. increasing the incineration of recyclable and compostable material), as well as increased travel distances.</p> <p>The proposed new incineration capacity would make it more difficult for local authorities to escape unfavourable existing incinerator lock-in, hindering efforts to renegotiate existing waste contracts to remove put-or-pay clauses or minimum tonnage guarantees. This is because incineration overcapacity makes waste feedstock harder to source, thus driving down gate fees.</p> <p>So, if local authorities wished to reduce their financial commitment to sending waste for incineration – in order to focus on reduction, reuse, and recycling instead – their negotiating position would be</p>	<p>This will be controlled by the Environmental Permit required by the EfW CHP Facility that sets out the waste categories that it can accept, and by Requirement 14 of Draft DCO (Volume 3.1) [REP1-007] and updated to Revision 3 at Deadline 3, that requires that a scheme must be submitted to the relevant planning authority that sets out how the Applicant will maintain the waste hierarchy and minimise the receipt of recyclable and reusable waste at the EfW CHP Facility.</p> <p>It is considered that the Proposed Development will support the implementation of the waste hierarchy – a cornerstone of England's waste management policy and legislative framework – by diverting waste from continued management at the bottom of the waste hierarchy (i.e., landfill) up the hierarchy, to be managed at the level of recovery, in the form of electricity recovered from it.</p> <p>The Proposed Development is designed to accept residual waste, from European Waste Catalogue (EWC) 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.</p> <p>Importantly, the WFAA (Volume 7.3) [REP2-009] submitted at Deadline 2 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</p>



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	<p>constrained by any further increase in the level of incineration capacity.</p> <p>Similarly, as increased incineration capacity lowers incinerator gate fees, increases in incineration capacity can make it more difficult for recycling to be considered economically viable.</p> <p>Concerns about the long-term viability of recycling and reprocessing capacity, arising from competition for feedstock, can discourage much needed investment in the top tiers of the waste hierarchy. As such, even the plausible risk of incineration overcapacity is therefore harmful for recycling, because it harms potential investment in recycling and reprocessing infrastructure.</p> <p>If it is concluded that this proposal could plausibly result in creating or exacerbating local, regional or national overcapacity, then consenting the capacity would, directly or indirectly, also be likely to undermine recycling and waste reduction efforts.</p> <p>The proposal would be likely to use feedstock that could otherwise have been recycled, composted, or sent to existing incinerators. This undermines the Applicant's assessment of alternatives because the Applicant's assessment has not adequately considered those alternative options.</p> <p>With respect to the range of relevant policies of Local Development Plans, the overcapacity that would result from the proposal would go against the ambitions set out in various Local Development Plan strategies across the affected areas, undermining ambitions in relation to recycling, self-sufficiency, and the proximity principle.</p>	<p>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. In particular, the updated WFAA (Volume 7.3) [REP2-009] reflects a municipal recycling rate of 55-60%, future baseline levels of Household, Industrial and Commercial (HIC) residual waste are estimated to be between 21.0 and 24.5 million tonnes by 2030 – thereby resulting in a shortfall of capacity of between 1.6 and 5.1 million tonnes per annum.</p> <p>The adoption of these recycling scenarios also sits well with the provisions of the recently published Environmental Improvement Plan (EIP) 2023, which seeks the total mass of residual waste not exceeding 25.5 million tonnes by the beginning of 2028. As such, even if residual waste reduction targets are achieved, there remains a minimum national capacity shortfall of 1.6 million tonnes.</p> <p>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 fraction or % of the residual waste stream could potentially be moved further up the hierarchy. The WFAA (Volume 7.3) [REP2-009] submitted at Deadline 2 has taken a reasonable approach to assessing potential fuel levels by reviewing quantities of residual waste that are currently sent to landfill, reducing the availability of this waste through the application of increased recycling targets, 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.</p>



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DEFRA's concerns about the recyclability of residual waste	<p>Defra's August 2020 Resources and Waste Strategy Monitoring Report revealed that most of what is currently burnt in incinerators is recyclable, stating:</p> <p><i>“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”.</i></p> <p>The report from Defra observed that: <i>“The message from this assessment is that a substantial quantity of material appears to be going into the residual waste stream, where it could have at least been recycled or dealt with higher up the waste hierarchy”.</i></p> <p>As is clear from the reasoning behind the Wheelabrator Kemsley North refusal, Regulation 12 of the Waste Regulations 2011 cannot be relied upon to guarantee that waste would be collected and processed in ways that would prevent avoidable, reusable, and/or recyclable or compostable material from being used as incinerator feedstock.</p>	<p>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.</p> <p>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).</p> <p>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.</p> <p>Importantly), the WFAA (Volume 7.3) [REP2-009] submitted at Deadline 2 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. In particular, the updated WFAA (Volume 7.3) [REP2-009] reflects a municipal recycling rate of 55-60%, future baseline levels of household, industrial and commercial (HIC) residual waste are estimated to be between 21.0 and 24.5 million</p>



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		<p>tonnes by 2030 – thereby resulting in a shortfall of capacity of between 1.6 and 5.1 million tonnes per annum.</p> <p>The adoption of these recycling scenarios also sits well with the provisions of the recently published Environmental Improvement Plan (EIP) 2023, which seeks the total mass of residual waste not exceeding 25.5 million tonnes by the beginning of 2028. As such, even if residual waste reduction targets are achieved, there remains a minimum national capacity shortfall of 1.6 million tonnes.</p> <p>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) [REP2-009] submitted at Deadline 2 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.</p>
<p>Secretary of State's concerns regarding incineration diverting from recycling</p>	<p>In February 2021 the Business Secretary refused planning permission for the proposed Wheelabrator Kemsley North (WKN) incinerator (PINS Ref EN010083).</p> <p>Establishing one of the reasons why it is necessary to consider whether need has been demonstrated for an incinerator proposed as part of the national infrastructure regime, Paragraph 4.13 of the WKN decision states:</p> <p><i>“4.1.3 The National Policy Statements set out that energy from waste is a type of infrastructure that is needed. However, the</i></p>	<p>Conclusions in respect of the Wheelabrator Kemsley North (WKN) application reflect the facts and circumstances of that particular case and are focussed on the ExA's conclusions that WKN would be inconsistent with the Kent Mineral and Waste Local Plan. In this regard, the ExA noted that WKN would conflict with the National Planning Policy for Waste because it would put at risk the achievement of revised recycling and composting targets in the Kent Minerals and Waste Local Plan.</p>



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	<p><i>National Policy Statement for Renewable Energy Infrastructure, NPS EN-3 states that an applicant for development consent must assess 'the conformity with the waste hierarchy and the effect on relevant waste plans...' NPS EN-3, notes that the decision-maker 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".</i></p> <p>In relation to recycling, Paragraphs 4.19 and 4.20 of the WKN decision state: "4.19...the ExA [Examining Authority] noted that WKN would be in conflict with the National Planning Policy for Waste because it would put at risk the achievement of revised recycling and composting targets in the Kent Minerals and Waste Local Plan. 4.20 The Secretary of State sees no reason to disagree with the ExA's conclusions in this matter".</p> <p>In his decision letter, the Secretary of State adopted the ExA's view that: <i>"...the projects would divert a significant proportion of waste from recycling rather than landfill" despite the Kemsley applicant's familiar claim that the proposed incinerator would only be burning non-recyclable material."</i></p> <p>While the Secretary of State did allow the proposed additional capacity at "Kemsley K3" to go ahead as part of the same decision, it is worth noting that the Kemsley K3 facility already had planning permission, and so the principle of development had already been established. The DCO allowed for increasing electricity output but only an additional 107ktpa of waste input, which is a significantly lower amount of new waste incineration capacity than is proposed for Medworth.</p> <p>Furthermore, the additional Kemsley K3 capacity was consented in February 2021 which was prior to EN-3 (September 2021) and</p>	<p>The WFAA (Volume 7.3) [REP2-009] sets out the clear local need for the Proposed Development (and consequential compliance with the extant development Plan). The need for the Proposed Development has been demonstrated on a local level and on a national level, and is therefore compliant with the policy requirements of the NPS EN-3. The Applicant notes that Kent sits some distance outside the Study Area which underpins the WFAA (Volume 7.3) [REP2-009] and comments specific to the WKN local area are therefore not applicable to the Proposed Development.</p>



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UKWIN's assessment of the impact of residual waste reduction targets	<p>the associated July 2022 Government statement about the need to avoid incineration overcapacity, and prior to the residual waste reduction target being announced in December 2022, and prior to the interim targets set out in the Environmental improvement Plan in January 2023. That decision also pre-dates additional incineration capacity entering construction.</p> <p>The refused WKN proposal was for an annual throughput of “up to 390,000 tonnes of waste”, while the Medworth proposal is much higher than this, with a stated capacity of up to 625,600 tonnes per annum.</p> <p>The UK Government has targets to reduce residual waste, with a 2042 target to halve residual waste and several interim targets for 2027 based on a 2019 base year. The most relevant interim target is the target to reduce municipal residual waste by 26%.</p> <p>UKWIN has carried out a top-down assessment of residual waste availability in 2027 and 2042 against the incineration capacity currently operational and under construction.</p> <p>UKWIN's approach also considers other forms of energy from waste that might rely on municipal residual waste as feedstock and that would therefore either compete with or potentially be displaced by any new incineration capacity.</p> <p>The representation then sets out a calculation which:</p> <p>a) Estimate waste arisings available as fuel:</p> <ul style="list-style-type: none"> • Establish baseline level of municipal residual waste per capita in 2019. • Estimate how much this waste will reduce in line with the 2027 and 2042 residual waste reduction targets (taking account of anticipated rises in population). • Multiply the per capita figure by the anticipated population for the relevant year. 	<p>The Applicant has examined the calculations presented by UKWIN and concludes that the methodology used for these calculations is flawed, resulting in misleading calculations of capacity requirements being drawn. Key points to note are as follows:</p> <ul style="list-style-type: none"> • The calculations of future residual waste arisings are focussed solely on municipal waste. However, this only forms part of the residual waste stream. UKWIN incorrectly asserts that Energy from Waste (EfW) plants are also called ‘municipal waste incinerators’ because they are designed to treat municipal waste and as such, it is appropriate to use municipal residual waste (rather than total residual waste) as the starting point for assessing the quantities of waste that would be available as a fuel within the context of assessing incineration capacity versus available feedstock. This is incorrect. EfW's accommodate both municipal and commercial/industrial waste (collectively known as household, industrial and commercial – or HIC waste). As a consequence of this incorrect assumption, the wrong base per capita kg levels have been applied to the UKWIN calculations, which results in a significant



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	<ul style="list-style-type: none"> • Estimate how much of this municipal residual waste would be available as a fuel. <p>b) Take into account how much of this fuel should be assumed to be used for purposes other than municipal waste incineration, e.g. used as a fuel for co-incineration at cement kilns and as feedstock for waste-to-SAF (sustainable aviation fuel).</p> <p>c) Take into account existing operational EfW capacity and EfW capacity under construction, including the impact of changes in feedstock composition on processing capacity.</p> <p>On the basis of the above, this concludes the 625,600 tonnes of new waste incineration capacity proposed for Medworth could be expected to result in overcapacity of around 921,000 tonnes in 2027 and around 4,774,000 tonnes by 2042. Furthermore, when considering the whole of England, the 625,600 tonnes of new waste incineration capacity proposed for Medworth could be expected to result in overcapacity of more than 3.3 million tonnes in 2027 and more than 10.7 million tonnes by 2042.</p>	<p>under-reporting of the potential amount of future residual waste by the following amounts:</p> <p><u>Nationally (England):</u></p> <ul style="list-style-type: none"> ○ 6.1 million tonnes in 2027 (total should be 25.6 million tonnes) ○ 4.5 million tonnes in 2042 (total should be 17.7 million tonnes) <p><u>Study Area</u></p> <ul style="list-style-type: none"> ○ 3.2 million tonnes in 2027 (total should be 13.3 million tonnes) ○ 2.3 million tonnes in 2042 (total should be 9.2 million tonnes) <ul style="list-style-type: none"> • It is considered premature and speculative to assume that 1.35mt in 2027 and 3.1mt of residual municipal waste will be used in 2042 for SAF and co-incineration. Whilst it is acknowledged that there are emerging technologies and initiatives which may contribute to the achievement of future patterns of sustainable waste management, such initiatives are embryonic in stage and yet to be proven. Furthermore, it is not considered that these projects in any event represent an alternative to the Proposed Development for the reasons set out above. • For UKWIN's national assessment of capacity, operational incinerator capacity is assumed to be 18,888,500 tonnes (in line with Appendix C of the WFAA (Volume 7.3) [REP2-009]) for England. However, for reasons outlined in Section 5.1.24 of the WFAA (Volume 7.3) [REP2-009], the Applicant's assessment relies on Tolvik 2022 data, which assumes 19.4mt of EfW capacity by 2026.



Topic/Para	Summary of Representation	Applicant Comment
		<ul style="list-style-type: none"><li data-bbox="1294 347 2011 869">• For UKWIN's local assessment of capacity, operational EfW capacity for Study Area assumed to be 8,709,500. UKWIN state that this data is taken from Appendix C of the WFAA (Volume 7.3) [REP2-009]). However, the operational EfW capacity figure used by UKWIN relates to the sub-regions of the East of England, East Midlands, London and the South-East. The Study Area for the assessment is much smaller than this, based on an approximate two-hour drive time due to the increasing cost of transporting waste beyond this distance. The Study Area used for the Proposed Development comprises the East of England plus Lincolnshire, Leicestershire, Leicester, Northants and Rutland in the East Midlands and Milton Keynes in South East. When correctly applying the data set out in Appendix C of the WFAA (Volume 7.3) [REP2-009]), operational EfW capacity for the Study Area equates to:<ul style="list-style-type: none"><li data-bbox="1440 906 2011 962">○ East of England - 925,000 tonnes (including Peterborough Green Energy Ltd)<li data-bbox="1440 970 2011 1026">○ 146,000 tonnes in the relevant East Midlands Waste Planning Authorities<li data-bbox="1440 1034 2011 1058">○ 94,000 tonnes for Milton Keynes <p data-bbox="1294 1090 2011 1337">This gives a total operational EfW capacity for the Study Area of 1,165,000 tonnes per annum. When this is added to the consented and under construction capacity in the Study Area of 945,000 tonnes per annum (595,000 tonnes in the East of England and 350,000 tonnes per annum in the East Midlands, for Study Area, total EfW capacity should be 2,110,000 tonne per annum. This is 6.6 million tonnes less than that assumed in the UKWIN assessment.</p>



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		<ul style="list-style-type: none"> Finally, in the UKWIN assessment, UKWIN has assumed that all existing EfW capacity will remain on-line by 2042. Some of the EfW capacity will be in excess of 50 years old by that time, and much capacity does not meet the R1 value requirement and will need to be decommissioned. <p>With the above points in mind, UKWIN's conclusions on over-capacity are significantly flawed.</p> <p>The Applicant is confident that its methodology is robust and presents a robust and conservative assessment of the waste capacity gap. On a national level, the Applicant notes that the WFAA (Volume 7.3) [REP2-009] assumes 19.4mt of existing capacity, exceeding the allowance made by UKWIN of 18,888,500 tonnes. The Applicant has ensured that the need for the Proposed Development has been established in a conservative scenario, and notes that UKWIN's use of a lower figure acts as confirmation that this aspect of the Applicant's assessment is robust.</p>
<p>Comments on the Applicant's Waste Fuel Availability Assessment (WFAA)</p>	<p>The conclusions of the WFAA [APP-094] are deeply flawed and therefore the Applicant's original WFAA cannot be relied upon. When the impact of residual waste reduction targets is properly taken into account, there is likely to be significant overcapacity across both England and the Applicant's WFAA Study Area, and the Medworth plant would exacerbate that overcapacity.</p> <p>UKWIN also set out how the WFAA needed to be revised to account for:</p> <ul style="list-style-type: none"> a) UK Government recycling and residual waste targets being met, including the 2027 and 2042 waste reduction targets; b) Increases in domestic incineration capacity from 2019 onwards; 	<p>The Applicant has updated the WFAA for Deadline 2 (Volume 7.3) [REP2-009], which relies upon the following updated data sources:</p> <ul style="list-style-type: none"> <i>UK Statistics on Waste</i>, Defra (published May 2022 update). <i>UK Energy from Waste Statistics - 2021</i>, Tolvik Consulting Ltd (May 2022). <i>UK Residual Waste: 2030 Market Review</i>, produced by Tolvik Consulting Ltd on behalf of the Environmental Services Association (November 2017). <i>Overview of Statistics for RDF Export from England</i>, Footprint Services (November 2022).



Topic/Para	Summary of Representation	Applicant Comment
	<p>c) Impact of changes in waste composition on waste processing capacity, including how reduced CV increases effective processing capacity; and</p> <p>d) Increases in other capacity that could take municipal residual waste, such as increases in cement kiln and waste-to-SAF capacity.</p> <p>Given that the Applicant has already acknowledged the need to update their WFAA and given that there are numerous areas of concern that have been raised by UKWIN but have yet to be addressed, it is clear that the WFAA will need to undergo significant improvement if it to be relied upon as evidence.</p> <p>In light of existing and emerging Government policies, the overcapacity arguments constitute a robust reason for refusal. Indeed, such a refusal would align with Government statements on the need to avoid incineration overcapacity and the precedent set established by the Wheelabrator Kemsley North refusal, which took into account how that incinerator proposal was expected to divert from recycling and not simply from landfill despite the Applicant's claim that it was only intended to treat non-recyclable waste.</p>	<p>The updated WFAA (Volume 7.3) [REP2-009] concludes that at a national level:</p> <ul style="list-style-type: none"> • In 2021, ~9.95 million tonnes of residual HIC waste was disposed of to landfill, and 1.7 million tonnes was exported as refuse derived fuel (RDF) to Europe and beyond; and • 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 ~1.6 million tonnes of residual HIC capacity in the UK (rising to over 5 million tonnes if the Government's recycling target is undershot by 5%). <p>Furthermore, at a more localised level, the updated WFAA (Volume 7.3) [REP2-009] concludes that based upon the current pattern of waste arising and management across the spatial scope of the assessment, there is potential for around 2.6 million tonnes of material to be managed further up the waste hierarchy and/or at a location that is more proximate to the point of arising. Looking ahead to the position up to around 2035 it is estimated that there will be a gap in residual waste management capacity of at least ~1.3 million tonnes per annum.</p> <p>In this context, the Proposed Development could offer up to 625,600 tonnes per annum of much needed national and local residual waste management capacity.</p>

