

**Medworth ISH4\_17 May\_PT4**

Created on: 2023-05-17 15:55:53

Project Length: 02:10:06

File Name: Medworth ISH4\_17 May\_PT4

File Length: 02:10:06

FULL TRANSCRIPT (with timecode)

00:00:05:07 - 00:00:13:05

Good afternoon, everyone. Can I just confirm, please, that everyone. Can see and hear me clearly.

00:00:15:09 - 00:00:16:09

Again. Yes.

00:00:16:22 - 00:00:20:15

Thank you, Mr. Pinto. And also that the live stream has restarted.

00:00:26:22 - 00:01:06:19

Yes, I can see a thumbs up there. Thank you very much for that. Okay. Welcome, everyone, to this issue specific hearing for and on environmental matters. Before the lunch break, we had completed item four air quality. So I'd like to move us on now to agenda item five. In this item, I will want to discuss the proposed development in relation to climate change, including carbon mitigation and carbon capture, mainly the assessment of greenhouse gas emissions, including the applicant's methodology and assumptions during construction, operation and decommissioning, and the approach to carbon mitigation through combined heat and power and carbon capture and storage.

00:01:07:11 - 00:01:20:15

Before I start, I would like to check that everyone has an agenda and the list of documents which I'll be referring to as part of this agenda item. It is a long list, so I'm not planning on listing everything now, so if everyone's happy with that.

00:01:24:19 - 00:01:55:21

Okay. Can't see. Everybody seems happy with that. Yes, that's fine. So I would, however, like to mention a document which wasn't included on the agenda list, which I will be referring to. This is EP 030 description of the proposed development, and we'll also be referring to the latest draft development consent order, which is REP 3007. Okay. So to start, there are a couple of issues which I'd like to cover in this hearing.

00:01:56:12 - 00:02:28:17

First of all, and whilst the slightly out of order with the published agenda, I would like to get straight into the detail of these. First, these are related to climate mitigation and carbon capture elements of the proposed development. I would also at this stage just like to note how I would like to run this agenda item to get through the many questions that I have. As you may already know, this is a very technical topic, particularly related to greenhouse gas emissions. So what I would propose is that I would like to ask my questions first.

00:02:28:19 - 00:02:58:18

I will then come to the councils and other interested parties for their contribution at the appropriate points. So please, if you can just wait until I ask for questions before raising your hands. That is, unless you have a point that absolutely can't wait. So starting with my first question to the applicant

document app 030. Description of the proposed development describes the proposed development as an energy from waste combined heat and Power facility.

00:02:59:00 - 00:03:12:22

The generation of heat and power is a climate mitigation activity. And can the applicant please set out clearly the actions they've taken to secure the delivery of the combined heat and power elements as part of the proposed development?

00:03:19:19 - 00:03:51:09

Paul Carey for the applicant. Normally energy from waste schemes of the type we're proposing would focus on generating electricity only. But it's our company policy that we would prefer to always find opportunities to also supply heat to displace the use of natural gas. And so we always try to make our facilities not just ready, but in practice.

00:03:51:12 - 00:04:31:22

And that's what we have in mind here at Medway. So we've specifically chosen this site and this is something that was discussed yesterday that this site lends itself ideally to supplying heat to a number of existing heat demands, plus future heat demands that might come along in the land that we identified or was identified yesterday as ready for development for industrial development. So that is the main thrust of making sure that we are maximising the use of the energy that's in the waste and turning it into as much useful energy as we can.

00:04:31:24 - 00:04:33:15

Does that does that answer your question?

00:04:34:27 - 00:05:11:05

Yes, it does. It does at this stage. I have a couple of other things to look at with regards to this element. Um, if I could just turn now to the draft. That's REP 307. Proposed requirement 25. I will attempt to share this on the screen so all parties can actually see this while we discuss it. But while I do that, if the applicant could just get ready, please, to explain the proposed requirement and how they feel that it would work in practice.

00:05:27:11 - 00:06:13:08

Clare project for the applicant. In terms of the requirement drafting, I can just run through that and then Mr. Kerry can explain in a bit more detail what what would actually happen in practice if that would be helpful. The drafting of the combined heat and power requirement is based on similar similar requirements in other granted development consent orders for development of this type. And what it requires the applicant to do is to submit to the relevant planning authority a report and the report must update the assessment that was provided as part of the application.

00:06:13:29 - 00:06:54:01

And the report needs to demonstrate how the applicant has considered the opportunities that exist for the export of heat from the facility and along the connection which were as works number three, three, A and three be set out in Schedule one of the draft DCO and then also requires the applicant to include a list of actions that the undertaker, which is the applicant, is able to do to increase the potential for the export of heat from the

00:06:55:20 - 00:07:26:19

facility. And the purpose of this requirement is to ensure that where there are currently no existing sort of contracts in place for users of the CHP, that this requirement provides a reporting mechanism and an obligation on the applicant to demonstrate that it's doing all that it can that's reasonably practicable to do so to ensure that there are opportunities for that heat to be taken by local users.

00:07:26:21 - 00:08:05:12

So it's designed to ensure that throughout the development, the opportunities for heat and the export of heat continue to be reviewed and the applicant is placed on a positive obligation to increase the potential for that heat to be exported. Obviously this is designed, as I said, to ensure that opportunities can be continued to be explored throughout the lifetime of the operation. But as Mr. Kerry mentioned, it's very much the applicant's intention. Once the DCO has been granted to enter into agreements with the I the users that have been identified as being potentially suitable.

00:08:05:14 - 00:08:08:12

But I can hand over to Mr. Kerry if he has anything else to add.

00:08:09:00 - 00:08:42:20

Okay. Yes. Paul, Paul, Kerry for the applicants. So this kind of obligation to report we already have at our other facilities, notably our facility in Dundee, it's something that we actively do. It's something that I personally actively do. It's part of my job. And so as soon as we do have the development consent order and we can therefore demonstrate to prospective heat users that we have a real project that can be delivered, we will start marketing the opportunity for them to take heat and electricity from us.

00:08:43:04 - 00:09:26:15

Now clearly that has to be deliverable by way of a pipeline in the case of heat. And we've already included in our works package and our boundary, the railway line that provides a useful corridor for some customers. It may well be that we might need to go back for additional planning approvals for small spurs or other pipelines to other customers that we haven't yet identified, But that would be something to be done much later on in the process. But we would be actively marketing and offering the supply of steam and possibly also hot water at competitive prices and it would have to be at competitive prices.

00:09:26:17 - 00:09:49:24

Otherwise the customer wouldn't take the energy and of course they would have their own carbon saving benefits as well. And that is something that would start very soon after receiving the DCO. It would not we would not wait until after construction is finished. It would begin very much early in the process and we would be happy to report on that as we go along.

00:09:51:22 - 00:09:52:12

Okay.

00:09:52:21 - 00:10:35:18

Okay. Thank you for that. Um, that does give clarity in terms of the requirement. I think, given the importance which government attaches to CHP, As you know, national policy statement one sets out the requirements on applicants either to include CHP or present evidence in the application that the possibilities for CHP have been fully explored. Um, I understand that the applicant may feel like they've complied with national policy in the sense that there may be able to show they've explored the possibility of CHP at this stage, but it's still not clear at present, um, that the possibility has been fully explored given the evidence provided to date.

00:10:35:20 - 00:11:10:17

As I said, I think this was touched upon extensively yesterday, but without wanting to rehash the point. But in addition, as the examining authority, we need to understand the extent of the benefits being offered by CHP, along with the certainty of their delivery in order for us to where these in our overall planning balance. And I just really want to be explicitly clear at this stage that this is what we're looking for. And we would expect to see proof of evidence as part of this examination to demonstrate the extent of the benefits being offered and the likelihood of delivery of CHP.

00:11:11:06 - 00:11:14:01

So it's just to make that really clear at this point.

00:11:17:03 - 00:11:18:28

The applicant like to come back on that.

00:11:20:04 - 00:11:52:11

Clare project with the applicant and it in relation to the policy set out in adopted N1. Obviously it's clear that the policy gives states that substantial positive weight should be given to applications incorporating combined heat and power. So this, this application does incorporate combined heat and power and it then sets out a list of criteria that the applicant should provide.

00:11:53:03 - 00:12:25:00

Where you're proposing a generation project that is not going to include combined heat and power. And in those circumstances you have to demonstrate why it's not economically or practically feasible for the generation facility to provide that that that heat demand when we're not in that particular situation here. It's not a case that the applicant is saying there isn't there aren't any potential users. And therefore, this is a generation scheme that won't incorporate combined heat and power.

00:12:25:02 - 00:13:03:17

The applicant is proposing to provide combined heat and power and it has included apparatus for that as part of its scheme. I think the issue here is how much weight can be given to the that's being proposed at this current point in the process because we don't have a specified user that is contractually committed to take the heat. And. Mr.. Mr. Kerry has explained the reasons why that would not be normally achieved at this point in the process.

00:13:03:19 - 00:13:34:29

And as I think we touched on yesterday, the N1 does actually provide for a the to contain a requirement in the event that there aren't potential users currently identified, that which accords with the requirement that we've currently included in the draft DCO. So the applicant's position is that we are in compliance with what's required under the policy for N1 in terms of combined heat and power.

00:13:35:01 - 00:13:41:08

But Mr. Kerry just wanted to add another point on that, so I'll just hand over to him. Thank you. Okay. Yeah.

00:13:41:27 - 00:14:21:14

That Paul Kerry for the applicant just to confirm the steam turbine will be designed and will have the suitable extraction point from which we would take the steam that would be used for the connections. So just to be clear, the steam that goes into the turbine is is very, very high pressure in temperature too high to send to a customer and we can only send them much lower pressure steam, much lower pressure and temperature steam. And we do that by having literally a hole on the side of the turbine with the valve from which we can supply the appropriate condition, temperature and pressure conditions, steam.

00:14:21:16 - 00:15:07:05

And that turbine, our turbine will have that facility. And we've designed the facility with the the objective of having a pipeline. And we've shown that on the drawings that goes along the railway line. So all of that is being built in. And what is required is, is the willingness of a customer to have the steam at the other end. To that end, as I mentioned yesterday, we're not prepared to breach commercial confidences, but I can tell you that we have we've identified four potential customers now

and we have asked them for data on their current energy demand, and some of them have given us that information.

00:15:07:21 - 00:15:24:09

And that has enabled us to be confident that the steam pipeline that we would build and the size of the extraction point on the side of the turbine is adequate to supply those customers. But beyond that, I'm not prepared to divulge commercially confidential information.

00:15:25:18 - 00:15:57:20

Okay. Thank thank you very much for that, Mr. Kerry. I appreciate what you're saying, obviously. And that's fine. I think we're on the same page in regards to Mrs. Broderick's, um, recent, um, representation that she's just stated there in terms of the gap that we have at the moment is, is the weight which at this stage in the process we can actually give to the combined power element, given that there is no evidence of customers for that combined heat and power element at present.

00:15:57:22 - 00:16:22:10

So I think we have made our point really clear on both sides on that one. Um, in terms of meeting a legal requirement is not the same as proving it as a benefit. And if at this stage of the process you cannot demonstrate that benefit, then we would be unable to include that benefit in our overall planning balance. And so as long as we're all on the same page about that. I'm happy to move on.

00:16:23:02 - 00:16:56:02

If I might just say, though, the truth of the matter is sorry. Paul Carey for the applicants, customers and this is our experience in our facility in Germany. Our heat customers there come and go. And that plant has been running for a number of decades now, and there are customers there today that were not customers, say, 20 years ago. So you cannot just look at it the moment today about what the benefit might be. The benefit might not come along for five years because there may not be a suitable demand

00:16:58:16 - 00:17:07:22

until five years time. So you shouldn't look at it as just a single point in time. Now it's really got to be looked at at the potential over the life of the project.

00:17:08:22 - 00:17:16:26

Clare Project for the applicant. I think we just wanted to clarify that the applicant's position is that

00:17:18:26 - 00:17:50:29

the potential to provide combined heat and power can be considered as a positive benefit and it would be unreasonable not to consider it at all as a benefit, but that the weight that should be attributed to that benefit is obviously something that needs to be considered in light of the evidence that's before you for the reasons that we've discussed. But I just wanted to make clear that it's our view that it would be unreasonable to not attach any weight to the that can be delivered by the proposed development.

00:17:51:01 - 00:17:51:20

Thank you.

00:17:54:00 - 00:17:54:28

Okay. Yes.

00:17:55:00 - 00:18:07:18

Thank you for that. Okay. If I could just ask if any of the local authorities would like to make any comments regarding the compound heat and power element of the proposed development that at this stage.

00:18:14:21 - 00:18:28:01

No, I can't see any hands up. Can I ask if any other interested parties would like to make any comments specifically regarding combined heat and power at this stage? If you do, please click to raise your hand and I'll invite you to speak.

00:18:32:06 - 00:18:45:19

Again, I can't see any hands raised, so I think we can move on. So following on from this, can the applicant please explain their approach to the carbon capture and storage elements for the proposed development, please?

00:18:50:07 - 00:19:20:20

Paul Carey for the applicant. I'll, I'll, I'll start off with the general introduction, but then I'll invite my colleague, Mr. James Ashton, to give a bit more detail on the manner and the way in which we will capture carbon on site. And then perhaps he might hand back to me about how we might deal with the carbon that we've captured. So the first thing is it's part of our general corporate policy to minimise carbon emissions and we intend to.

00:19:20:22 - 00:19:57:03

The company as a whole has very strong targets, commitments to be climate positive by 2040. And part of that would require us to do something at Bedworth. A lot depends on the way the government chooses to support these projects and other aspects around carbon taxes, etcetera. But we have reserved land space on the site in the right location close to the chimney in which we could build a carbon capture plant.

00:19:57:05 - 00:20:29:08

And Mr. Ashton will talk about that in a second. And we have begun discussions with others about how we might get that carbon securely stored and out of the atmosphere. And that is the the trick is not just to capture it, but to also transport it away. And the word that is used is to sequester it. So I'll hand over to Mr. Ashton to talk about how we do it, what we expect to be able to do on the space that we've reserved. And then he'll hand back to me and I'll talk about how we deal with sequestering it.

00:20:30:16 - 00:20:31:01

Thank you.

00:20:32:18 - 00:20:36:28

Hello? Yes, James Ashton. I'm head of engineering for the applicant.

00:20:38:14 - 00:20:54:01

And as Mr. Kerry said, we've reserved an area of land on the site and there are a number of technologies in the market and many of them are still in their infancy. They're not proven on a.

00:20:55:18 - 00:21:37:04

Commercial full scale application and one there's only. Well, probably a couple that are one of which is an aiming based solution, which is what we've selected as our preferred technology at the moment. And that's our initial thoughts. It could change as technology evolves and what we've done. We've employed a well known technology supplier to carry out a pre-feasibility study for us and we're confident on the basis of that study that the area we reserve is adequate to later build a carbon capture facility.

00:21:38:27 - 00:22:04:22

And in addition to that, the turbine in our specification will require to be retrofit ready. So the contractor, the turbine supplier, will have to provide us with a proven technical concept which demonstrates that later we can retrofit the required equipment to supply the heat load to the carbon capture facility.

00:22:06:14 - 00:22:42:14

Um, there's some more things we, we include in the specification for our proposal. Um, we also include for an allowance for space to divert the flue gas from the chimney to the carbon capture and storage facility. And we will also specify and have space for dedicated carbon capture switchgear so that we can connect it to the power source once it's built. And we also ask for an option for the the required turbine parts to retrofit the equipment when the time comes.

00:22:43:20 - 00:22:58:26

Because who knows when it might be. It might be soon after construction, it might be some years down the road. In that time, perhaps these parts are not available. So we actually intend on procuring the parts and storing them, whether it's on site or at the suppliers

00:23:00:16 - 00:23:11:27

facility. We don't know yet. So these are the things we've done. And on that basis, we're very confident that we can deliver a carbon capture solution for this project.

00:23:12:06 - 00:23:15:21

And given that, um, there.

00:23:15:23 - 00:23:28:24

Are a number of technologies available that could potentially be deployed. Is the applicant confident that sufficient space has been identified for carbon capture? And just how has that amount of space required been identified?

00:23:29:10 - 00:24:03:27

We are like I said, we've gone with a naming based solution, which is well known. That's one of the largest technologies there is. And we had HDD, Hitachi, Innova carry out a pre-feasibility sorry, pre-feasibility study for us and we're confident that the space we've reserved is adequate. There's another technology we're interested in. Um, it's from a different technology supplier and it's called a rotary packed bed absorber.

00:24:03:29 - 00:24:14:16

It's actually much smaller. It's similar to the, the amine based solution, and we're even more confident. That definitely fits. So we're confident.

00:24:15:04 - 00:24:15:21

Thank you.

00:24:16:12 - 00:24:37:26

Um, no, it's Mr. Fraser. Urquhart has his hand up at the moment. Can I just go initially to back to Mr. Paul Carey, just first of all, to as I think he had a point to make around sequestration. So if Mr. Kerry, you could make your point first and then we'll move to Mr. Fraser, if that's okay.

00:24:38:16 - 00:24:55:28

Well, I'm sorry to of cross you. It's purely a point of clarification to ask. Mr. asked for a repetition of the the name of the technology that was used. It was Amy or something of that nature. It could just be spelt out for us. And also it's anywhere in it's.

00:24:56:00 - 00:25:26:14

A mean a I'm sorry, it's Amin. Amina Amin is a is a group of chemicals that absorb carbon dioxide. So there are a number of different types of Amin. Um, but the system that we're looking at would be based on using a naming as an absorber of the carbon dioxide. So they are the most common systems and the systems are the most, most proven. And as Mr.

00:25:26:16 - 00:25:57:12

Ashton said, we are very confident that the standard Amin solution and the the second one, which name I've already forgotten, but it was the rotary pack absorber. We call it the washing machine internally because it's like a big washing machine. Um, but it basically washes the flue gases with an amine solution which then pick up and absorb the carbon dioxide that enables you to take it away and capture it. So that is the capturing system.

00:25:57:14 - 00:26:37:03

But the the challenge is not just about capturing it. It's about getting it out of the environment. And the best way to do that at the moment is to sequester it back into the North Sea, which is where you could argue the carbon came from. Now we have joined up with something called the Bacton Thames Net zero Project and won't read out the website address. But if you I'll we'll send it to you. And if you were to look at that website, you'll see our logo on the bottom of that because we're one of a dozen or so partners in that consortium who are looking at getting carbon dioxide from a number of.

00:26:37:07 - 00:27:09:13

And services to a place called Bacton, which is on the North Norfolk coast. It's an oil terminal or gas terminal, but from there the carbon dioxide can be pumped back into the North Sea to what are now empty gas fields and locked away forever. And that is the key point about decarbonisation, is not just to capture it, but to make sure it's locked away or, in other words, sequestered forever. So Bacton is some 80km. Think off the top of my head from Wisbech.

00:27:09:23 - 00:27:43:27

That happens to also be a large power station at King's Lynn which runs on natural gas. Both of these facilities could be connected to the Bacton terminal with a pipeline. It happens. There is already a gas pipeline that runs to King's Lynn that could potentially be used and we could connect to that pipeline with another pipeline, which would be just over ten miles long. And planning for that would therefore be the subject of a separate application, the ten mile limit coming into effect.

00:27:44:05 - 00:28:19:02

But technically, it would be very easy for us then to transport the carbon dioxide that we capture with Mr. Ashton's plant and send it through these pipelines to backed and thence into the North Sea. And all of that would would allow us to pass the test of decarbonisation readiness, which is what is proposed in the latest consultation document presented by the government in April. So we are confident that we will be able to pass the decarbonisation test.

00:28:19:04 - 00:28:33:24

But as was mentioned, I think yesterday, you will know that it's also proposed that that decarbonisation test be examined as part of the environmental permit procedure by the Environment Agency. So we would need to go through that process with them.

00:28:34:24 - 00:28:35:20

Okay. Thank you.

00:28:36:17 - 00:28:58:13



Obviously. So at this stage, the land is reserved for the carbon capture element. However, to fully realize that in terms of sequestration and, and um, the the, the pipeline that would ultimately require another developed consent order application to fully realize that that opportunity coming forward.

00:29:00:04 - 00:29:08:28

Okay. For that. Yes, that's true. Yes. But it's subject to the application. It's very technically possible.

00:29:10:11 - 00:29:10:26

Okay.

00:29:11:27 - 00:29:18:19

Thank you. I notice Mr. Fraser Hand is still raised. Do you have any further comments you'd like to make at this stage?

00:29:19:08 - 00:29:21:27

Sorry, that's just my negligence in not taking my hand down.

00:29:22:06 - 00:29:52:09

No problem. That's absolutely fine. Okay. If I can now turn please to proposed requirements 22 and 23 of the draft. Again, that's document rep three doubles zero seven. Again, I will share these briefly on the screen so all parties can actually see see the condition, the the draft requirements. Um, if I can ask how the applicant again sees these requirements working in practice, please.

00:29:59:27 - 00:30:01:15

Clare project for the applicant.

00:30:07:19 - 00:30:14:13

So and as think we explained at the hearing on the on the draft, there are two parts

00:30:16:21 - 00:30:57:21

to two separate requirements here. The first requirement relates to the reservation of space. So as Mr. Ashton was mentioning, space has been reserved within the proposed development for carbon capture and storage equipment, and the requirement obliges the applicant to not sell that area of land and not to do anything else to that area of land that would effectively prevent carbon capture and storage and export equipment coming forward.

00:30:57:23 - 00:31:41:17

So that's a sort of a restriction on the usage of the site and that is part of a well-established set of requirements for ensuring that land or carbon capture and storage ready or decarbonization ready as it's referred to. Now, requirement 23 is a monitoring reporting requirements, and that obliges the applicant to submit a report in this case to the Secretary of State, and that's to provide evidence that in in terms of that, we've complied with requirement 22 in terms of making sure that that space is kept reserved.

00:31:41:28 - 00:32:16:07

And it's also confirming that the applicant is able to retrofit the proposed development with the technology and that that still remains feasible throughout the lifetime of the development. It also requires the applicant to provide reasons and explanations as to whether there is any other additional regulatory consents or requirements that might be required in relation to ensuring that the facility is carbon capture and export ready.

00:32:16:13 - 00:32:33:08

So it's both a reservation, a restriction on the use of the site to ensure that carbon capture and export development can come forward and a reporting requirements to ensure that that is transparent and that there is oversight on that throughout the lifetime of the development.

00:32:34:05 - 00:32:35:13

And can ask.

00:32:36:00 - 00:32:45:13

In this instance why it is the Secretary of State that this would be submitted to as opposed to the local authority.

00:32:49:12 - 00:33:08:24

Clare project for the applicant. The applicants based the drafting on similar carbon capture and readiness reporting requirements that have been granted be included in maid orders. And that is our understanding that the Secretary of State is preference is for the report to be submitted to them.

00:33:10:16 - 00:33:11:01

Okay.

00:33:12:12 - 00:33:15:09

Yeah, I'll just stop sharing that now.

00:33:17:09 - 00:33:31:22

Clear portrait of the applicant. And just to confirm that if the if the local planning authority would like to be sent a copy of that report, then the applicant is happy to do so. If that is something that Cambridgeshire County Council would like to receive a copy of.

00:33:36:00 - 00:33:37:03

I thank you for that.

00:33:37:27 - 00:34:00:23

I think before we move on. I just really want to be clear again, at this stage in my understanding that at this stage you're committing to explore the feasibility of carbon capture only through requirements 22 and 23 and you're not at this stage making a commitment to providing carbon capture. Is that correct?

00:34:02:02 - 00:34:04:11

AppleCare for that? Yes, that's correct.

00:34:06:19 - 00:34:49:27

Many of these projects, including the one mentioned, the Bacton Thames Net Zero Project, are all part of an early stage government supported initiatives. You may have heard of something called Track one. The Bacton Net zero project will be in what's called track two. The government has already requested expressions of interest for that, which was submitted by the Bacton Thames Net zero project, and they should then be invited to submit applications and subject to that application they would receive government support and if they don't receive government support, then the dynamics change slightly, probably meaning that it might take longer before they can start their work.

00:34:49:29 - 00:35:02:09

But so we can't commit to doing something until we know that at least they have their support or their commitment to go ahead. And then we could start today the plans for our own commitment.

00:35:06:04 - 00:35:23:21

Okay. Thank you again. Think with just similarly with the last item in terms of combined heat and power, I think just being clear about the extent of the benefits being offered at this stage and the fact that at present carbon capture and storage is not included as an element of the proposed development.

00:35:26:29 - 00:35:59:11

That's understood. As in our unlike our position on the potential off taker of heat for for the connection. We can tell you that we are party to this group, this agreement. I don't know whether I can give you a copy of that agreement. I will check to see whether I'm allowed to give you a copy of that agreement, just to show evidence that we are, in fact, members of this consortium with with the Bacton Thames Net zero project. I'm happy to check whether we can give you a copy of that.

00:35:59:13 - 00:36:08:20

It might be a redacted version because there are about to 12 or so parties to this. It may prove a little bit harder to get all those permissions.

00:36:11:20 - 00:36:12:23

Okay. Thank you.

00:36:13:07 - 00:36:26:04

Um, if I can now ask Cambridgeshire County Council and Fenland District Council if they would like to make some further comments regarding the carbon capture and storage element at this stage. I do see Mr. Frederick Andrews there.

00:36:27:24 - 00:37:24:06

Yes. I'm just very briefly to observe this, um, the extent of the obligation resting upon the applicant with respect to carbon capture appears simply to be to allocate an area of land, not to use that land for anything else and to report on a regular basis to the Secretary of State. There's no obligation even to use, for example, best endeavours to bring about carbon capture. And therefore, we think that with respect to your entirely correct in your approach to the weighting of of any benefit that might be thought to attach to the possibility of carbon capture coming into effect, because it is in fact a entirely speculative and with, as you've already identified, a number of steps necessary to be taken, both technical and legal, before it can come about.

00:37:24:08 - 00:37:45:07

And secondly, not something which as the is currently drafted, there's any any real obligation at all on the developer, even if it becomes entirely feasible both from a technical and legal basis, they could still decline actually to do it. So we think that ought to be firmly in your consideration when waiting this so-called benefit.

00:37:46:18 - 00:37:50:09

Can I just ask if the applicant would like to come back on that particular point?

00:37:58:26 - 00:38:34:10

Clare project for the applicant. It was just we just wanted to clarify that the applicant is policy compliant in terms of what it has put forward in terms of being decarbonization ready. That's in accordance with the emerging policy, but also compliant with the existing policy that applies to generating stations that are much larger than the. So there's currently no legal requirement to do it, but it's compliant with the existing policies for larger generating stations and compliance with the merging policy.

00:38:34:24 - 00:39:04:28

So we just wanted to be clear that it's policy compliant but agree that the weight to be attributed to the benefit is obviously something that you will need to take into consideration. The status of carbon capture, storage and export both for this project, but also generally in terms of what is actually achievable for any project at this current point in time. In relation to the ability to commit to the delivery of carbon capture, storage and export technology. I don't know if Mr.

00:39:05:00 - 00:39:07:21

Kerry wants to add one more point to that. Thank you.

00:39:08:06 - 00:39:42:25

Okay. For the applicant without just rereading requirement 22 again, we would be happy to demonstrate that the plant is being designed and specified to allow carbon capture. So it's not just a matter of reserving space, it's a matter of, as Mr. Ashton said, making sure that the design of the energy from waste plant itself can accommodate those things either immediately or through retrofitting of equipment. And we'd be happy to demonstrate that during the early stages of the construction program so that you can be sure that that is not something we're just talking about.

00:39:42:27 - 00:39:44:18

It's something we are actually doing.

00:39:47:09 - 00:39:50:10

Yes. Think that would be useful? Mr. Kerry, please. Um.

00:39:52:19 - 00:39:58:13

If you can do that. If I can take that away as an action for you to be able to provide that information.

00:40:02:25 - 00:40:11:12

You know. Yes. We would then propose a slight modification to requirement 22 to incorporate the provision of design information and other evidence.

00:40:20:20 - 00:40:21:05

Yeah.

00:40:23:03 - 00:40:25:26

If I can come back to Mr. Fraser Urquhart, please.

00:40:26:08 - 00:40:57:07

Just very briefly, and apologies for going around the houses on this, just to say that one has to take a realistic view of the likelihood of an expensive process of retrofitting equipment actually being undertaken in the absence of any legal requirement to do so. It would be a purely benevolent act on the part of the applicant to do so, and one has to take a realistic view, therefore, of whether it would actually ever happen.

00:40:59:06 - 00:41:00:24

Yeah. Thank you for that.

00:41:02:18 - 00:41:05:10

I'm sorry. Sorry. I'm sorry.

00:41:05:12 - 00:41:06:18

Carry on, Mr. Kerry.

00:41:07:03 - 00:41:25:24

There's a book here for that. Please don't forget everyone that. We will also be governed by the Environment Agency and the environmental permit. And all of this will be required of us in that permit. So it's not just a matter of complying with this, but also the conditions of our permit, which are probably a lot more stricter.

00:41:28:25 - 00:41:30:03

Okay. Thank you for that.

00:41:31:22 - 00:41:57:04

Okay. If I can ask if there's any other interested parties that would like to make any comments specifically regarding carbon capture and storage at this stage, if you would like to raise your hand, I have noticed that I do have a couple of people with hands raised. If at the moment, if anyone else wants to raise their hands, I'll work through them in turn. If I can turn first of all to Councillor Michael Duale, please.

00:42:00:08 - 00:42:25:20

Thank you, ma'am. Um, my first question is based around the what I spoke about yesterday, which is the parasitic load of firstly, the amine based solution and secondly, the rotary pack's bed absorption solution. What would be the net capacity, net generation capacity of the plant if and when these were employed? Thank you.

00:42:29:17 - 00:42:31:05

And pass it back to the applicant, please.

00:42:31:25 - 00:43:16:02

Okay. Thank you, Paul. Carrie, for the applicants. There will be a reduction in the net, uh, output of the facility. The amount of power that will go into the grid will be reduced because we'll both be taking electricity for running the carbon capture plant, but also steam, which will also further reduce the electrical output so the net output of the facility will be reduced. But in anticipation of council, what is next question? The gross output will remain the same at almost 60MW, and it's the gross output that determines that this application comes under the development consent order process, not the net output.

00:43:16:04 - 00:43:22:26

So it would still remain a development consent order project even if it had carbon capture fitted to it.

00:43:26:12 - 00:43:29:12

Would Mr. Diwali have any further comments to make?

00:43:30:06 - 00:44:06:27

Thank you, ma'am. Yes, just in in the during the process or during the timeframe of potentially getting a carbon capture and storage facility active. I'm just concerned about the carbon emissions that will go into the atmosphere insomuch that the Tyndall Centre in Manchester has suggested that Fenland, as part of their fair share of the Paris Agreement, should only emit 4.1 million tonnes of carbon dioxide between 2020 and 2100.

00:44:06:29 - 00:44:23:28

This would be consumed by this plant alone within 20 years. So what alternatives would be envisaged to minimise carbon emissions, failing carbon capture and storage being deployed? Thank you.

00:44:26:15 - 00:44:44:21

If I can just say we are going to be moving on to greenhouse gas emissions as our next item. If the applicant does want to give a response directly to Mr. Diwali. And then I'll take other questions from

interested parties and then we'll move on to to that element. But I'm happy to take this question at the moment.

00:44:45:25 - 00:45:05:26

The pool carry for the applicant. The best solution in the absence of any carbon capture facility would be for Fenland and Cambridgeshire and Norfolk Council to encourage local energy users to take steam from us and cut off their gas boilers and save emissions there. Thank you.

00:45:09:24 - 00:45:12:27

Okay. Thank you for that. If I can.

00:45:12:29 - 00:45:17:24

Move on to Mr. Shlomo. Darwyn, you have your hand raised.

00:45:20:20 - 00:45:24:00

Uh, in fact, it is Mr. Josh who will be Our.

00:45:24:02 - 00:45:25:10

Apologies for that. Sorry.

00:45:25:22 - 00:45:57:09

No, we were a bit of a duo, uh, in relation to the point that, uh, Mr. Kerry was meeting in relation to the permitting requirements being more stringent. We are very familiar with the requirements of the environmental permitting England and Wales regulations 2016 and they at present leave issues in relation to carbon capture and CO2 emissions etcetera, to the planning system to deal with rather than it being a permitting matter.

00:45:57:11 - 00:46:30:29

And so, for example, there's not a single reference to carbon capture in the recently issued Horsham permit. There is the potential that some elements of decarbonisation readiness will be introduced into the permitting system in the future. But it is possible that when that happens, the Government are discussing potentially transitional arrangements, which means they would only apply to certain facilities and not necessarily ones which at a certain point in time were under development.

00:46:31:01 - 00:46:52:08

And therefore there's no guarantee that this facility would be covered by it, even though there is the potential that it might be. And so we reject the assertion that in this respect, at present the permitting regime is more stringent than the planning regime in relation to consideration of carbon capture issues.

00:46:53:21 - 00:46:54:21

With the applicant like to.

00:46:54:23 - 00:46:55:18

Come back on that?

00:46:56:15 - 00:47:26:15

Yes. Paul, carry for the applicant. It's our understanding that the proposals that were published in April, which would mean that the Environment Agency becomes the guardian of this requirement, the decarbonization decarbonization readiness requirement would be implemented in the middle of 2024, and without even requiring that, I can assure you that we will make sure that this facility is decarbonization ready. We've already done sufficient work to demonstrate that, and we can demonstrate that.

00:47:26:17 - 00:47:54:11

As I mentioned, I'm happy to certainly investigate that. We can demonstrate that we have the means to transport the the carbon dioxide away to Bacton. And Mr. Ashton has explained already enough. I think that we've got the technical details sorted out for the site itself. So I had no problem in demonstrating it. Whether it becomes a legal requirement before we get our permit or our consent is irrelevant because we'll do it anyway.

00:47:59:09 - 00:48:06:12

Thank you for that. I can see Mr. Little have you. You have your hand raised. Would you like to introduce yourself, please?

00:48:09:16 - 00:48:40:28

Yeah. It's Dr. Martin Little for Quinn. I've been intrigued for some time about the carbon capture, which I do understand. And there are two proven large scale industrial sites using the main system. It's the storage and disposal of the CO<sub>2</sub>, which particularly intrigued me. I haven't heard about the Bacton to Midlands Gas pipeline as a reverse pipe for disposal of CO<sub>2</sub> to the North Sea before. But just a small point.

00:48:41:00 - 00:48:55:29

Can the applicant suggest to me when that pipeline will become available for pumping CO<sub>2</sub> out to the North Sea instead of gas to Birmingham? Thank you.

00:49:02:05 - 00:49:03:26

And the applicant come back on that, please.

00:49:03:28 - 00:49:04:14

Yes.

00:49:04:16 - 00:49:38:18

Yes, ma'am. Paul, Care if the applicant. Um, the there are two pipelines that run from backed into Kingsland and it's been discussed, as far as I'm aware. And this is not something, this is not a discussion that we've been involved in directly because this is something that the Bacton Thames Net Zero Project have been discussing the potential to use one of those two pipelines. But there is the alternative to lay a new pipeline for the sole and express purpose of taking carbon dioxide from King's Lynn to, um, to to Bacton.

00:49:38:20 - 00:50:13:02

Obviously King's Lynn is an operational facility, so therefore the and let's be clear, it's the Bacton Thames Net zero project that are running this these discussions they have discussed with the King's Lynn Power station because they exist and they run from time to time the prospect of producing or taking carbon dioxide to bacton we are not yet permitted or consented and therefore we are a relatively new addition to their thinking. Hence the need for a new pipeline to get from Wisbech to King's Lynn.

00:50:13:07 - 00:50:27:11

But it could be either the use of one of those natural gas pipelines or a new pipeline to take the gas to to bacton. That decision is yet to be made by the Bacton Thames Net zero Project. Thank you.

00:50:29:09 - 00:50:38:16

So think Mr.. Dr. Little's question was regarding timescales. Do you have any any idea on the timescales of that coming forward?

00:50:38:18 - 00:50:46:25

I don't. As as we speak, I don't. I can ask, but I don't think there'll be a firm timescale, even if I ask. Okay.

00:50:52:27 - 00:50:54:25

Okay. I can't see any.

00:50:54:27 - 00:51:11:18

More hands raised at this stage, so I would like to move us on if I can. Um, if I can ask the applicant to please set out their approach to the assessment of greenhouse gas emissions of the proposed development during construction operation and decommissioning. Please.

00:51:23:10 - 00:51:43:14

A good afternoon. This is Matt Sunderland. On behalf of the applicant. So the chapter 14 of the Environmental statement app 041 sets out the national policy legislation, regional and local planning policies relevant to the GHG emissions associated with the proposed development.

00:51:45:08 - 00:52:29:14

And Chapter 14 then goes on to to list the technical guidance used to undertake the assessment. The sources of the data used and noting that the technical guidance and the government, the the sources of data used in all cases, apart from those relating specifically to the to the project, the proposed development, their peer reviewed or government approved publications commonly used and applied to carbon assessments of infrastructure projects in the UK and the activity data of the proposed development is as described in the environmental statement.

00:52:30:00 - 00:53:03:23

The calculation of the indicative carbon content and calorific values of main waste types found in residual waste was undertaken by using their greenhouse gas calculator for municipal waste, which they call rate and its version two they use. These calculations were compared to the indicative carbon content and breakdown of residual waste using energy for waste facilities from a zero Waste Scotland study. The Carbon Trust report for Quarry Riverside Energy from Waste Facility and the DEFRA carbon modelling of UK waste streams.

00:53:04:08 - 00:53:15:15

So in other words, the all of the information used was either from a published source, a government approved source, or was verified by comparing to other published studies.

00:53:19:00 - 00:53:19:17

Thank you.

00:53:20:09 - 00:54:03:03

If I can now ask the applicant to set out their methodology for assessing the net greenhouse gas emissions when comparing the effects of the proposed development with the effects of no development. In particular, I'm interested in the level of confidence that the applicant has in the greenhouse gas emissions calculations, given that in the applicant's response to Cambridge County Council and Fenland District Council Local Impact report, that's 2020. The applicant acknowledges that variation in residual waste composition affects the estimation of greenhouse gas emissions and the fact that a number of interested parties have challenged the greenhouse gas figures and put forward alternative scenarios.

00:54:05:05 - 00:54:08:24

Okay. So if we start, I think by looking at



00:54:10:18 - 00:54:14:12  
there's a specific table in just bear with me.

00:54:22:08 - 00:54:33:10  
If if we turn to AP 041, Chapter 14 of the environmental statement and there is a table there. Um.

00:54:36:26 - 00:54:37:28  
Just bear with me.

00:54:45:04 - 00:54:47:18  
I just have to search through. I can't remember the table number.

00:54:48:01 - 00:54:48:16  
No problem.

00:54:48:18 - 00:54:51:06  
If you have a page number for me, that would be really helpful.

00:54:51:18 - 00:54:56:27  
Yeah, just bear with me. I can see the table in my head, but I can't remember the number.

00:54:58:00 - 00:54:58:19  
No problem.

00:55:16:26 - 00:55:18:24  
If I remember rightly, I think on one.

00:55:18:26 - 00:55:21:00  
Of the first pages there's a list of all the tables.

00:55:21:02 - 00:55:21:22  
If that might help.

00:55:21:24 - 00:55:23:17  
With the page references next to it.

00:55:25:07 - 00:55:33:10  
Yeah, I'm, I'm afraid I'm a visual person, so it's in my head rather than have to apologise for that. Um.

00:55:34:11 - 00:55:36:20  
Is it 14.24?

00:55:38:18 - 00:55:39:03  
Uh.

00:55:41:04 - 00:55:52:22  
It's the table that provides the breakdown of the emissions by live by the stage and the life cycle. So it's okay. It's let's try again. Let me slow down and have another go.

00:56:05:27 - 00:56:11:15  
Yeah, we think it might be 14.31 based on that description.

00:56:11:29 - 00:56:12:28

Thank you very much.

00:56:14:10 - 00:56:15:21

Page 62.

00:56:22:04 - 00:56:23:11

I'll attempt.

00:56:23:13 - 00:56:26:13

To share this on my screen just for people who.

00:56:26:15 - 00:56:28:05

Don't have that in front of them.

00:56:34:02 - 00:57:08:25

That is exactly the right table. Thank you very much for pointing that out. Okay, So so what? This. Sorry. Okay. So sharing. So what this table does is to look at each stage of the of the proposed development from construction operation and decommissioning. And it provides a side by side comparison of the expected emissions associated with the with the proposed development. So continuing with with landfill and with the proposed development for the for the disposal of the of residual waste.

00:57:08:27 - 00:57:18:17

So the construction phase, we've only looked at the proposed development. So the construction of the existing landfills has not included. But

00:57:20:21 - 00:57:36:12

that's that's a reasonable assumption as those landfills are generally spent mineral works. The operational phase includes the maintenance, repair replacement and operational energy, operational water, um,

00:57:38:00 - 00:58:17:06

other operational processes for landfill and for and, and indeed for transport and for the disposal of, of bottom ash and air pollution control residue. And so, so you can see that under the different elements of operation, there are several elements which have been included for the proposed development and not for the existing option of landfill decommissioning. Again, we've assumed there are carbon emissions associated with decommissioning of the plant, but nothing is been put against the decommissioning of of landfill sites.

00:58:17:29 - 00:58:48:28

And then the last line there in terms of avoided emissions, where you're looking at the, um, the displacement, if you like, of carbon emissions associated with electricity production. And from that we we calculate the total and then there is a difference. And that difference is the, is the net benefit of the proposed development compared to the base case of disposing of residual waste by landfill. In terms of the in terms of the confidence.

00:58:54:10 - 00:58:55:11

We have a.

00:58:59:15 - 00:59:25:26

We've carried out a robust assessment by first of all, by using published data and methodologies to provide a core case for assessment is considered a reasonable representation of the future. We verified

with reference to published reports and assessments. We've considered the sensitivity to the conclusion that waste to energy has less emissions than landfill, to variations in waste composition and electricity carbon intensity.

00:59:27:11 - 00:59:31:29

We've taken a conservative approach in adopting no assumed CHP,

00:59:33:21 - 00:59:42:19

a conservative approach in assuming no local electricity supply and a conservative approach in assuming no carbon capture.

00:59:45:19 - 01:00:14:26

So that gives us a, um, I would say a reasonable degree of confidence. Um, bearing in mind this is a projection into the future, so it would be unwise to be overly confident would suggest, but it gives us a reasonable level of confidence that the core assessment demonstrates that the project would have a net benefit in terms of carbon emissions compared to the landfill option. And that, of course, is in line with the waste hierarchy.

01:00:17:03 - 01:00:19:24

Okay. Think. Um.

01:00:21:17 - 01:00:52:16

Okay. If I can. Now, I would just like to read a couple of paragraphs from chapter 14. That's the document that we've just been sharing there. EP 041. Firstly, paragraph 14.9, point one, two states that exact details of the operational energy use of the destination landfills for the disposal of waste in the without proposed development scenario are unknown and based upon knowledge of annual energy consumption at closed landfill sites.

01:00:52:18 - 01:01:25:18

A reasonable estimate is that it's expected that the greenhouse gas emissions over the lifetime period of the proposed development for the landfill of 625,600 tonnes of residual waste per year would be approximately 25.04 kilotons of carbon dioxide equivalent. And secondly, paragraph 14.9 .50 states, the assessment above demonstrates that over these timescales, the proposed development can have a beneficial local effect in terms of achieving these carbon reduction targets.

01:01:25:20 - 01:02:04:29

But this will depend on where the landfill would otherwise be used for residual waste management in these regions. The greenhouse gas emissions for the without proposed development cases have been calculated, assuming waste is collected and transported to available landscape landfill sites. Again, think I'm seeking reassurance from the applicant with regards to the confidence they have in their comparative calculations. Given the number of assumptions that I think have been made in arriving at these conclusions, I appreciate it's not an exact science, um, but when the conclusion arrived at is, is that of a beneficial significant effect.

01:02:05:01 - 01:02:09:27

I do think it's important for the to understand how this has been arrived at.

01:02:11:00 - 01:02:27:00

Okay. So first of all, the the calculation of the landfill gas emissions is, is based on using UK government methodologies. So we have to be confident that those are the best that we have available as a calculation method. Um,

01:02:29:09 - 01:02:47:28

so that's not a that's not a numerical or statistical measure of confidence, but it's, it's a, it's, it's a measure of confidence in the method. Um, and then, and then returning to paragraph 14.9 .50, let me just remind myself of it.

01:03:09:09 - 01:03:13:00

Okay. So what was the specific question for this paragraph?

01:03:14:00 - 01:03:15:03

Um, I think.

01:03:15:05 - 01:03:49:00

It's just picking up on the terminology used, I suppose. Um, the in the paragraph, it does state that, um, it can have a, you know, the, the proposed development can have a beneficial local effect in achieving carbon reductions. But this will depend on where the landfill would otherwise be used for residual waste management in this region. So it's the terminology around that will depend. And again, the greenhouse gas emissions for the without proposed development case have been calculated, assuming waste is collected and transported to landfill sites.

01:03:49:02 - 01:03:55:16

So it's that assumption again, and I'm just it's just. Yeah. Okay. Confidence.

01:03:55:29 - 01:03:56:14

Um.

01:03:56:16 - 01:03:57:11

Excuse me.

01:03:58:18 - 01:04:09:29

At the risk of being seen to be ducking the issue, I think this is a this is a waste sourcing issue that I think was addressed yesterday. It may be better for someone else. Um, not to pick up on that.

01:04:10:17 - 01:04:15:27

Ma'am, forgive me for interrupting. Did you say 14.9 .50?

01:04:15:29 - 01:04:24:10

Yes. If you can just introduce yourself as well for the record, Mr. Fraser Urquhart, when you speak, please. It was 14.9 .50.

01:04:25:00 - 01:04:29:09

Because that doesn't seem to reflect the words that, that you've read out, the one I've got in front of.

01:04:29:11 - 01:04:30:09

Your apologies.

01:04:30:19 - 01:04:32:17

So that's why I query it.

01:04:52:06 - 01:05:11:06

I can see the wording on in the document that I have in front of me at 14.950. It's page 1465. Oh, sorry. 14.9 .51. Apologies for that. The paragraph numbering is very small. Thank you.

01:05:11:08 - 01:05:12:24

Yes. Now I'm with you.

01:05:13:19 - 01:05:14:16

Sorry about that.

01:05:27:18 - 01:05:31:24

Does the applicant have further comments that you would like to make in this regard?

01:05:33:26 - 01:05:48:03

Is Paul caring for the applicants? Thank you. I believe your question is about what local carbon reduction, greenhouse gas emission benefits might occur from this. If this project went ahead. Is that correct?

01:05:49:00 - 01:06:01:15

I think it's just really about the level of confidence that you have in in the comparison between the with the proposed development and without the proposed development figures.

01:06:02:18 - 01:06:28:20

Okay. Okay. Confidence is a difficult thing to to measure. If we were to go ahead, we would obviously look and we expect to be removing waste from landfill or the waste or whatever we would be treating, waste that would otherwise have gone to landfill. And in the local area, there are a number of landfills, notably a large one in the village of I. It's spelled spelt,

01:06:30:06 - 01:07:06:24

which is only a I think about ten miles from the facility towards Peterborough. And whilst I can't say it will be uncompetitive, it's highly unlikely to be competitive for the waste industry to deliver their ways to that landfill and that they would rather send it to us. I can't tell you off the top of my head how many years that landfill has got to go under its permit, but I would imagine that its inputs would be greatly reduced should we be permitted to go ahead and it's that sort of thing that would result in

01:07:08:14 - 01:07:12:22

greenhouse gas emissions reduction at that site.

01:07:14:13 - 01:07:16:18

Does that make sense? Is that. Answer your question?

01:07:18:00 - 01:07:28:00

For now, yes. Think there'll be further questions will be coming up with regards to the various calculations that have been made. Thank you. Um.

01:07:29:16 - 01:07:49:27

In terms of Chapter 14. That's EP 041. Um, Section 14.9 .49 concludes that the greenhouse gas impact of the proposed development will have a beneficial, significant effect. Can the applicant please explain how they've reached this conclusion?

01:07:50:15 - 01:07:56:11

So do you mind repeating the paragraph number 14.9 .49.

01:08:01:28 - 01:08:06:06

But in accordance with the guidance for for defining significance. Is that.

01:08:06:08 - 01:08:07:28

Yes. Yes, that's correct.

01:08:23:02 - 01:08:56:02

Okay. So we've made reference to section six of the guidance. Yeah. And which, which points out in the first bullet point of paragraph 6.1, when evaluating significance, all new GHG emissions contribute to a negative environmental impact. However, some projects will replace existing development or baseline activity that has a higher greenhouse gas profile. The significance of a project's emissions should therefore be based on its net impact over its lifetime, which may be positive, negative or negligible.

01:08:56:14 - 01:09:17:15

So clearly, in this example, we have a project which is C, which will replace existing development or baseline activity. So we are looking at the significance of the project in terms of its net impact over its lifetime. So that's in accordance with the guidance, first of all. I think that's hopefully not a

01:09:20:04 - 01:09:43:14

not for discussion. Paragraph 6.2 of the guidance goes on to say The crux of significance, therefore, is not whether a project emits greenhouse gas emissions, nor even the magnitude of greenhouse gas emissions alone. But whether it contributes to reducing greenhouse gas emissions relative to a comparable baseline consistent with the trajectory towards net zero by 2050.

01:09:45:00 - 01:09:45:16

Okay.

01:09:47:09 - 01:10:24:10

And so think think before I go on with that, I think it's it's worth just stating the tool in terms of towards net zero, then we as an economy are having to to reduce our emissions and not just stand still. So we need to be looking at technologies which are both able to reduce emissions today, but also capable of reducing emissions in the future. So if we take you know, so for example, earlier we talked about carbon capture, uh, the ability for carbon capture or the ability for combined heat and power.

01:10:24:21 - 01:11:01:26

Those are I know there's some discussion about, about whether those are, um, you know, what will make those happen in reality. Uh, that's not for discussion. I think the key thing is that it's an option on the table with waste to energy, whereas with landfill gas, um, that those options I would, I would say are not available. So, so waste to energy is as a, as a, as a means of waste disposal or disposal of residual waste is something that is aligned with and would be able to respond to the the ongoing and increasing requirements to achieve net zero.

01:11:02:07 - 01:11:05:10

Whereas landfill remains as it is today.

01:11:08:14 - 01:11:54:24

Um, so in the guidance that goes on to provide a table 14.19, it's providing table 14.19 of AP 041 um is essentially a reproduction of, of the, the the definitions of significance provided in box three of the guidance um, which provides definitions for for whether it's major adverse, moderate adverse and so on. And at the end of that table, at the end of that box, it includes the definition of beneficial, which is the, the project's net greenhouse gas impacts are below zero and it causes a reduction in atmospheric greenhouse gas concentration, whether directly or indirectly compared to the Without project baseline.

01:11:55:04 - 01:12:24:06

A project with beneficial effects substantially exceeds net zero requirements with the positive climate impact. So this project, the conclusion of the assessment, which again is in line with the waste

hierarchy, is that the waste to energy project will result in a net reduction in emissions compared to the baseline. And therefore, with respect to the the definition in in box three of the guidance that would be deemed beneficial.

01:12:25:13 - 01:13:06:14

I appreciate that. It says beneficial in Box three of the guidance, as you've said and as you've highlighted in in your table 14.19 um, in Chapter 14 of the year. Um, however, the paragraph 14.9 .49 concludes a beneficial significant effect. So it includes the word significant. And I'm just wondering where the where that word has come from, because the guidance doesn't, as far as I can say, reference significant beneficial, significant effect only beneficial.

01:13:09:01 - 01:13:33:19

Okay. So earlier in the EMA guidance, it makes reference to the fact that the receptor for considering carbon emissions is the world, it's the global climate and the global climate is under stress and therefore all emissions of greenhouse gases are deemed significant, whether positive, negative or so on. Okay.

01:13:36:01 - 01:13:37:00

Thank you for that.

01:13:37:09 - 01:13:59:29

I've also noted that in, um, within chapter 14, you've also recognized that the EMA guidance also states in Section 6.3 that only projects that actively reverse rather than only reduce the risk of severe climate change can be judged as having a beneficial effect. Um, could you comment on that statement as well, please?

01:14:00:19 - 01:14:31:27

Yeah. So, so on the face of it, that would appear to, to contradict, if you like, the sort of definitions of, of significance given in box three. Um, but my, my view on this is that if we were looking at, for example, the proposed development has a number of measures to, to increase its energy efficiency, uh, of the buildings for example. So that would reduce greenhouse gases.

01:14:32:12 - 01:15:11:07

To me that is not a benefit. Okay. It would be deemed, um, either negligible or minor adverse depending on the on the category, but it would not be deemed to be beneficial because it's not actively reducing or removing. It's not removing emissions. Okay. Um, and, but the project itself by display, by, by essentially disposing of residual waste in, uh, uh, um, rather than than landfilling residual waste that would have a positive effect in actively reducing emissions.

01:15:12:06 - 01:15:18:05

So to me, that's the, that's the, that's the, the way to interpret it. That's how I interpret it.

01:15:19:12 - 01:15:21:19

Okay. Thank you. Okay.

01:15:22:05 - 01:15:52:00

Final question before I move on to other parties. Um, can the applicant explain how confident they are that the proposed development is compatible with the net zero pathway? And think, please, can a note for the purpose of this hearing. I'm particularly interested specifically in the contribution of the proposed development itself to a net zero pathway, not necessarily the applicant's wider commitments as a company, which we do have within the written submissions that we've had from previous deadlines.

01:15:54:14 - 01:16:42:00

Okay. So so the to the the net zero pathway is, um, is as defined by the, the carbon budgets. So those, those carbon budgets set out five year budgets to be achieved across the UK as a whole. And there are as there are numerous policies and measures in place to to to to decarbonize the UK, if you like. And the net zero pathway is all about recognising that we cannot stand still and we have to we have to move forward and we have to recognise and this is this is quite important, we have to recognise that some of the technologies that we need to rely on are not yet fully available, but we know what they are and we need to be prepared for them.

01:16:43:00 - 01:16:45:12

And so.

01:16:47:00 - 01:16:52:16

As I as I as I said earlier, the the the opportunity of ways to energy to

01:16:54:02 - 01:17:39:19

either, you know, to either provide heat locally to provide electricity locally to to to have carbon capture. These are all options that enable it to to to remain on the the net zero pathway. The net zero pathway does require UK government leadership. Okay. And so so therefore this project cannot be considered to act in isolation in that respect. But importantly it provides it is prepared to remain on that net zero pathway, whereas what we will see over the next few years is, is a number of technologies or techniques that we're that we're using at present will fall by the wayside because they are they're not remaining on that pathway.

01:17:41:09 - 01:17:42:24

Clare Project for the applicant.

01:17:44:18 - 01:18:25:05

If I could just add to the points that have been raised there and just draw the examining authorities attention to paragraph 3.7.89 of the revised draft of Ian three, which sets out and cross, refers to section 5.3 of the revised draft of one. But that does clearly state that the proposed policy is that Secretary of State does not need to assess an individual application against either operational carbon emissions or their contribution to carbon budgets net zero or international climate commitments.

01:18:25:07 - 01:18:46:11

So whilst has obviously set out its corporate position, um, Mr. Ireland has explained some of the background and we just wanted to highlight that the, the policy position is that an individual application does not need to be assessed as against the net zero pathway.

01:18:46:18 - 01:18:52:27

Thank you. Okay. Thank you for that. If I can now ask Cambridgeshire County Council.

01:18:52:29 - 01:19:19:11

And Fenland District Council to comment on this issue with specific regard to the concerns identified in the Joint Local Impact Report. That's REP 1074, as well as those identified in their deadline two written representation. That's Rep 2033 and a relevant representation that rr 002.

01:19:20:25 - 01:19:24:17

Yes. Thank you, ma'am. I will introduce.

01:19:24:19 - 01:19:27:07

You can just state your name again, please. For the record.



01:19:27:25 - 01:19:36:04

Andrew Fraser, Kings Council for the Councils. Forgive me, ma'am. Was just working on the assumption that given we've got a live feed that anyone would looking would see me.

01:19:36:06 - 01:19:38:18

But it's just for the live stream. Thank you.

01:19:38:20 - 01:19:39:15

Yeah, that's fine.

01:19:40:18 - 01:19:55:19

Then I'm going to make a brief introduction, and then I'm going to turn to the County Council's climate change officer, Sarah Wilkinson, who sits beside me. Um, the starting point for this matter, notwithstanding what?

01:19:58:03 - 01:20:45:26

The applicants have just said about draft three, which of course is only a draft yet and has not been promulgated, still subject to an open consultation period. But notwithstanding that, the starting point for the Examination Authority's consideration is that the applicants are claiming a significant beneficial effect to be weighed into the planning balance. And we must be therefore very careful about examining that significant beneficial effect because proper, fair analysis suggests that it's based on some considerable assumptions which on examination may be quite dubious assumptions.

01:20:46:19 - 01:21:19:23

One initial remark to make is that they claim that they are taking a conservative approach by not assuming any CHP output or not assuming any carbon capture being in existence. Well, we don't think that can probably be described as a conservative approach. I'm not going to rehash the discussion we've just had, but you will see that both of those possibilities are at the moment highly speculative, we would respectfully suggest.

01:21:20:10 - 01:22:09:06

It's also in the context of this matter. Just look worth looking at Table 14.31 as you directed our attention to or if I think it was Mr. Olsen Ireland who took us there. But it's a useful starting point. And it's important to note that of the estimated emissions in the proposed development case, what a very large proportion of the emissions are made up of the operational energy category and it's that operational energy category which we say is subject to the greatest doubt on the base, the basis of the unproven assumptions.

01:22:09:08 - 01:22:44:13

And it's also worth noting what a large proportion of the benefit again is claimed from avoided emissions, where again, there are assumptions which Mrs. Wilkinson will take us through and a little bit of detail in a moment, but it's worth noting that in a sense, the most dubious parts of this calculation are the largest components of the eventual total, which we say is a significant factor. And adding to all the doubt that realistically should surround this claimed significant beneficial effect.

01:22:44:15 - 01:23:18:22

And it's also right to note that there's been a subsequent document prepared, a technical response, a technical note in response to comments we made at an earlier stage in the examination, which has accepted considerable revisions to the original figures set out in this table, which, as we noted in our written representations, considerably reduced Even the claimed benefit that's document AP Dash 088 for your note, ma'am.

01:23:19:07 - 01:23:39:20

Thank you. And so that's the background. And then just to introduce the the nature of our concerns in a little bit more detail before I pass over to Mrs. Wilkinson, you've already noted, ma'am, that the composition of the waste has a very significant impact on the

01:23:41:18 - 01:24:21:27

greenhouse gas emissions of the energy from waste product. And secondly, all of the applicants assumptions are based on a baseline that for the entire 40 year duration of the project, all of the waste, if it were not burned in this facility, would go into landfill. And that seems to be a pretty sweeping assumption. And then finally on the other side, looking at the avoided emissions that takes the as its starting point, the UK grid make up as it is now.

01:24:22:05 - 01:24:24:13

And at the moment it is assumed that.

01:24:26:16 - 01:24:29:27

Fossil fuel sources of electricity will.

01:24:29:29 - 01:24:40:21

Be reduced and the emissions, the avoided emissions are claimed on that basis as of now. But of course, we all know that the reality is that the.

01:24:40:29 - 01:24:41:28

Fossil fuel.

01:24:42:00 - 01:25:20:09

Elements of the electricity generating network are dropping away and are reducing over the 40 year lifetime of this scheme. So this scheme will increasingly, as it seeks to replace other forms of generation, it will be reduced, it will be replacing carbon neutral forms of generation. So once again and again, I'll let Mrs. Wilkinson explain this in detail. But again, that assumption, based on the composition of the grid as of now, is highly dubious and tends to overestimate the degree of benefit.

01:25:20:11 - 01:25:38:09

So that's an introduction as to why we say that the calculations are somewhat dubious. I know that you've picked up on a number of those in your opening remarks, but will now, if I may, introduce Mrs. Wilkinson so she can just put a bit of flesh on the bones I've outlined thanks to.

01:25:40:21 - 01:25:41:14

Okay.

01:25:42:29 - 01:25:46:01

So see that again? Can you hear me? Okay. Raise my mic.

01:25:46:03 - 01:25:47:09

Yes, I can hear you.

01:25:47:13 - 01:26:11:26

Great. Thank you. So it's Sarah Wilkinson and the carbon and energy manager for Cambridgeshire County Council. So, yes, there's a few concerns on this topic. Greenhouse gas emissions, excluding carbon capture and storage, which we've already discussed. And firstly, the overall scale of greenhouse gas emissions estimated by the applicant in table

01:26:13:12 - 01:26:54:21

14.27 and 14.31, about 11 million tonnes over the over the 40 year lifetime of the plant. And whilst embodied carbon from construction, will also be a large source of emissions that's considerably outweighed by the emissions from the operational phase, the vast majority of which are from burning of fossil carbon content of the waste material such as plastics. So this is a very large scale of greenhouse gas emissions. We're talking about. Um, secondly, as we've we've mentioned, greenhouse gas emissions from energy from waste plants such as this proposal do vary hugely dependent on the composition of the waste.

01:26:54:23 - 01:27:25:04

So in general, fossil carbon waste, such as plastics doesn't generate any greenhouse gas emissions in landfill, but does lead to a high emissions if that material is burned. Whereas if you've got biogenic carbon waste like paper or food and garden waste that generates high emissions if landfilled as it breaks down into methane. But fewer emissions have burned as the combustion process converts methane to carbon dioxide, although of course recycling or composting, that waste would be even better.

01:27:26:15 - 01:27:56:24

I'd like to draw your attention to the applicant's own sensitivity analysis in appendix 14 of their environmental statement, which is AP 088. They've considered two alternative cases for waste composition in that sensitivity analysis. However, both of these cases simultaneously reduce both food waste containing biogenic carbon and plastics waste containing fossil carbon by the same percentage.

01:27:56:26 - 01:28:29:00

So it's failed to consider the separate impacts of reducing either the biogenic carbon content or the fossil carbon content. And to test this, I've carried out a number of alternative scenarios in my own analysis. And unsurprisingly, what you find is that in some scenarios, energy from waste has lower emissions and in other scenarios landfill has lower emissions. So it's at best uncertain and it could be much higher or lower depending on the composition of the waste.

01:28:29:02 - 01:29:04:21

It's also worth noting on that front that should the composition of the waste differ, the quantity and tonnage of waste required to keep the proposed plant operational could also change because a lower calorific value of the waste would require a larger quantity in order to retain the same output of energy. Thirdly, I would challenge the description and the baseline of the without development scenario. As we've already touched upon. I think we cannot assume that without that development, all of the waste would continue to go to landfill for the entire 40 years of operation.

01:29:04:23 - 01:29:36:02

There are a number of alternative scenarios that could occur, could be a mixture of reducing the quantity of waste altogether recycling, composting, mechanical, biological treatment or different practices to capture landfill gas. And so the the baseline without development scenario is very uncertain. And I'd also add to that that this project cannot be regarded as replacing an existing development.

01:29:36:04 - 01:30:07:09

There is no particular existing development either on that site or elsewhere that this proposal is replacing. In any case, when you compare two scenarios that both have very high carbon emissions and state that one is lower and the other that's not the same thing as having below net zero carbon. Less bad does not equal good. And I'd come back to the guidance referred to earlier that only projects that actively reverse the risk of severe climate change can be regarded as beneficial.

01:30:07:16 - 01:30:42:11

So we've got to think carefully about what baseline we're actually comparing this to and just look at the emissions in its own right. And my fourth concern is specific to the figure that the applicant uses for avoided emissions from electricity generation, which is, I believe, entirely incorrect. The benefit from that particular category is much smaller than claimed in the applicant's environmental statement because they've used a single constant carbon intensity of electricity in their calculations, whereas in fact avoided emissions will gradually.

01:30:42:23 - 01:31:12:20

Each year, as we've mentioned, as the electricity grid decarbonise over time. And this has been taken into account in the applicant's own technical note. Now, I would draw your attention to document rep 1-036. Don't think that was on your list of documents, but that's an important one. And it's appendix 9.2 C. Within that document where the applicant has produced revised calculations of the

01:31:15:02 - 01:31:25:09

benefit from avoided emissions from electricity. Now that reduces the benefit by more than 2.8 million tonnes of carbon dioxide equivalent compared to the figure originally claimed.

01:31:26:29 - 01:32:01:14

That's only about 10% of the original benefit claimed. So the difference in emissions between the with and without development scenario is even if we accept what we're comparing it to is very small. And when you combine these four concerns together with it's greatly reduced benefit from avoided electricity combined with the very changeable emissions depending on the waste composition and the uncertainty of what would happen without the development. The overall uncertainty is such that we cannot know whether greenhouse gas emissions would be higher or lower from the development of without it.

01:32:01:26 - 01:32:09:05

We do know, however, is that we're never going to reach net zero emissions if we continue to burn fossil carbon. Thank you.

01:32:11:25 - 01:32:14:14

Would the applicant like to respond? Please? Please.

01:32:17:12 - 01:32:33:07

Gary McGovern for the applicant, perhaps before I pass over to Doctor Austin, Ireland. I'd just like to ask, we've just heard from Mrs. Wilkinson about conclusions from her own analysis, and I just wanted to check whether that analysis has actually been submitted into the examination.

01:32:35:27 - 01:32:36:25

Please respond.

01:32:37:10 - 01:32:46:24

Yes, there is a summary of that analysis in our response to one of the earlier documents only to find where that is.

01:32:47:04 - 01:32:48:24

Attached to the written summary of.

01:32:48:26 - 01:32:57:04

This. We can also attach it to the written summary of today's output. But there was a summary on previously in one of our response responses.

01:32:57:11 - 01:33:20:09

Ma'am, I think given that the challenges that have been laid at the applicant relates to assumptions and assessment and analysis that they've done, it's only fair that Ms. Wilkinson if she's seeking to rely on analysis, she's done presents the full analysis rather than the summary, so that we can also scrutinize that analysis in the same transparent way that she's been able to scrutinise the applicant's analysis.

01:33:22:23 - 01:33:35:02

As I said, man, we've no problem with that. Will attach the full analysis to our written representation. Sorry, our written record of today's proceedings and the applicants can scrutinize it to their heart's content.

01:33:37:06 - 01:33:47:07

Do we have a document reference within which I'm assuming you taken your information from a document that has already been submitted, Mrs. Wilkinson.

01:33:56:09 - 01:33:58:24

Thank you. You will either be in our

01:34:00:18 - 01:34:07:18

rep 2031 or comments on the applicant submissions. I'll need to have a look.

01:34:07:20 - 01:34:10:03

Sorry. Can we come back to you on that? In the interest of time.

01:34:10:27 - 01:34:12:12

Yes. That's not a problem.

01:34:13:00 - 01:34:16:15

It's absolutely fine if I can, um.

01:34:19:09 - 01:34:32:01

I don't know if the applicant wants to make any response at all, given the points before move to another interested party or would you prefer me to come back once we have the reference to those documents?

01:34:35:02 - 01:34:46:22

McGovern for the applicant, and I certainly would like to have the reference for those documents, and I suspect we would want to take the time to review those and respond in detail and in writing. I believe Mr. Kerry wants.

01:35:09:07 - 01:35:13:25

Ma'am, I'm afraid we're not able to hear what Mr. Kerry just said. Don't know whether they were muted.

01:35:15:15 - 01:35:17:08

I think the applicant may be muted.

01:35:17:12 - 01:35:18:02

Yes. Yes.

01:35:19:10 - 01:35:27:17

Apologies. Microphone issues. We were having a team team discussion. I was taking instructions. Apologies. Can everyone hear me now?

01:35:28:01 - 01:35:28:25

I can do, yes.

01:35:28:27 - 01:35:29:16

Thank you.

01:35:30:11 - 01:36:21:19

Thank you. Just to add just briefly to the points that we already made, ma'am, and the point that Ms. Wilkinson was making, it is, as a matter of fact, the purpose of the proposed development to take residual waste, which would otherwise be going to landfill. So it's entirely fair approach for the applicant to be taking in that regard. Secondly, just to add, from a policy perspective, it is very clear from the revised draft of N1 and N3 that energy from waste is in principle a form of development is supported in the future government energy strategy notwithstanding the net zero target, and it's also explicitly set out at paragraph 3.341 that energy recovery from residual waste has a lower GHG impact than landfill.

01:36:27:16 - 01:36:29:15

I think. Thank you for that. Think what I would.

01:36:29:17 - 01:37:07:26

Suggest at this stage, given, um. The information that Cambridgeshire County Council have put forward in the detail and the extent to which that information was quite comprehensive. And obviously, as the applicant doesn't feel that they've been given appropriate opportunity to to digest that prior to to coming along today. I think if Cambridgeshire County Council are happy with their when they do their written submission of today's representation to include the references to those documents and if we don't have them by the end of today's hearing.

01:37:08:03 - 01:37:31:09

Um, and then if I can get an action please, for the applicant to engage with the County Council on their key concerns and to provide a further response to ourselves at their earliest deadline, given the comprehensive nature of the the issue in front of them now. Would all parties be happy with that?

01:37:35:19 - 01:37:38:01

Yes, that's that's probably acceptable to.

01:37:38:03 - 01:37:38:29

The County council.

01:37:40:10 - 01:37:42:15

Likewise, that would be acceptable to the applicant.

01:37:44:04 - 01:37:44:21

Okay.

01:37:44:27 - 01:37:46:03

Thank you for that.

01:37:47:09 - 01:37:49:16

Okay. If I can move on, please.

01:37:49:18 - 01:38:20:09

Um, if we. If I can please ask the UK without Incineration network, if they have any representations they would like to make at this stage. Um, I would like to say that we do have your comprehensive written evidence which will be taken into account. What I would particularly like you to focus on today is what it is specifically about this proposed development that you wish to highlight in this hearing that you disagree with in terms of climate change and carbon emissions.

01:38:21:24 - 01:39:12:06

Thank you very much, ma'am. Thank you. Mr. Shlomo Dhawan, on behalf of UK Win. UK win has three matters that we wish to raise in order to help get to the bottom of a number of key issues pertaining to the assessment of greenhouse gas emissions for the Bedworth proposal. The first relates to spreadsheets and indeed to transparency, just as the applicant was citing moments ago. UK win has several times now requested the applicant provide us and the examination with an unlocked copy of their carbon calculations spreadsheets complete with formulae that would enable a user to carry out sensitivity analysis and to confirm that the various calculations are both mathematically correct and methodologically sound.

01:39:12:12 - 01:39:55:12

UK win is familiar from other planning enquiries with the provision of such spreadsheets as evidence. For example, as part of the inquiry that considered an application for an facility at Rye House in Hertfordshire. Whilst the applicant claims in their rep three hyphen 040 submission to have provided the requested spreadsheets, the document that they appended to rep 2023 and the spreadsheet emailed to us by the applicant are non-functional in that they are lacking the formulae used to derive the outputs from the inputs.

01:39:55:26 - 01:40:27:12

This can be analogous to a request for a recipe and then to be given a series of ingredients. We are looking for clarity here from the applicant. So my question, my first question for the applicant is does the applicant intend to share the oft requested spreadsheets or is it their position that they do not wish to be transparent in this respect? I don't know if you want me to hold off on my second and third questions to give them a chance to respond.

01:40:27:14 - 01:40:31:16

I think so, yes. If the applicant would like to respond at this stage.

01:40:32:13 - 01:40:38:24

Garner McGovern for the applicant, yes, we will provide the spreadsheets with the formulas included. Thank you.

01:40:41:27 - 01:40:49:11

Great. Thank you very much. Presumably this will be provided to all parties at deadline for. Is that.

01:40:51:11 - 01:40:54:02

Is that what the applicant has in mind?

01:40:54:28 - 01:40:59:14

Gary McGovern For the applicant, I was just checking, but yes, we should be able to provide that for deadline for.

01:41:03:08 - 01:41:06:00

Thank you. If I can have that as an action point, please.

01:41:11:18 - 01:41:13:13

Please continue, Mr. Darwin.

01:41:13:28 - 01:42:08:05

Thank you very much, ma'am. Darwin for a win. We were going to go into some depth regarding the topic of changes in composition as this is an issue that we cover comprehensively in our good practice Guidance set out in rep 1096 But Mrs. Wilkinson for the Council already raised some of our shared concerns, so we all benefit from that. All wish to add to what has already been said in that respect is that as set out by the applicant on table 14 C one of App 088, which is on the electronic page 42 of that document, the applicants carbon analysis has assessed the impact of biogenic carbon increasing from their core case by around 14 sorry, 17 percentage points.

01:42:08:07 - 01:42:28:07

So my question for the applicant is would the applicant be willing to assess the impact of the biogenic carbon fraction reducing from their core case by around 17 percentage points, which would bring it to around 40% in order to show the equivalent impact in the other direction?

01:42:34:25 - 01:42:37:27

But the applicant like to respond to this point directly, please.

01:42:39:27 - 01:42:44:28

Gary McGovern for the applicant. If we could have a moment just to confirm, ma'am, that would be very much appreciated.

01:42:45:09 - 01:42:46:01

Not a problem.

01:43:24:15 - 01:43:48:16

Thank God for the applicant. The applicant's position on this matter is that we have modeled what we consider to be the reasonable scenarios. So we were not proposing to submit any further modeling on the applicants part. However, if we are now providing the functional spreadsheets, then presumably when you would be able to do their own further scenario modeling if they wish to do so.

01:43:53:03 - 01:43:54:23

Please continue, Mr. Doohan.

01:43:55:15 - 01:44:40:02

Thank you very much, ma'am. Shlomo Doing, on behalf of the United Kingdom Without Incineration Network UK Win. UK Win has repeatedly raised our concerns about the applicant's handling of the issue of biogenic carbon sequestration in landfill, including in our 2066 submission and at paragraphs 61 to 66 of Rep 3050 where we explain how quote the applicants calculations, despite their claim, did not make a deduction in relation to the non-fossil carbon which is sequestered in the landfill unquote.

01:44:40:10 - 01:45:15:00

Such concerns are mirrored in Stephen Barclay's evidence, notably in Rep 206 for Appendix five, as summarised in Table two, which can be found on electronic page 122 of Rep 206. For the applicant's failure to properly account for biogenic carbon sequestration in landfill is decisive in the comparative analysis of the relative carbon performance of the Earth proposal relative to landfill.

01:45:15:14 - 01:45:53:03

When the applicant's calculations are adjusted to properly account for sequestration of biogenic carbon in landfill, then the impact of landfill is reduced by 171,846 tonnes of CO<sub>2</sub> per annum, which shows that the incinerator proposed for Bedworth would be significantly worse than landfill with respect to GHG performance. The method used for calculating the 1007 sorry, 171,846 tonnes per annum.



01:45:53:05 - 01:46:29:13

Figure is straightforward and it is set out in electronic. Page 121 of rep 264. The process involves multiplying the quantity of biogenic carbon that the applicant assumes would be sequestered in landfill, which is 46,867 tonnes of biogenic carbon is set out in table 14.24 of the applicant's Climate Assessment 41 and then multiplying this figure by 44 over 12 to show how much biogenic CO2 would be stored in landfill but released through incineration.

01:46:29:15 - 01:47:16:09

You'll be happy to know. I'm coming to my question now. Can the applicant confirm that they do not dispute that if one follows the methodology set out in Rep 2064 and kept all other assumptions as per the applicant's climate assessment at zero 41, this will result in reducing the benefit of the proposed Bedworth facility by 171,846 tonnes of CO2 per annum, which would be sufficient to tip the balance to adverse which the applicant considers to constitute an adverse significant effect because of course it will impact on the whole planet.

01:47:19:27 - 01:47:35:03

Thank you very much for your question. I think to be fair, given the numbers, the numbers and the facts and figures that you've just thrown at us, it might be easier to receive that question in writing and then we can respond accordingly, if that's okay.

01:47:38:24 - 01:48:02:03

Um, so this is Josh doing from Wayne here. Mean we we will read it in writing but in our understanding, this is a document that the applicant has already responded to and therefore they should already be assessed these claims and come to review on it or in the case that they actually looked at the document but hasn't actually assessed the claims that were made within the document that they commented upon.

01:48:03:05 - 01:48:03:20

Am

01:48:05:01 - 01:48:16:05

listening to the question. It's very difficult to to keep up with all the references and all the facts and the figures. So it would be easier to have that question in writing. If you don't mind. Then we can respond diligently.

01:48:16:24 - 01:48:17:28

Sorry, if you can just state your.

01:48:18:00 - 01:48:21:02

Name because we can't see that on the screen, please.

01:48:21:15 - 01:48:22:00

Um.

01:48:23:01 - 01:48:28:11

So apologies. It's Mateus and Ireland on behalf of the applicant. Thank you.

01:48:28:20 - 01:48:29:05

Yeah.

01:48:32:17 - 01:49:03:15

Oh, yeah. This is Josh Doane from India. Mean, I'd be happy for us to go into the numbers in writing, but suppose the main question is, is on the methodology that if you what you're doing is calculating the the savings of biogenic carbon sequestration from landfill that one way you can assess that is to look at how much biogenic CO<sub>2</sub> is assumed to be sequestered and effectively multiply that by 44 over 12, which is just the standard way that everyone converts carbon into carbon dioxide due to the different weights of the two things.

01:49:03:17 - 01:49:09:00

And that that is a way that you can use to assess your benefit if you wanted to do so.

01:49:11:02 - 01:49:16:15

Matters of the applicant really think it's going to be easier to to receive this question in writing, if you don't mind.

01:49:17:22 - 01:49:18:12

Okay.

01:49:18:18 - 01:49:38:19

I think as I've mentioned at the beginning of this hearing, this is a highly technical topic and subject. And I would prefer, if possible, if you could put that in writing, obviously you'd be doing a written summary of your case and submitting that to us. And then if I can have an action, please, for the applicant to please pick that.

01:49:38:21 - 01:49:39:06

Up.

01:49:39:08 - 01:49:49:14

And um, respond by the earliest possible deadline, please. Is there any other points that you would like to make, Mr. Dorn, today?

01:49:49:28 - 01:49:51:11

That's all for now. Thank you.

01:49:51:23 - 01:49:53:29

Thank you. Okay.

01:49:54:06 - 01:50:03:07

Um, before I come to any other interested parties, I can see that Mr. Fraser Urquhart has his hand raised. Would you like to come in, please?

01:50:04:14 - 01:50:42:14

Yes. Thank you, Mom. Just in similar vein, actually, in case there be any suggestion that the sensitivity analysis, the figures that Mrs. Wilkinson referred to were in some way a new point or a shock to the applicant. In fact, they were clearly set out in the local impact report itself, paragraph 9.4.9 on page 75. Uh, the reference for your note is this is rep 1-07 for the local impact report.

01:50:42:26 - 01:51:22:05

Um, the calculations clearly set out there and then over the page. Figure two, there is a graphical representation. So the matters were not only clearly set out in the LA, but in fact if one then examines the applicant's response to the local impact report, which is rep 2-020, if you go within that lengthy document to page 146 and this is for your note rather than to turn up now you'll see that the applicant has in fact provided a response to those figures.

01:51:22:07 - 01:51:41:13

So very far from being something which was a surprise to them or which they weren't able to deal with, they were in the local impact report and a response such as it is, has been provided by the applicants already. So just wanted to make clear that there wasn't any suggestion of having bounced the applicants today. Quite the reverse.

01:51:42:29 - 01:51:47:01

Thank you for that. Does the applicant wish to comment on that issue?

01:51:54:14 - 01:52:06:18

Gary McGovern for the Alcan. We're certainly grateful to Mr. Fraser for directing us to that material. We will certainly have a further look at that and consider whether there's anything we wish to add to our previous submissions. Thank you.

01:52:10:04 - 01:52:41:10

Matters and on behalf of the applicant. Just think the what we were asking for was the was the extra level of detail that that formed part of the calculation. And I'm thinking particularly in terms of the assumptions, for example, how was transport of waste, how was commissioning construction and so on included in the calculations. So it's not a it's not that we don't acknowledge we certainly don't suggest that the report was missing or the assessment was missing. It was wanting really just to compare like with like that was all.

01:52:41:24 - 01:52:42:11

Thank you.

01:52:44:08 - 01:52:44:27

Thank you.

01:52:47:11 - 01:52:49:23

What Cambridgeshire County Council wished to respond.

01:52:50:01 - 01:52:51:03

Before we.

01:52:51:15 - 01:52:52:15

Move on.

01:52:54:15 - 01:53:24:28

Only just to say that I'm not sure I really understand what Mr. Island has just said. What we are focused on and those calculations are solely focused on is the the sensitivity of the composition of waste. That single aspect, albeit it's the largest aspect or it goes to the largest component of the outputs of greenhouse gases in each scenario. So all these other matters about construction and whatever else it was, he said, totally irrelevant.

01:53:25:00 - 01:53:49:07

It's simply those calculations. They were there. They're set out. Obviously, if there's any further information that we have, will attach it to the written written summary of today. But the essence of the information was already all there for the applicants to see. And as I say, they've they've purported to respond. And in that response, when you examine it, you'll see that they have acknowledged, acknowledged the force and salience of the points that we make.

01:53:50:16 - 01:53:52:05

Okay. You can can I come back to the.

01:53:52:07 - 01:54:16:03

Applicant, please, Just particularly in regard to the composition of waste issue and and the confidence that they have in the figures that they've produced in relation to obviously, they have stated that the greenhouse gas emissions that calculations do depend on the composition of waste.

01:54:16:05 - 01:54:17:09

And obviously that can.

01:54:17:11 - 01:54:18:27

Change and be variable.

01:54:24:25 - 01:54:40:29

Uh, matters and Matterson Island on behalf of the applicant. So yes, of course, the the composition of the waste waste can vary. It varies day to day, week to week, whether it's been Christmas or Ramadan or so on changes for many reasons. I think it's important

01:54:42:21 - 01:54:49:18

to know that that that has to be a basic assumption of the assessment that there is variation in the waste. I don't think anyone argues with that.

01:54:51:19 - 01:54:58:12

Are we are we confident we've used the best available information to to undertake the assessment, as I described earlier?

01:55:03:16 - 01:55:04:03

Okay.

01:55:06:12 - 01:55:09:03

Mr. Fraser, your hand still raised. Is that because.

01:55:09:05 - 01:55:11:12

You'd like to make another point? No, it's because.

01:55:11:14 - 01:55:12:05

I'm an idiot.

01:55:14:24 - 01:55:16:06

Okay. Thank you.

01:55:17:28 - 01:55:18:17

Okay.

01:55:18:27 - 01:55:20:25

I can't see any more hands raised.

01:55:20:27 - 01:55:22:10

If I can ask if there's anyone.

01:55:22:12 - 01:55:24:21

Else who would like to make any comments.

01:55:24:23 - 01:55:27:20

In relation to item five of the agenda.

01:55:32:09 - 01:55:34:01

Don't see anything at this stage.

01:55:34:03 - 01:55:38:24

So thank you all for your contributions this afternoon. And I will.

01:55:38:26 - 01:55:40:05

Now hand back to.

01:55:40:07 - 01:55:43:15

Mr. Pinto, who will lead on the remaining agenda items.

01:55:52:11 - 01:55:57:16

Thank you, Mrs. Makinson. Can I just confirm that everyone can see me and hear me clearly?

01:55:58:17 - 01:55:59:25

I can see. Hear you.

01:56:00:05 - 01:56:29:12

Thank you. Um, so we will move on then to item six review of the issues and actions arising. So we have been making notes of the actions mentioned following from today's meetings, and I do not intend to go through them now, but we'll be writing those up and publishing them as soon as it's practicable. Um, are there any other comments that people would like to make on item six of the agenda?

01:56:33:19 - 01:56:58:24

I don't see any hands raised, so I'll move us on to item seven, which is any other business. Um, so DXY has a specific issue that would like to raise, but before I do. Are there any other outstanding jobs from people that they would like to raise? Before we close this meeting.

01:57:03:11 - 01:57:04:21

I don't see any hands raised.

01:57:05:03 - 01:57:36:16

Sorry. Tim Marks for the applicant. If I may just turn back to the outline. Local air quality monitoring strategy. We will. We've had a meeting during lunchtime and we'll be pleased to add in further, further commitments there. On the Exceedance point that Cambridgeshire County Council raised earlier in the day. Um, or possibly Dr. Little. And we will obviously update the document and submit that at deadline for.

01:57:37:03 - 01:57:46:27

Okay. Thank you very much for that confirmation. And I will note that as an action as well. Thank you. Um, any other business from anyone else?

01:57:51:23 - 01:58:36:07

I don't see any hands raised. So I will go then to the issue that I wanted to raise, which is the examining authority would like to acknowledge that it has not received notification of the applicant's intention to submit a request for changes. And this has now been published and I believe it's available on our website is a reference a as 015. Um, can I ask the applicant just very quickly for all of those

involved and present here, um, that you just highlight, um, the changes that you have proposed doing and the reasoning behind those changes, please.

01:58:41:18 - 01:59:17:09

Two marks for the applicant. I'll just provide a very quick high level outline of the proposed non-material changes that we've put forward. One of those changes is the result of detailed discussions with Cambridgeshire County Council as the Highways Authority. Um, we have been reviewing how the junction arrangements at Newbridge Lane and Cromwell Road Junction work with Signalization and consequently we would like to include some additional land which is in the highway boundary within the application to accommodate those filter lanes and signalization accordingly.

01:59:17:11 - 01:59:41:05

And then on there's a second change which is just along Newbridge Lane at the junction with Salters Lane where we have some drop kerb crossings that we just want to ensure are included within the order limits as well. So those are the two changes and they they've resulted from further discussions with Cambridgeshire County Council on the access improvements along Newbridge Lane and the Cromwell Road Junction.

01:59:42:05 - 01:59:55:23

Thank you very much. And can also ask the applicant to please confirm the date where the applicant expects those changes to be submitted to the examining authority for our consideration.

01:59:57:26 - 02:00:49:07

A clever project for the applicant is set out in the notification letter. The applicant is proposing to submit the changes application on the 5th of June, and we have set out in that letter a suggested timing and procedure for how a changes application that's submitted on that date can be accommodated within the existing examination timetable. That is based on the assumption that the changes application is accepted on the 9th of June by the examining authority, should they consider it appropriate to do so, and that that timescale is based on the acceptance of other changes, applications of a similar nature on other projects.

02:00:50:04 - 02:01:26:11

We've based that timescale on the assumption that because of the minor nature of the changes and the fact that we don't trigger the compulsory acquisition regulations because we're seeking solely an amendment to the order limits to enable highways works to be carried out and not the compulsory acquisition of additional land, and that the changes can be changed. This application does not necessitate any a separate form of non-statutory consultation in advance of the changes application being submitted.

02:01:26:13 - 02:02:09:23

However, we have set out in our letter should the examining authority consider that some form of non-statutory consultation should be carried out, then we've put forward a separate proposal for how that and timescales for how that non-statutory consultation process could be undertaken and how that could be accommodated within the timetable for the examination. In terms of submitting the application on the 5th of June, that that is obviously dependent on receiving confirmation from the examining authority as to whether it agrees with the applicant's position that there is no necessity for separate non-statutory consultation in advance.

02:02:10:01 - 02:02:47:07

Thank you. Thank you. Is just to clarify, we have received this notification yesterday afternoon. Therefore we will give it appropriate consideration and then obviously we'll come back on some of those points. Um, and can I just ask as well that the applicant has taken into consideration the planning inspector's advice? Note 16 in terms of request to change application and assume that the

applicant is actually familiar with this and that the change request, when submitted, will be developed in accordance to that guidance.

02:02:49:10 - 02:03:05:07

Clare Project. The applicant? Yes, the applicant is aware of the advice note and the submission of the notification letter is part of that process and the actual application itself will contain the information that is set out in that advice note.

02:03:06:04 - 02:03:09:27

Thank you very much for that. Mr. Andrew Fraser Could.

02:03:13:03 - 02:03:48:17

Thank you, sir. Just a couple of brief observations to make about this. You will appreciate that we as the County Council, only got an indication that this was the appellant, the applicant's proposed course of action very recently. Um, there are there are two observations to make. The first is that the change application appears to be based on an assumption on the applicant's part that all of the issues relating to the Cromwell Road, Newbridge Lane Junction have been resolved.

02:03:49:01 - 02:04:19:09

Um, we didn't get into this in the session today for obvious reasons, but the position is that whilst there has been progress, in fact not all the issues have been resolved. And the second assumption and the second observation is that again, the application appears to have been made on the basis of an assumption that all of the land, which is now sought to be contained within the order limits is highway land. Um, excuse me.

02:04:19:11 - 02:05:30:25

In fact, there are technicalities, at least on our first examination of the matter, that there are technicalities relating to the interaction between parts of that land, which is assumed by the applicant to be highway land and a section 106 agreement with Tesco's arising out of their development of the supermarket across the road, which means that that may not be a safe and certainly not a simple assumption. So whilst we don't make any comment on the issues raised in terms of consultation and so forth, at this stage, I do just want to put down a marker that the situation may not be as clear cut and simple as the applicants appear to believe in their, um, in their submissions to you and in their letter that said and I'm apologies are going on a bit but that said, I've instructed my team to engage with all possible speed in resolving some of these issues so that we can, if it is a simple matter that can be easily resolved, that we can go down that route.

02:05:31:05 - 02:05:36:25

But I just put up a flag that notwithstanding that there may be more to this than meets the eye.

02:05:37:22 - 02:05:41:14

Thank you. Can I ask the applicant to comment please?

02:05:43:02 - 02:06:14:18

Clare Project for the applicant. Um, the information that we've provided so that the, the areas of land that we have shown on the plans, um, accompanying the notification letter has been drawn up based on information provided to the applicant by Cambridgeshire County Council as part of these discussions. So it's obviously quite frustrating for the applicant if Cambridgeshire County Council are now saying that the information that they provided to the applicant to facilitate this change is not correct.

02:06:14:20 - 02:06:45:03

I would therefore be grateful if this point could be double checked as soon as possible because as the notification letter states, um, the changes application does need to be submitted fairly swiftly in order for it to be accommodated within the timescales left within the examination. But obviously the all the applicant can say is that the information that they're showing there is based on data and mapping provided by Cambridgeshire County Council as to the extent of the existing public highway. In respect of the first point made by Mr.

02:06:45:05 - 02:07:16:03

Fraser. Andrew Urquhart Um, where the purpose of the changes application is not is to increase the order limits to accommodate the signalization of the junction. Um, and based on the discussions we had, we're not suggesting necessarily that the full detail of the junction design has been agreed or signed off by Cambridgeshire County Council. At this stage. Further work is ongoing. We make that clear in the notification letter.

02:07:16:05 - 02:07:37:05

What we're seeking to do here is to increase the order limits so that it covers enough of the existing highway to carry out those proposals. We're not suggesting that the actual detailed design of the SIGNALIZATION has been approved or fixed in any way. That's still being discussed with Cambridgeshire County Council.

02:07:37:07 - 02:07:38:01

Thank you. Okay.

02:07:38:22 - 02:07:43:12

Can I ask Mr. Andrew Fraser if he would like to comment on this? Um.

02:07:45:01 - 02:08:21:18

So I don't want to get into a sort of slanging match about this. Obviously we were presented with this intention to put forward a changes letter at very short notice, even to our highway people, let alone to the wider team only 48 hours or less ago. Don't quote me on that, but that's my understanding. And so it's there's no there's no grounds for suggestions that the applicant is entitled to be frustrated by any of this.

02:08:21:20 - 02:08:30:05

This is in part a situation of their own making. But I don't want to get into a big debate about that. We are where we are and we'll simply have to deal with it.

02:08:31:10 - 02:08:38:06

Okay. Can I ask if the applicant would like to comment on this last point then before we move on?

02:08:41:23 - 02:08:58:29

And Claire project for the applicant. The applicant has had significant discussions with Cambridgeshire County Council, but don't think there's anything to be gained from us setting out the details of that here. But we'll continue to work with Cambridgeshire County Council to try and resolve resolve the points that have been raised just now. Thank you.

02:08:59:18 - 02:09:06:03

Thank you very much. Okay. Is there any other than anyone else would like to raise?

02:09:08:14 - 02:09:20:28

Mr. Andrew Fraser. Up. Thank you. I was just going to say, in terms of the hand being up, just wanted to double check that and anyone else that would like to raise any further points.



02:09:23:21 - 02:09:59:01

In that case all of a sudden to item eight, then closure of hearing. So thank you all for contributing to a very full and useful meeting. We will consider all submissions made carefully at the next hearing. In this examination is issue specific five, which is due to begin at 10 a.m. tomorrow, and this hearing will be held will be held as fully virtual as this one at the time is now 1640, 20 to 5 and aside for from met with energy from waste limited is now closed.

02:09:59:03 - 02:09:59:23

Thank you.