My name is Alan Wheeldon, I am a scientist and resident of [redacted] of 8 years. I am also a member of the anti-incinerator group WisWin.

Emissions from energy from waste facilities are increasing and threaten to compromise the UK's target to decarbonise the power sector by 2035. This has prompted the National Infrastructure Commission, a body that advises government on the UK's long term Infrastructure needs, in their report published on the 27th March this year, to state that all emissions from energy from waste plants, need to be eliminated. If this is not done, current net zero carbon targets are unattainable.

Energy from Waste incinerators like the one proposed by MVV to be built in Wisbech emit thousands of tonnes of emissions throughout their lifetime. MVV state in their planning application (1) that the proposed Medworth incinerator will emit 10,993.2 ktCO2e, over the incinerators 40 year lifespan, from 2026 to 2066.

In spite of what they claim, MVV cannot completely offset their greenhouse gas emissions with the CO2 and methane from landfill as these are reducing considerably following the implementation of the Environment Act 2021 (2) to remove food from municipal waste and to boost recycling levels. In addition, MVV cannot offset the CO2 released from their incinerator with the CO2 released from burning fossil fuels as these are also falling following measures to decarbonise the energy providing industry (3). Subsequently, with the proposed reduction in Landfill and the rapid decarbonisation of the power generating industry, Greenhouse gas emissions, such as CO2, from Energy from Waste incinerators, will make a proportionately higher contribution to increasing global greenhouse gas levels, which will have a significant detrimental effect on the climate and a negative impact on the UK Governments objective to decarbonise the power generating industry by 2035 and to meet its net zero carbon budget targets by 2050.

This fact was noted in a report by the National Infrastructure Commission published on 27th March this year (4), which stated, 'to meet the government's aim of decarbonizing the power sector by 2035, emissions from energy from waste plants will now need to be eliminated.' Note, that in their recommendations, the National Infrastructure committee have chosen to use a very strong directive, stating that it will

not be adequate to simply reduce emissions from Energy from Waste plants, but that they have to be eliminated.

With that in mind, MVV have provided no viable binding commitment to incorporate carbon capture technologies in its planning application, to eliminate emissions from burning 625,000 tonnes of waste per year and with no current legislation in place to enforce such measures, MVV can and will release almost 11 million tonnes of CO2e over the 40 year lifespan of their proposed incinerator.
This lack of 'Green' credentials for the Energy from Waste industry is reiterated in the report from the National Infrastructure committee. It shows that since 2014, emissions from Energy from Waste facilities have increased and currently continues to rise, as more incinerator plants are built.

This has prompted the Climate Change Committee in their report to Parliament, on progress to reduce emissions published recently on 28th June 2023 (5), to declare. 'Energy from Waste (EfW) emissions are already higher than the Government's Carbon Budget Delivery Plan anticipates and EfW capacity is set to increase in the coming years. We recommend a moratorium on additional EfW capacity until a review of capacity requirements has been completed and an updated assessment of residual waste treatment capacity requirements published.'

Calling for a moratorium on the building of any new incinerators does not compromise the UK's plans for energy security as the Governments latest report released on 30th March this year (6), on providing energy security for the UK, by using Net Zero green energy technologies, Energy from Waste does not feature at all. Primarily because it is neither efficient nor green.

In Conclusion.
To fulfil the commitments, to eliminate all emissions from Energy from Waste facilities, outlined in the National Infrastructure committees report, and to support the Climate Change committees call for a moratorium on all new incinerators, it seems the logical path for the planning inspectorate, not to recommend that the Medworth Energy from Waste incinerator, proposed for Wisbech, be granted a development consent order, as the National

Infrastructure commissions report, shows that it is not in the National interest to do so.

References

1) Medworth Energy from Waste Combined Heat and Power Facility PINS ref. EN010110 Document Reference: Vol 6.2 Revision 1.0 June 2022 Environmental Statement Chapter 14: Climate
2) Legislation.Gov.UK Environment Act 2021 57 45A
3) Department for Business, Energy and Industrial Strategy, UK Energy Brief 2022 page 28
4) Infrastructure Progress Review March 2023 National Infrastructure Commission
5) Progress in reducing UK emissions 2023 Report to Parliament Climate Change Committee June 2023
6) Powering Up Britain UK HM Government publication March 2023

Title:

The approval of the Boston energy from waste incinerator just 28 miles away has negated a need for the MVV waste incinerator in Wisbech, due to incinerator overcapacity in this region.

My name is Alan Wheeldon (a registered interested party, ref 20032437). I am a Scientist and a Wisbech resident of 8 years. I am also a member of WisWin, a local anti-incinerator group.

The Boston Energy from Waste incinerator:

Just 28 miles away, up the A17, plans have been submitted to build a One million tonne capacity, energy from waste facility at the port of Boston (1). The formal planning application was submitted on 20th April 2021. A validation report submitted by the Planning inspectorate on 10th March 2023 supports a Development Consent order being granted for this project subject to certain criteria being met. (6) The Secretary of State approved the Development Consent Order on 6th July this year, 2023.

The port site was chosen as it allows the building materials for the Boston incinerators construction to be brought by sea and once operational the waste will also be brought in by sea from 12 other UK ports. By using ships, the Boston facility avoids the need for a large number of lorries on the roads, which dramatically reduces emissions from traffic and prevents congestion on the local roads surrounding the site and in Boston itself. The ash produced from burning the waste would also be transported away by ships.

The facility will include two carbon dioxide recovery plants which will capture some of the CO2 and this will be used for a range of other industries. The Boston waste handling facility will create 300 new jobs. There are very few objections to an incinerator being built at Boston with no objections from the local MP or councillors.

Approval of the Boston facility with a 1 million tonne capacity has completely negated the need for a smaller facility just 28 miles away here in Wisbech.

The lack of need for another Incinerator in this area becomes even more apparent due to the recent introduction of the Environment Act 2021 (2). With the application of this act, it is anticipated that landfill and burnable waste will be considerably reduced going forward, as all food waste will be collected separately which will immediately reduce burnable waste by 30%

(7). Increased use of recyclable materials encouraged by the act will reduce burnable waste even further and boost recycling levels. This view is reinforced by new targets recently announced by the UK Government, to halve the amount of waste going to landfill or incineration in England by 2042 (3).

The reduction in waste available to burn means that there will be a projected incineration overcapacity of 14.7 million tonnes in England, with overcapacity occurring as early as 2030. (4).

With a projected incinerator overcapacity in mind, I would like to highlight that in the Government's September 2021 Draft National Policy Statement for Renewable Energy (EN-3) it states that any proposed incinerator, quote "must not result in over-capacity of EfW waste treatment at a national or local level."

Subsequent to this information, should the Planning Inspectorate question, that in the light of the large reduction in burnable waste going forward and with the superior Boston incinerator now being built, that it will not be possible to guarantee to provide enough waste to burn, to be able to achieve the 50Mw of electricity that MVV are committed to generate, that makes the MVV incinerator a Nationally Significant Infrastructure Project. Further due diligence is required by MVV for this project, as the evidence suggests that there is no requirement for the MVV incinerator to be built at all and another incinerator in this region is not in the National interest.

References

1) National Infrastructure Planning website. Boston Alternative Energy Facility (BAEF).

2) Legislation.gov.uk Environment act 2021Part 3.

3) The Environmental Targets (Residual Waste) (England) Regulations 2023', the regulations as a Statutory Instrument came into force on 30 January 2023.

4) UKwin.org.uk Incineration Overcapacity Briefing

5) 'Draft National Policy Statement for Renewable Energy Infrastructure (EN-3)' (September 2021) Dept of Business energy and industrial strategy.

(6) Boston Alternative Energy Facility Validation report ref. EN010095 March 2023.

7) WRAP National Municipal Waste Composition, England 2017 3.1 Table 2