

Medworth Energy from Waste Combined Heat and Power Facility

Response to Examining Authority's Second Written Questions by Wisbech Town Council

PP.2.1.

Under Revised Draft NPS EN-1: 3.3.39 – 3.3.40 of the National Policy Statement Tracker [REP3-031], it states that “The proposed plant must not compete with greater waste prevention, re-use, or recycling, or result in over-capacity of EfW treatment at a national or local level”. In light of this and considering the overall objectives of the Waste Hierarchy, can the Applicant please provide an update on how the Proposed Development will not compete with targets for waste prevention? IPs and LHAs are also invited to comment on this issue.

As stated in previous submissions, it is Wisbech Town Council's contention that the proposed plant will compete with greater waste prevention, re-use and recycling and will result in over-capacity of EfW treatment at a national and local level.

Setting aside the serious concerns with the definition of the waste catchment area outlined in previous submissions, the suggestion that there will be 2.4m tonnes of waste going to landfill (paragraph 6.2.1 of the Waste Fuel Availability Assessment - REP2-010) over the 40 year operational life of the proposed plant is highly misleading and does not take into account the Government's commitment to reduce residual waste by 21% in the short term (i.e. by 31st January 2028) and by 50% by 2042 set out in the Environmental Improvement Plan. Neither does it take into account consented capacity at Rookery South, Rivenhall or Newhurst, which collectively amount to 1.53m tpa.

The Applicants are due to update the WFAA at Deadline 5. It is essential that the overall conclusions included at Section 6, appropriately consider the implications of the EIP targets as well as currently consented capacity within the study area on the future availability of residual waste.

As the amount of residual waste reduces, it will inevitably generate spare capacity in currently operational facilities, further reducing the need for the Medworth EfW CHP facility. The Applicant will therefore need to compete for waste from areas significantly beyond the waste catchment (contrary to the proximity principle) by reducing the gate fee to a level which undermines the achievement of targets for waste prevention.

In order to obtain finance to construct and operate the plant, it is likely that the Applicant will need to rely on long term waste contracts which are often not flexible enough to deal with changes in waste arisings and composition which therefore also may compromise targets for waste prevention.