

Medworth Energy from Waste Combined Heat and Power Facility

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

GCT.3.3

The Applicant has highlighted a series of "matters not agreed" (marked in red in Table 4.1: Summary of Commonality with each party) in the Statement of Commonality [REP6-009]. These seem to highlight areas where there is no reasonable prospect of issues being resolved or agreed before the end of the Examination, or where discussions have stopped. The ExA asks all organisations that are no longer in active discussions with the Applicant but have outstanding issues not agreed, to submit a brief overview of their outstanding objections to the ExA highlighting main points of contention.

Need

- 1.1 Wisbech Town Council maintains its position that the proposed Medworth EfW CHP facility will compete with greater waste prevention, re-use or recycling and will result in over-capacity of EfW waste treatment contrary to draft NPS EN-3 and as such the presumption in favour of energy infrastructure set out in draft NPS EN-1 and relied upon by the Applicant will not apply.
- 1.2 Draft requirement 29 does nothing to ensure that waste is managed in accordance with the proximity principle. As drafted, it would allow 82.5% or 516,120 tpa to originate from locations beyond 75km.
- 1.3 The Applicant is reliant on the study area defined in the WFAA to demonstrate that it will not result in over-capacity of EfW treatment at a local level to justify the need for the facility, but then only committing to a very small proportion of the total waste processed at the facility to have originated from within this area.
- 1.4 The study area has been manipulated by the Applicant in an attempt to demonstrate that there is sufficient residual waste available. Had the study area been limited to the two hour catchment, it is quite clear that there would be insufficient waste to justify an EfW of the scale being proposed.
- 1.5 The amount of waste genuinely available within the two hour drive time is only a fraction of that claimed by the Applicant once the capacity at Rookery South and other consented and shortly to be operational facilities at Rivenhall and Newhurst and the targets set out in the EIP are taken into account. This will be reduced further when the recently consented Boston Alternative Energy Facility is taken into account.
- 1.6 Wisbech Town Council maintains its position that the Applicant is relying on waste from areas significantly beyond the two-hour drive time catchment. This is unsustainable and contrary to the proximity principle.
- 1.7 Even if the need for a facility of the scale proposed could be justified, geographically, Wisbech is not well located to serve the needs of the wider region. It is some distance from the larger centres of population and would require waste to be transported significant distances to be processed.

- 1.8 The Applicant's assessment of future residual waste requirements is also grossly exaggerated. The suggestion that any waste exported by a waste planning authority amounts to an unmet need capable of being accommodated at the proposed Medworth EfW CHP facility is nonsensical. The proposed facility relies almost entirely on waste being imported significant distances from waste planning authorities outside Cambridgeshire.
- 1.9 Notwithstanding the above and the fact that the Applicant again is reliant on shortfalls in capacity from outside the study area to justify the facility, the evidence base supporting Waste Local Plans to forecast future requirements does not take into account Government targets set out in the EIP to reduce the amount of residual waste by 50% by 2042.

Alternatives

- 1.10 The Applicant stated that it did not consider alternative sites, which appears contrary to the position advanced at ISH1 when it was suggested that sites in Norwich, Wisbech Essex and Peterborough were looked at. Where alternative sites have been considered they need to be documented in the Environmental Statement.
- 1.11 The Applicant stated that the site was chosen by looking at sites with a capacity gap, a user for heat, proximity to the strategic road network and free from environmental constraints.
- 1.12 As the facility is stated to meet a regional need, the purported capacity gap is not specific to the application site – it could be met anywhere within the region. The only justification for the site is the potential for heat use (although no evidence has been put forward to substantiate this) and its proximity to the strategic road network. It does not make for good planning to locate a regional waste facility in Flood Zone 3 on the northern edge of the waste catchment, some distance from a major urban area.
- 1.13 The failure to consider alternative sites is a serious omission given that the application site is within Flood Zone 3. The Sequential Test required by both the NPS EN-1 (paragraph 5.7.9) and the National Planning Policy Framework (NPPF) requires consideration of alternative sites at lower risk of flooding (i.e. Flood Zones 1 or 2) as part of site selection.