

Medworth Energy from Waste Combined Heat and Power Facility

Issue Specific Hearing 7 – 27th June 2023

Submission made on behalf of Wisbech Town Council

Waste Issues

1. It is Wisbech Town Council's contention that the development proposal is not in accordance with the waste hierarchy or the proximity principle and is not of an appropriate type and scale.

Waste catchment area

2. The waste catchment area has been manipulated by the Applicant in an attempt to justify the facility. As a consequence of this, residual waste will need to be imported significant distances to the proposed facility.
3. The Applicant's methodology for defining the waste catchment area has been inconsistently applied. Milton Keynes has now been removed from the study area as it is not within the two hour drive time and neither is it within the former East of England planning region but West Northamptonshire remains within the study area when it is also outside the two hour drive time and is also not within the former East of England planning region.
4. The justification for including data from authorities outside the two hour catchment area on the basis that data is only available on a regional basis does not bear scrutiny. The Applicant has included some authorities from the former East Midlands planning region, suggesting it is entirely possible to disaggregate the data to district level.
5. If the approach is to remove authorities that are not within the two hour catchment at all, then Luton, Leicester City and West Northamptonshire should be removed alongside Milton Keynes. The removal of Milton Keynes only is a cynical attempt by the Applicant to inflate the residual need given that Milton Keynes currently has a surplus of waste management capacity of 193,000 tpa.

Implications of Environmental Improvement Plan

6. The Applicant has similarly manipulated the data for national need when considering the implications of the Environmental Improvement Plan and have not considered the implications of the requirements of the EIP at the local level.
7. It is entirely possible to calculate the target waste per head using ONS population projections for local authorities rather than simply for England. As the draft NPS EN3 makes it clear that the proposed plant must not compete with greater waste preventions, re-use, or recycling, or result in over-capacity of EfW waste treatment at a national or local level, it is incumbent on the Applicant to consider the implications for the EIP targets for the reduction in residual waste at the local level.

Proximity Principle

8. The Applicants have included a requirement in the draft DCO relating to the origin of waste. This only seeks to ensure that 17.5% of the total 625,600 tpa of the waste processed at the site will come from within 75km of the site i.e. only 125,120 tpa. The remaining 82.5% or 516,120 tpa could originate from anywhere beyond 75km. Not only is Waste Area 2 not defined at this stage, but requirement 29(2) also allows for waste transported into Waste Area 2 to a waste loading point, to have originated in Waste Area 2.
9. Requirement 29 does nothing to ensure that waste is managed in accordance with the proximity principle, i.e. to manage waste at facilities located as close as reasonably possible to where waste is generated, to reduce the need to travel and to encourage communities to take responsibility for the waste they produce. The suggestion by the Applicant in paragraph 2.3.5 of the WFAA (June 2023) that Requirement 29 guarantees compliance with the proximity principle is ludicrous.
10. The Applicant stated at ISH7 that waste was unlikely to be transported beyond the two hour catchment for commercial reasons i.e. it would be too expensive to transport waste significant distances, and for this reason, the fact that Requirement 29 would allow for waste to be imported from locations beyond the two hour catchment, the reality is that this would not occur in practice. If that is the case (which seems likely), the Applicant cannot then rely on waste beyond the two hour drive time as being genuinely available to the facility. They cannot have it both ways. As set out in detail in previous submissions, if the Applicant is restricted to receiving waste from within the two hour drive time, there will be insufficient waste to justify a facility of this size.